

Sellafield Ltd - Modern Slavery Annual Statement 2022

Sellafield Ltd has published this statement in accordance with the Modern Slavery Act 2015.

Introduction

Modern Slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Modern Slavery Act (MSA) requires any organisation with a global turnover of £36m or above and that is operating in the United Kingdom to produce an annual statement. This statement builds on previous Sellafield Ltd statements and provides details of the steps that have been taken during the financial year, ended 31st March 2022 to ensure that modern slavery isn't taking place within any part of the organisations business or within its supply chain.

"During this financial year, Sellafield Ltd have not identified any evidence of modern slavery occurring within its business or within its extended supply chain"

This statement is made on behalf of Sellafield Ltd who are a subsidiary of the Nuclear Decommissioning Authority (NDA), who own the Sellafield site, its liabilities, and assets and who work in partnership with Sellafield Ltd. The NDA are a government led department controlled via the Department for Business, Energy, and Industrial Strategy.

Our commitment

Modern slavery will not be tolerated by Sellafield Ltd and as such, we are committed to doing business in a fully transparent and responsible way. This level of commitment cascades through our own organisation and into our supply chain, where we expect the same level of commitment from suppliers.

Our business

From cleaning-up the country's highest nuclear risks and hazards to safeguarding nuclear fuel, materials and waste, our mission is of national importance. Our purpose is to keep Sellafield safe and secure, cleaning-up the site to a defined end state. Our work streams include:

- **Retrievals:** we are retrieving nuclear waste, fuel and sludge that are stored inside our legacy ponds and silos, the highest risks, and hazards at Sellafield
- **Remediation:** beyond the legacy ponds and silos, we have a vast amount of nuclear and non-nuclear facilities at Sellafield that need to be decommissioned and cleaned-up
- **Spent nuclear fuel management:** we currently reprocess spent nuclear fuel. That means taking the fuel that has been used inside a nuclear power station and extracting the individual component parts of plutonium, uranium, and waste.

- Special nuclear materials: we have the facilities and expertise to provide safe, secure, and appropriate storage for special nuclear materials

Work at Sellafield is subject to permitting by the Office for Nuclear Regulation, the Environment Agency and under scrutiny by the National Audit Office and Public Accounts Committee. During the Financial Year, Sellafield Ltd incurred costs of £2363.5million (2021: £2,082.4million). This expenditure was recoverable from the NDA, and represents the operational and workstream costs of Sellafield Ltd.

To find out more about Sellafield Ltd please go to:

<https://www.gov.uk/government/organisations/sellafield-ltd>

Our people

Sellafield Ltd employs circa 11,300 staff supplemented with ~ 500 agency workers. The highest proportion of staff are based on the Sellafield site and are also working flexibly from other significant off-site offices local to Sellafield and other locations in the Warrington area.

Our supply chain

Sellafield spends approximately £1.4bn per annum with its supply chain, which includes UK and global companies. During the financial year, 91% was spent with large, long term supply partners and the tail spend equated to 9%, which includes small to medium sized organisations. Our MSA principles and inbuilt transparency is evident within that diverse supply chain which can be categorised as:

Category Descriptor	Category Descriptor
materials (raw and commodity)	construction
plant and equipment	R&D activities
IT services	sub-contracting
labour and hire	decommissioning
business costs	professional services

Our supplier contracts and agreements reflect the cascade of our 'One Team' approach and commitment to acting ethically and with integrity in all our business relationships. This is underpinned with the implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chain. As a minimum, we require our suppliers to:

- Implement due diligence procedures for their own supply chains
- Use reasonable endeavours not to purchase raw materials, resources and/or products from organisations using forced labour

We work with suppliers through our Supplier Relationship Management (SRM) programmes and contract management meetings offering support to them, whilst ensuring that any reports featuring any aspect concerning or including modern slavery are fully investigated with appropriate remedial actions being taken.

In recognition of the importance of the MSA, our Sellafield supply chain directorate continues to have a nominated modern slavery champion who provides guidance, assurance, and a

reporting line, if required to the directors. Our focus continues in ensuring that we are doing all that we can to avoid modern slavery occurring.

Our policies

As a company we procure internationally and as a result we must ensure that we exercise our attention towards vigilance and embedding processes that drive a commitment to continuous MSA best practice and learning.

Transparency is central to our collaborative approach and this is achieved by using a wide range of internal and external platforms where our policies are located and visible. Our policies, practices, processes, and tools are all driven with the desire to minimise MSA risk to our business, but more importantly, the risk to those individuals that may potentially be caught in the grip of modern slavery.

Policies:

- Sellafield Code of Responsible Business Conduct
- Supply Chain Management Policy
- Fraud Prevention and Anti-Bribery and Corruption Policy
- Sellafield Anti-Slavery and Human Trafficking Policy
- Conduct and Compliance Policy
- Sellafield Ltd Human Resource Policy

Our safeguarding policies shown via the links below include specific guidance to staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour and how to respond to issues, whilst escalating any concerns. These ensure that our staff know what is expected of them and how we can work together to eradicate modern slavery.

[Code of Responsible Business Conduct EXT .pdf \(publishing.service.gov.uk\)](#)
[Supplier Code of Conduct 2018.pdf \(publishing.service.gov.uk\)](#)
[Reports and Concerns \(Whistleblowing\) Policy \(publishing.service.gov.uk\)](#)

Sellafield Ltd continue to operate an open-door approach allowing 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.

Our management and risk-based approach

During 2021, Sellafield Ltd revisited its modern slavery risk assessment programme to allow itself a health check of current MSA practices and measures of effectiveness, noting any potential supplier changes. The approach once again used the globally recognised HMG MSA Areas of Concern Identifiers.

During a year of supplier challenges caused by the continued C-19 pandemic, Sellafield Ltd continued to safely adapt and there was no evidence of heightened risk within our business. We have continued to track and monitor due diligence reviews as part of our post contract management processes and SRM programme.

During this financial year we have:

- Observed and responded to Cabinet Office Procurement Policies – Tackling Modern Slavery in Government Supply Chains
- Delivered yearly mandatory training modules to Sellafield Ltd commercial staff which includes specific programmes covering modern slavery and ethical procurement and supply
- Used industry wide modern slavery knowledge to complete our own self health checks within the business
- Registered and uploaded our MSA annual statement to HMG Modern Slavery Registry Service
- Undergone internal Sellafield risk audit to ensure we continue to provide risk mitigation measures and compliance
- Used available market knowledge to continue to assess MSA trends and themes
- Worked with the wider NDA team to cross check estate wide MSA alignment

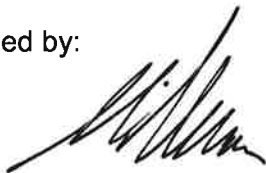
As we look forward, Sellafield Ltd will continue to strengthen its approach to managing the risks of modern-day slavery occurring within its direct business and within its supply chain.

We intend to carry out work in the following specific areas:

- Continue to explore the position of imposing sanctions on suppliers who have been found to have modern slavery act issues/challenges – as aligned with Cabinet Office directives
- Make further improvements to organisational/management/procurement systems and procedures if gaps, risks, and opportunities arise
- Continue to provide coaching and mandatory training programmes to our staff
- Support and implement supplier corrective action plans if required

This statement refers to the financial year ending 31st March 2022 and has been approved by the organisations board of directors.

Signed by:



Dated: 14/6/2022

Martin Chown, Chief Executive Officer
Sellafield Ltd