

## **RWM Modern Slavery & Human Trafficking Statement 2020-2021**

We are committed to preventing modern slavery and human trafficking in any part of our business or supply chain; we aim to take sustained and concerted action against such acts.

In addition, as an employer, RWM is committed to Equality, Diversity & Inclusion and we aim to create and ensure a respectful and non-discriminatory working environment for our staff. We want all our employees to feel confident that they can expose wrongdoing without any risk to themselves.

Radioactive Waste Management Limited's (**RWM**) Modern Slavery and Human Trafficking Statement for 2020-21 offers RWM the opportunity to report on progress of activities previously identified alongside planned next steps, since the publication of its first Statement last year.

### **Organisation's structure and business**

RWM is a wholly owned subsidiary of the Nuclear Decommissioning Authority (NDA) and is responsible for planning and delivering geological disposal of higher activity radioactive waste in the UK. This includes finding a suitable site with a willing community to host a permanent, safe and secure solution for managing radioactive waste. RWM's activities are primarily planning and design-based but, as our mission progresses, will focus more on construction and operation activities.

### **Our supply chains**

Our supply chains include large multinational organisations, publicly-owned bodies and universities as well as a range of small and medium sized suppliers. The vast majority of our supply chain currently provide professional services, such as consultancy. However, we are already expanding into construction related activities (for example, drilling and geophysical survey activities are underway) and this will accelerate; we therefore need to take a proactive approach to combatting modern slavery and human trafficking risks that arise in those sectors. This is recognised in our plans below through the development of risk assessment tools to identify future procurements that may be high-risk in relation to any form of slavery or human trafficking and the creation of toolkits to equip staff to manage these.

### **Our policies on slavery and human trafficking**

We are fully committed to ensuring that no modern slavery or human trafficking takes place in any of our supply chains or in any part of our business. To make sure we do this, we have undertaken and continue to undertake significant amounts of planning work to ensure we shape and manage our GDF programme appropriately. Our previous statement mentioned the intention to produce a supplier charter; we have now developed this and it will shortly be ready for publication. Alongside a range of other areas, it includes expectations required of our suppliers and ourselves to prevent modern slavery

in all of its forms in our businesses and our supply chains. Our suppliers will be invited to sign the charter and links to it will be included in all future tender documentation.

Our existing whistleblowing policy also provides a reporting method for our staff and others to alert us to any concerns they may have, including those relating to modern slavery.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we undertake high-level due diligence whenever we procure. This requires suppliers to self-certify their compliance with modern slavery and human trafficking legislation. We aim to implement further risk-based assessments as set out below.

### **Training**

Our Commercial team have undertaken training on Modern Slavery through the Chartered Institute of Purchasing & Supply (CIPS) and the Supply Chain Sustainability School.

### **Other Progress**

- An audit programme of key suppliers is in place which will incorporate the questions from the Modern Slavery Assessment tool (MSAT is a modern slavery risk identification and management tool designed by the Home Office to help public sector organisations work with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains). Audits will include the policies & processes that providers have in place relevant to the prevention of modern slavery; their understanding of the modern slavery risks in their supply chains and how these are managed; and their purchasing practices.
- A review of contract terms is underway (to include ensuring effective remedies in place where instances of Modern Slavery are detected).

### **Next steps**

In addition to the above, we also plan to deliver the following actions:

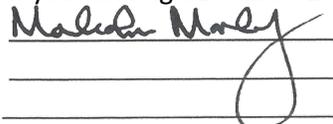
- Extend awareness training of Modern Slavery and Human trafficking to all Contract Managers across RWM.
- Continue to develop our links across a range of organisations to improve our knowledge & collaboration in key sectors (including Stronger Together; Gangmasters & Labour Abuse Authority - GLAA). We will benchmark the activities we have undertaken against similar organisations and act on the lessons learned.

- Develop a user-friendly risk assessment tool for identification of procurements and contracts that may be high-risk in relation to any form of slavery or human trafficking. Our highest risk contracts will form the basis of a rolling programme of audits.
- This will be supplemented by the roll out of the MSAT tool across a broader group of contracts (the tool asks suppliers questions about the processes they have in place for managing modern slavery risks and provides automated recommendations on how to improve their anti-modern slavery processes).
- Develop a toolkit to inform and equip staff to tackle modern slavery in future high-risk sectors they will become exposed to. We will use and adapt high quality existing resources to support this (e.g. 'Tackling Modern Slavery in Government Supply Chains', developed by the Government Commercial Function)
- Existing tender documentation already includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act. As well as ensuring this is effectively verified, we will also include requirements (proportionate to the risk) in our contract specifications. As part of our contract management we will develop KPIs to monitor supplier progress against managing modern slavery risks.
- Update RWM's Procurement procedure to include Modern Slavery section.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2021. It was approved by the board on [                      ].



Karen Wheeler  
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Radioactive Waste Management



Malcolm Morley  
Chair of the Board of Directors  
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