

Modern Slavery Act

Policy statement 2022/23

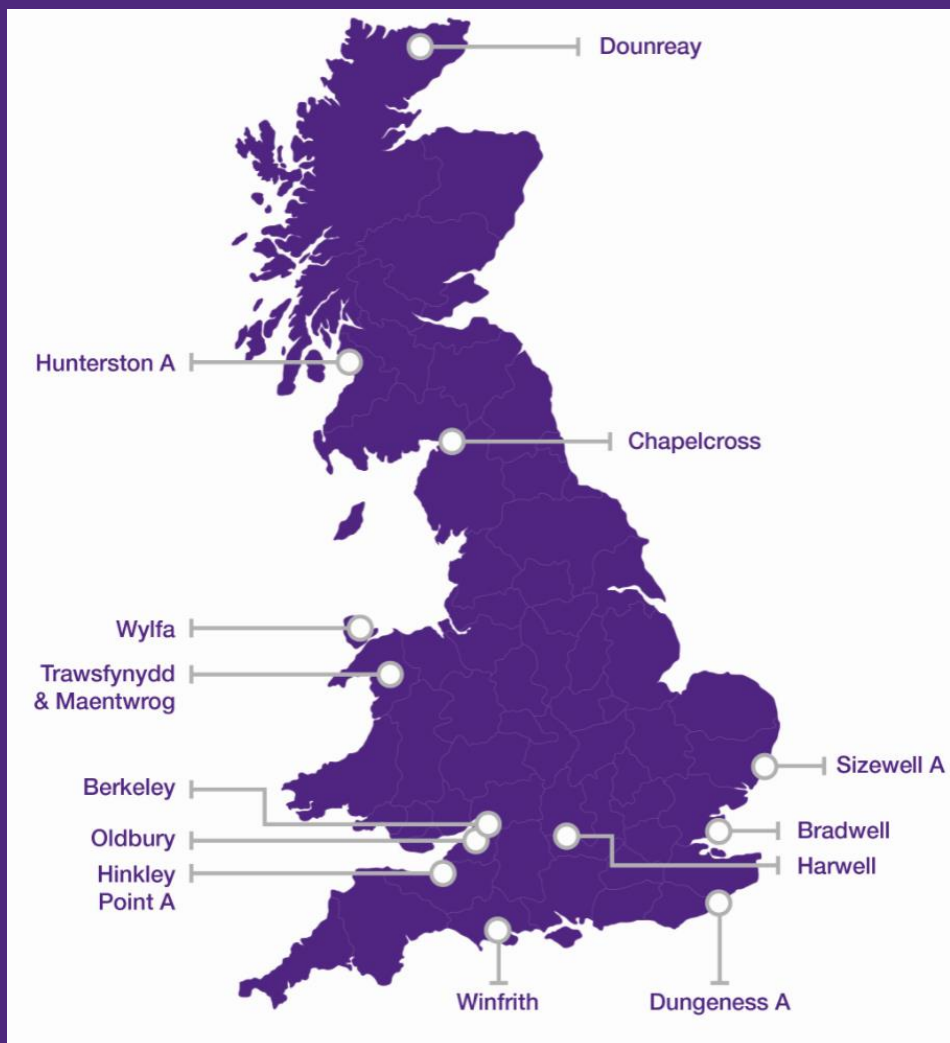


Introduction

Magnox Limited is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain.

The Modern Slavery Act 2015 (the Act) requires organisations with a global turnover of at least £36 million to publish an annual slavery and human trafficking statement disclosing what steps are being taken to ensure modern slavery is not taking place in any of its business or supply chains.

This statement sets out our position on modern slavery and human trafficking, how we are currently addressing the risk and our objectives for the next financial year.



Who is Magnox Limited?

Magnox Limited is a wholly owned subsidiary of the Nuclear Decommissioning Authority. Licensed under the Nuclear Installations Act 1965 and holder of the licence for 12 nuclear sites and one hydro-electric plant, we are the legal entity responsible for the following sites, which are owned by the Nuclear Decommissioning Authority (NDA):

Berkeley; Bradwell; Chapelcross; Dungeness A; Harwell; Hinkley Point A; Hunterston A; Maentwrog; Oldbury; Sizewell A; Trawsfynydd; Winfrith and Wylfa.

As a division of Magnox Limited from 1 April 2023, Dounreay is responsible for the clean-up and demolition of the former centre of fast reactor research and development.

Our workforce is around 4440 people, comprising a mix of 3969 direct employees, 273 agency supplied workers and 198 contract supplied workers.



