



MODERN SLAVERY STATEMENT

INTRODUCTION FROM CHAIR AND CEO

Nominet is opposed to all forms of slavery and human trafficking and has controls in place to ensure these do not exist within our organisation or supply chain. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We have policies and procedures in place to ensure our supply chain is well managed, robust, resilient and delivering goods and services ethically. To date we have had no reports of modern slavery, human trafficking or child labour within our organisation nor our supply chain.

This statement provides some background to our organisation and our supply chain. It also sets out the policies we had in place during the financial year ended 31st March 2025 to prevent corruption, slavery, human trafficking and child labour from taking place in our organisation.

Two handwritten signatures in grey ink. The first signature is "A. J. Green" and the second is "Paul Han".

OUR ORGANISATION

Nominet UK is a company limited by guarantee registered in England and Wales. It is the parent company of a group of subsidiaries and during FY25 the group consisted of five companies that support our range of activities.

Activities are overseen by our Board of Directors who have ultimate responsibility for all that Nominet does. Day-to-day management responsibilities sit with the Executive Leadership Team which reports directly to the Board of Directors. Alongside the activity described in this statement, we comply with all national laws for the territories we operate in.

Our supply chain

We use suppliers to support the operations of our organisation. The key areas in which we engage suppliers are:

- Communications service providers
- Consulting
- Facilities
- Finance and investment management



- Legal
- Managed telecommunications service providers
- Marketing and public relations
- Operations
- Professional services and contingent workforce
- Software support vendors
- Telecommunications infrastructure and hardware suppliers

OUR POLICIES AND PROCEDURES

We have a suite of policies and procedures which reflect our commitment to acting properly in all our business relationships and to implementing and enforcing effective systems and controls. They apply to all our employees and to anyone engaged on a temporary basis.

- Whistleblowing policy – sets out how employees can raise concerns over issues which are in the public interest such as criminal activity, improper conduct or unethical behaviour.
- Anti-Bribery policy – sets out our requirements for conducting all business in an honest and ethical manner by adopting a zero-tolerance approach to bribery and corruption.
- Procurement policy – requires us to purchase goods and services from suppliers that act with integrity, behave responsibly with regards to the environment and society and comply with anti-slavery legislation, whilst meeting our business needs.
- Health and Safety policy – a key aim of which is to ensure the safety of all our employees and anyone else who may be affected by our activities.
- HR procedures – we check that all our staff have appropriate right to work documents and ensure they are paid fairly and receive a competitive remuneration package.
- Equality, Diversity and Inclusion policy – outlines our commitment to provide equality, equity, fairness and respect for everyone in our employment.
- Sustainability policy and reporting – sets out our commitments, responsibilities, and arrangements for minimising Nominet's impact on the environment.
- Risk Management, Business Continuity and operational policies – promote operational resilience and keep our activities compliant with applicable laws, regulations, and codes of governance (including in relation to slavery and human trafficking).

We will continue to review and develop our policies to ensure that they are effective and appropriate.

DUE DILIGENCE

In line with the requirements of the Modern Slavery Act we have identified the areas within our business and supply chain that have the highest risk profile with regards to modern slavery and human trafficking. These are:

- Procurement – modern slavery can occur in a supply chain through inadequate or inappropriate procurement practices. We purchase our electronic equipment through reputable global brands with established sourcing controls in place however we recognise that risk remains that purchased electronic equipment may originate from countries with lower employment standards than in the UK. The highest risk area that we procure services in are associated with our office maintenance and physical security activity.
- Service delivery partners – modern slavery can occur in a service delivery supply chain through inadequate controls or lack of oversight. The highest risk areas are our overseas operations in higher risk countries.

We have identified the main risks in respect of these key areas and put measures in place to mitigate them. These include:

- Maintaining an effective Procurement Policy and procedure
- Screening potential suppliers and partners using pre-qualification and onboarding questionnaires, and where appropriate, credit rating and “financial distress” checks
- Supplier and partner performance and due diligence evaluations
- Ensuring we have the correct checks and balances in our recruitment process

Our due diligence activity into suppliers has raised no concerns relating to the prevention of slavery, trafficking and child labour in our business or supply chain.

RISK ASSESSMENT AND MANAGEMENT

Nominet has an established enterprise risk management methodology in place and a rolling programme of activity that seeks to identify and manage the risks of corruption and modern slavery.

