



SELLAFIELD LTD

Supplier Code of Conduct

This code is intended to guide us as Sellafield Ltd employees and guide our supply chain colleagues in respect of modern slavery. It encompasses our expected compliance with the Modern Slavery Act 2015 and ultimately our joint commitment towards defeating modern slavery, whilst protecting human rights.

The Modern
Slavery Act 2015

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A message from the Sellafield Ltd Modern Slavery Act 2015 Champion

As you may be aware, the Modern Slavery Act 2015 is aimed at combating crimes of slavery and human trafficking and it recognises that businesses, including Sellafield Ltd and its extended supply chain have a major role to play in tackling these crimes.

As an organisation we continue to disclose the steps we are taking to ensure that slavery and trafficking is not taking place in any of our immediate supply chain companies, but of equal importance, that also includes the extended further range of suppliers.

Whilst I have every confidence that our immediate supply chain companies are upholding the values and standards expected of the Act, we continue to work with a number of suppliers so that they can provide further assurance where risks may potentially be higher, especially in the lower tiers or from where raw materials are geographically sourced.

As a current or potential Sellafield Ltd supplier I encourage you to take time to read through this document and to gain some knowledge of the steps we are taking as an organisation to eradicate Modern Slavery.

I also encourage you to draw upon the information to further improve your own businesses.



Robert Astall
Sellafield Ltd
Head of Capability and Assurance
Modern Slavery Act 2015 Champion



1. Overview of the Modern Slavery Act 2015

A) Our Supplier Code of Conduct

This code is intended to guide us as Sellafield Ltd employees and guide our supply chain colleagues in respect of modern slavery. It encompasses our expected compliance with the Modern Slavery Act 2015 and ultimately our joint commitment towards defeating modern slavery, whilst protecting human rights.

We all have a duty of care to conduct business in a responsible professional manner, that's why it is of extreme importance that Sellafield Ltd and its suppliers remain vigilant and continuously improve in order to prevent modern slavery occurring.

B) What is Modern Slavery

Modern Slavery is a crime resulting in the abhorrent abuse of human rights. The Modern Slavery Act 2015 provides details of the full definition, but it can be summarised as, 'slavery, servitude and forced or compulsory labour and human trafficking'.

The full Modern Slavery Act 2015 legislation can be found via the following link:

http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf

C) What does it mean to Sellafield Ltd and our suppliers

As a legislative Act, the UK Government fully expects Sellafield Ltd to comply and develop appropriate and effective steps to ensure slavery and human trafficking is not taking place. As a result of this, Sellafield Ltd expects all current and potential new suppliers to adopt a similar approach with related ethics and measures to prevent modern slavery occurring within their companies and those of their extended supply chain.

This allows Sellafield Ltd, its suppliers and their extended supply chain to collectively provide demonstrable healthy challenge and full transparency in support of the Act.

Full compliance with the Act focusses our minds to ensure we have a number of defence mechanisms in place; these are covered more fully in sections G and H of this guide. One of the most important areas of the Act however is the expectation that Sellafield Ltd as an organisation (under section 54) must legally produce an annual Modern Slavery Act Statement which is endorsed by our Chief Executive Officer and published on our Sellafield website.



This annual statement provides details of how we deliver business and the steps we take in ensuring that modern slavery is not occurring in Sellafield Ltd, its supply chain or their extended supply chains.

The Sellafield Ltd 2018 Modern Slavery Act Statement can be found via the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/715933/Modern_Slavery_Act_2017_2018_Annual_Statement_.pdf

D) Everyone is responsible, everyone is accountable

The Sellafield Ltd Code of Responsible Business Conduct reinforces our expectations of each other at all times and is a commitment that is cascaded through to our supply chain colleagues. The Modern Slavery Act 2015 recognises that through business, everyone is responsible in promoting ethical business practices and policies that protect workers from being abused or exploited.

Sellafield Ltd expects current and potential new suppliers to adopt the same Modern Slavery Act 2015 edicts and to work to the same principles of Sellafield Ltd in support of the Act.

The full Sellafield Ltd Code of Responsible Business Conduct can be found via the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628091/SLM-3.05.01.Code_Business_Conduct.pdf





E) Supporting our collaborative Modern Slavery Act mission

Sellafield Ltd continues to work in partnership with its supply chain under a One Sellafield philosophy and this includes a collaborative mission of following a rationalised and coordinated approach towards overcoming modern slavery.

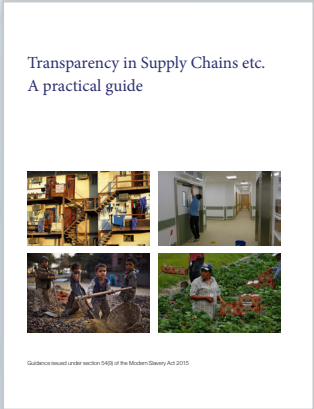
This rationalised approach means that modern slavery act obligations and governance are visible to all prospective suppliers that are working in support of Sellafield Ltd and/or are tendering for business:

- Pre-qualification and full tender question modern slavery awareness
- Mandated modern slavery supplier terms and conditions

This approach is seen as a key enabler committing us all towards aligned Modern Slavery Act principles whilst adhering to the specific requirements of the Act.

