

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 31 March 2026 to prevent corruption, slavery, human trafficking and child labour from taking place in our organisation.

Two handwritten signatures in grey ink. The first signature appears to be "A. J. Green" and the second appears to be "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 FY26 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 via the Chief Executive Officer 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, events, 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.
- Anti-Harassment & Anti-Bullying policy – sets out the steps we'll take to investigate and deal with complaints of bullying or harassment, and how we support those affected.
- 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 may arise within supply chains where procurement practices are inadequate or inappropriate. We source electronic equipment from reputable global brands with established sourcing controls. However, we recognise that residual risk remains where products may originate from countries with employment standards below those of the UK. Nominet's highest-risk procured services relate to 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 for Nominet are where Service delivery partners operate 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 or child labour in our business or wider 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). 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 to gather 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, Information Security and Sexual Harassment Awareness 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.
- Mandatory refresher training for all employees is delivered periodically covering topics such as Business Continuity, GDPR, Health and Safety, and Information Security training.

OUR ACHIEVEMENTS

In our previous Modern Slavery Statement for FY25 we committed to:

- Deliver our programme of due diligence activity and make further improvements.
- Deliver 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.
- Identify and investigate any potential new risk areas as they arise.
- Continue engagement across our business to share and learn insights about mitigating Modern Slavery risks.
- Refresh training and guidance on procurement practices for employees and managers with direct responsibility for supply chain management.
- Continued KPI reporting.

We are pleased to share the progress we have made on these commitments. During FY26 we:

- Strengthened the supplier due diligence processes run by the Procurement Review Board and migrated to a new and enhanced third party risk management solution.
- Used the Nominet ESG measures, alongside the traditional financial competitiveness measures, when procuring services.
- Launched a new Procurement SharePoint site that provides a one-stop-shop for information and guidance for employees looking to procure a new service or onboard a new supplier.



- Reported on KPIs relating to effective governance and control and continued to assess the effectiveness of our activities to combat slavery and human trafficking.

OUR COMMITMENT TO COMBATING SLAVERY AND HUMAN TRAFFICKING

During the current financial year ending 31st March 2027, 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:
 - Extending training and awareness activities to staff directly involved in procurement and contract negotiation.
- Identifying and investigating any 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 FY26 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 1 April 2025 to 31 March 2026.