During the reporting period we continued to use the Social Responsibility Alliance's Slavery & Trafficking Risk Template (STRT), adopting the refreshed template that has been published. The STRT is a standardised open-source template that can be used to capture slavery and human trafficking-related risk and compliance data. We use our slavery and human-trafficking risk assessment process to help us identify areas within our operations and supply chain that may be at risk of human trafficking or slavery.

KEY PERFORMANCE INDICATORS

Nominet's KPIs have been developed to enable the business to measure its overall performance as a business. Care is taken to ensure that the KPIs set do not encourage malpractice of any type.

We monitor the effectiveness of our activities to ensure the prevention of slavery, trafficking and child labour in our business and supply chain. Our current methods include:

- Due diligence on suppliers that gathers information relating to policies and procedures to ensure responsible business practice; completion rates are tracked and responses logged

- Employee training records that capture details on completion rates for training and awareness activities; completion rates are tracked and action taken where training has not been completed
- Quarterly Audit & Risk Committee meetings; updates on risk assessments and compliance activities are shared and further actions agreed where needed

TRAINING AND AWARENESS

Information and training is provided to all our employees, contractors, and visitors on relevant matters. Examples of the information and training provided are:

- All new joiners follow an induction programme which includes information and guidance on where to find our policies.
- All new joiners are required to undertake specific Business Continuity, GDPR, Health and Safety, and Information Security training.
- Subject Matter Experts (SMEs) and managers can refresh and maintain their knowledge via the self-service learning and development resources we provide to our employees.

OUR ACHIEVEMENTS

In our previous Modern Slavery Statement for FY24 we committed to:

- Deploy a new Supplier Environmental, Social and Corporate Governance (ESG) Policy.
- Deliver new training modules relating to identifying unethical practices and refresher training on Nominet's policies relating to preventing bribery, corruption and malpractice in procurement.
- Deliver additional internal audits with a broader and deeper scope.
- Review our supplier due diligence platform/tools and the alternatives available with a recommendation to the business on the solution that will best support our environmental and social issues due diligence.
- Refresh training and guidance on procurement practices for employees and managers with direct responsibility for supply chain management.
- Continue KPI reporting.

We are pleased to share the progress we have made on these commitments. During FY25 we:

- Strengthened the supplier due diligence processes run by the Procurement Review Board.
- Published an updated Procurement Policy that includes our Environmental, Social and Corporate Governance (ESG) requirements for suppliers.
 - Used the Nominet ESG measures, alongside the traditional financial competitiveness measures, when procuring services including a replacement vending service for the Nominet HQ. We now use a certified B Corporation supplier, reducing the risk of Nominet procuring tea, coffee and chocolate from unethical sources.
- Provided updates to the business on:
 - Why it is essential for Nominet to conduct all business in an honest and ethical manner, highlighting the company's Anti-Bribery Policy.

- Nominet's refreshed Procurement Policy and strategy for simplifying our supply chain.
- Leveraged our Gartner relationship to explore best practice solutions and suppliers and made the decision to renew our existing platform.
- Reported on KPIs relating to effective governance and control and continued to assess the effectiveness of our activities to combat slavery and human trafficking.

The Nominet internal audit team delivered an anti-bribery and corruption audit with an expanded scope covering Nominet's ethical practices and controls and the execution of donations through Members and Staff GiveHub.

OUR COMMITMENT TO COMBATING SLAVERY AND HUMAN TRAFFICKING

During the current financial year ending 31st March 2026, we will continue to deliver our programme of due diligence activity and make further improvements including:

- Awareness raising activities to increase awareness of modern slavery risks and indicators:
 - Nominet employees - Extending training and awareness activities to staff directly involved in procurement and contract negotiation.
 - Supply chain - Delivering a pilot via best practice modern slavery awareness training for a pilot group of our direct supply chain.
- Identifying and investigating and potential new risk areas as they arise.

We will continue engagement across our business to share and learn insights about mitigating Modern Slavery risks including:

- Refreshed training and guidance on procurement practices for employees and managers with direct responsibility for supply chain management
- Continued KPI reporting

OTHER ACTIVITIES

We remain proud of our longstanding relationship with the Internet Watch Foundation (IWF) and during FY25 we worked closely with them to tackle the presence of child sexual abuse content hosted on .UK domain names. We also continue to partner with law enforcement agencies to suspend domains used for criminal activity. This work together with anti-phishing initiatives such as Domain Watch help to tackle pernicious activity and remove funding sources supporting organised crime. Collectively these responses demonstrate our commitment to tackling online criminal activity, including human trafficking, that may be operating in the .UK namespace.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Nominet's modern slavery and human trafficking statement for the financial year 1st April 2024 to 31st March 2025.