Further information and assistance can be found via the following Modern Slavery Act practical guide:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf



2. Our Modern Slavery Act 2015 Focus

F) Our strategic approach to Modern Slavery

Year on year Sellafield Ltd has strengthened its processes and policies in line with the Modern Slavery Act expectations and through the adoption of a number of initiatives, thereby furthering a zero tolerance approach from within our own organisation and those of our supply chain.

The Sellafield Ltd Anti-Slavery and Human Trafficking Policy can be found via the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628267/SLCP-4.06.06-1.pdf

As a priority Sellafield Ltd continues to carry out invasive annual health checks of the following pre-existing documents to ensure prevention and enforcement of the Act:

- Code of Responsible Business Conduct
- Supply Chain Management Policy
- Fraud Prevention and Anti-Bribery and Corruption Policy
- Reporting of Concerns (Whistleblowing) Policy
- How do I report concerns? (Whistleblowing)
- Conduct and Compliance Policy
- Sellafield Ltd Human Resource Policy
- Contract Quality Requirement Manual

Our Conduct Compliance Officer has continued to drive awareness and observance of our Code of Responsible Business Conduct and Whistleblowing Policy, both of which are published via our company website. This allows individuals from within the company or supply chain to raise concerns relating to modern slavery with the confidence of anonymity and without fear of reprisal. All reports of modern slavery are fully investigated and appropriate remedial actions taken.

G) Modern Slavery - a risk based approach

Sellafield Ltd commercial and legal continues to use a risk based approach to modern slavery in order to satisfy legal requirements whilst underpinning our own standards and expectations.

We continue to observe the United Nations Guiding Principles on Business and Human Rights, (UNGPs), the UK Government Home Office Guidance Paper issued under section 54 (9) of MSA 2015 and the Global Slavery Index 2018, all of which provide direction to our due diligence activities.

As a company we continually consider the risk of modern slavery occurring in our own operations and we have continued to complete risk assessments of our supply chain using a range of risk criteria (including vendor types, categorisation of spend profile, geographies, documentation, financial risk level and associated risk levels) that has provided a risk ranking. This allows us as a business to focus ongoing efforts on our own internal operations and likewise, of those immediate supply chain partners and their extended suppliers.

As a result, our Modern Slavery Action Plan drives the Sellafield Ltd governance procedures.

H) Our Action Plan - assurance and governance

In order to provide Sellafield Ltd with a strong level of assurance and to prevent slavery and trafficking in our business and supply chains, we continue to complete a number of process staged supplier assessments in order to lay the foundations of an embedded zero tolerance approach. This includes working with supply chain companies, investigating their policies, adherence to governance and how we collectively share learning and experience.

The Sellafield Ltd Action Plan includes:

- A managed risk based list of suppliers
- Details of the level of supplier testing/auditing required
- Supplier modern slavery questionnaires and feedback information

The in person interview notes, completed questionnaires and communications are logged to support transparency and to demonstrate our collaborative engagement, with our suppliers with respect to modern slavery. The results of the assurance and governance also allow Sellafield Ltd to judge if any further necessary actions are required.

To date, there has been no evidence of Modern Slavery occurring within Sellafield Ltd or its supply chain however a collaborative focus continues to be in place.

I) Supporting our people

From a procurement and organisational point of view, modern slavery can be difficult to identify in the early stages of procurement or to recognise the signs of it through the depth of extended supply chains. As a result Sellafield Ltd is employing an ongoing programme of education and training.





To ensure our commercial practitioners are suitably qualified and have the necessary working awareness of modern slavery, all of those persons with procurement delegated power are trained and tested against a mandated computer based training course. The course is part of a suite managed by the Chartered Institute of Procurement and Supply on behalf of Sellafield Ltd and covers Ethical Procurement and Supply 2017, to which we train and demonstrate our obligations against the Modern Slavery Act.

This mandated course is based on a rolling annual refresher being taken by all responsible persons. Similarly senior management within Sellafield Ltd have received Modern Slavery awareness training from external legal experts.

As a responsible organisation Sellafield Ltd strongly encourages current and potential future suppliers to adopt a training regime for its own identified employees. A number of Modern Slavery Act training modules are available via the internet offering varying levels of education, training and costs.

Are you a responsible employer?

J) Reporting concerns

Sellafield Ltd employees are provided with reporting guidance from the Code of Responsible Business Conduct (as detailed in section D), however suppliers in general have numerous guidance alternatives.

If you as a supplier suspect any forms of Modern Slavery we would suggest exploring your own business guidance policies and the opportunity to use Safecall which is treated in confidence:

<https://www.safecall.co.uk/>

Sellafield Ltd is fully supportive of total adherence to the Modern Slavery Act 2015, its integrity and the collective aims of eradicating modern slavery.

We also expect our supply chain and their extended suppliers to commit to these aims.

K) Useful information

The following links provide extra supportive information.

United Nations Guiding Principles on Business and Human Rights:

<https://www.business-humanrights.org/en/un-guiding-principles>

Global Slavery Index 2018:

<https://www.globalslaveryindex.org/>

Walk free Foundation

<https://www.walkfreefoundation.org/>

Information related to Modern Slavery training:

<https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>



Sellafield Ltd

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