Responsibilities

We are responsible for ensuring that our activities are carried out:

- safely, securely, and predictably, with due regard for the environment.
- to the satisfaction of the Nuclear Decommissioning Authority; and
- in the long-term interests of our organisation, our employees, the local communities, and our supply chain partners.

What we do

We manage our sites through their lifecycles, overseeing all aspects of operation, defueling and decommissioning.

Our Mission

Our mission is to safely and securely deliver our sites to closure with a workforce:

- focused on achieving value for our customers and the taxpayer,
- motivated to deliver the site closure programmes; and
- with clear future employment opportunities.

How we do it

Our primary goal is to protect people and the environment; we work hard to minimise the environmental impact of our operations.

We engage with our stakeholders to seek the widest possible approval of how we manage our environmental responsibilities.

Our values guide us - they are essential for the business and underpin everything we do.



Our Values

Safety – keep everyone safe; this is our core value. We always put safety and the environment first and strive for continual improvement.

Trust – do the right thing; we build mutual trust because we:

- act according to the principles that we believe in,
- are open and timely in communications and interactions,
- create positive experiences,
- measure our success by the success of our customers, regulators, suppliers, stakeholders, and colleagues,
- do everything to be the best at what we do; and
- establish challenging but achievable goals and deliver what we promise.

Care and respect – look after one another; the business relies on employees working together towards mutual success.

We respect each other, honour opinions and ideas and look after each other's personal growth, development, and success.

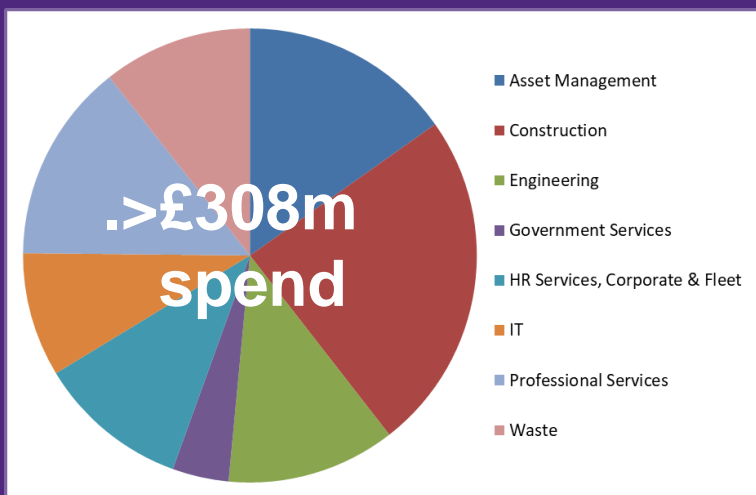
We deliver our mission to decommission and clean-up our sites by engaging world-leading expertise through our supply chain.



Our supply chain

We recognise that modern slavery and human trafficking can exist in the supply chain. We require all our suppliers to adhere to the same high standards that we adopt, with many of our suppliers also meeting the requirements of the Act in their own right and publishing their own modern slavery and human trafficking statements. During the last financial year, Magnox Limited has not identified any evidence of modern slavery or human trafficking occurring within our organisation or our supply chain.

Magnox sites supply chain

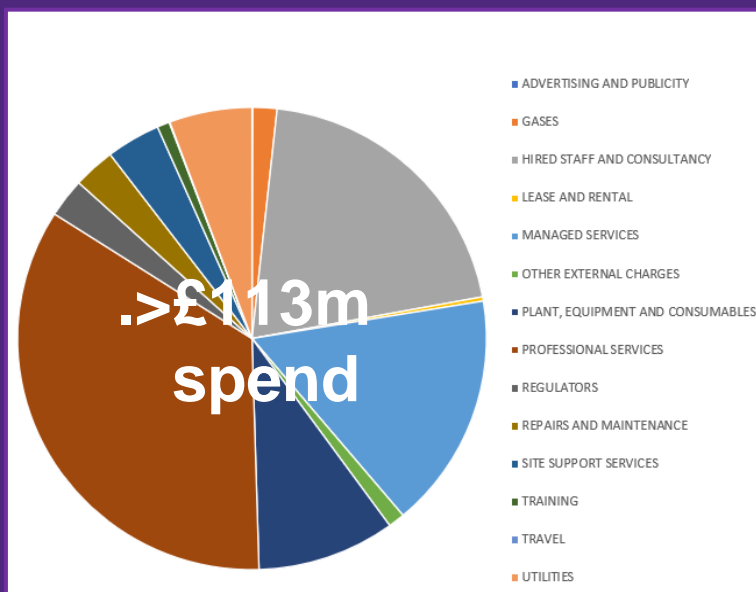


837 suppliers

471 small and medium enterprises

8 categories

Dounreay supply chain



678 suppliers

401 small and medium enterprises

14 categories

Our activities to combat modern slavery and human trafficking are risk-based and correspond to the level of risk identified; we believe that this approach is proportionate and appropriate. In the main our suppliers work in low-risk areas. Much of our expenditure is high value engineering, civil engineering, assurance, and consultancy services. Where we purchase manufactured goods, they are frequently of a specialist nature.

Many of our routine purchases of consumable goods are made through Crown Commercial Services or other framework contracts and government-procured supply chains. Our procurement activities take place within the UK and our contractors and suppliers are predominantly UK and EU-based.

Our employees occasionally stay in UK hotels when conducting business away from the office. Accommodation and travel arrangements are organised through a government-procured travel agent with a publicly stated risk-assessed supply chain procedure.

Speak up

Magnox Ltd is committed to dealing responsibly, openly, and professionally with any genuine concern that employees may have about malpractice, whether it be danger to themselves or others, financial irregularities, breach of legal obligations or damage to the environment.

The company is committed to ensuring that employees will suffer no recrimination or victimisation as a result of raising a genuine concern. This applies even if the concern later proves to be unfounded.

Employees are encouraged to raise concerns at an early stage rather than waiting for complete proof. Employees wishing to raise issues which are not covered by the Public Interest Disclosure Act 1998, but which are nonetheless a cause for concern, should speak to their line manager, Human Resources (HR) business partner or Trade Union representative, who will advise on the appropriate approach to take.

Magnox Ltd also maintains a completely confidential service, through SafeCall, for all our employees, our agency supplied workers, and contractors to report any matter of concern they observe or hear that cannot be reported to a line manager or HR for whatever reason. Full details about SafeCall can be found on their website www.safecall.co.uk, which is also the route to make a direct report.

Progress

Magnox Limited has delivered on the following during the financial year 2022/2023:

- Developed a new Supplier Code of Conduct.
- Launched the Magnox Sustainability Policy which includes commitments to leveraging social value in our procurement and partnering with suppliers who share our sustainability objectives, increasing our impact.
- Recognises the potential links between fraudulent activity and modern slavery and has developed and implemented a Counter Fraud Policy.
- Followed resourcing and employment procedures to ensure that all staff have a right to work in the UK.
- Provided access to support and a range of wellbeing resources to enable a person experiencing difficulties outside of work to report their situation or enable them to access free, independent, and confidential advice.
- Worked collaboratively with the NDA group to develop a strategy on social value.
- Our Modern Slavery Champion continues to monitor risk and drive improvement within this area via our audit and risk processes.
- Reviewed and, where necessary, updated our policies and manuals in relation to modern slavery.
- Put monitoring arrangements in place to ensure that all employees are paid the National Minimum Wage.

Future steps

We are committed to integrity in all aspects of our business and operations and to provide all our products and services in compliance with legal requirements and to high standards of corporate responsibility.

We also work with our supply chain to ensure we operate from a shared set of values and develop business relationships based on honesty, fairness, and mutual trust.

The Magnox Board recognises modern slavery and human trafficking as both crimes and violations of fundamental human rights. We are committed to implementing and

enforcing effective systems and controls to ensure that these practices are not taking place anywhere in our own business or in our supply chain.

The following actions remain in progress for 2023/24:

- Further develop our guidance for social value, which includes Modern Slavery.
- Review current modern slavery training.
- Communicate our Supplier Code of Conduct to the entire supply chain.
- Develop a supply chain assurance process which includes Modern Slavery.
- Continue to review policies and procedures to mitigate risk in the supply chain.
- Continue to work with key suppliers to ensure progress is being made towards becoming real living wage employers, as set by the Living Wage Foundation.

We are committed, alongside the NDA group, to preventing modern slavery and human trafficking in any part of our business or supply chain. It is absolutely the right thing to do, and we aim to take sustained and concerted action against such acts.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Magnox Limited's slavery and human trafficking statement for the financial year ending 31st March 2023.

I am confident that the actions Magnox Ltd is taking are effective and appropriate to meet our commitments in preventing modern slavery and human trafficking in our business.



A handwritten signature in black ink, appearing to read 'Rob Fletcher', with a long horizontal stroke extending to the right.

Rob Fletcher,
Chief Executive Officer, Magnox Limited
June 2023