

PERIOD COVERED BY THIS STATEMENT:

01 April 2024 to 31 March 2025

1. Introduction

This statement is made by Great British Energy - Nuclear (GBE-N) in accordance with Section 54 of the Modern Slavery Act 2015. Although we are not required to publish a Modern Slavery Statement due to our annual turnover being under £36 million, we are making this statement voluntarily. This reflects GBE-N's commitment to preventing modern slavery and human trafficking within our business and supply chain and outlines the steps we are taking to identify and address these risks.

2. Organisation Structure

GBE-N is an executive arm's-length body, of the Department for Net Zero and Energy Security with statutory powers designated to it under the Energy Act 2023. GBE-N are responsible for delivering the government's long-term nuclear programme and supporting the government's ambition to deliver up to 24GW of nuclear power in the UK by 2050.

GBE-N teams operate across England, Wales and Scotland, with our main headquarters in Warrington. GBE-N works closely with Government and industry partners to lead and coordinate the delivery of the government's new nuclear programme.

GBE-N's core values Trust, Care, Collaboration, Challenge and Drive are fundamental to how we conduct and govern our business.

Additional information about Great British Energy - Nuclear can be found [online](#).

3. Business

GBE-N's primary purpose is to facilitate the design, construction, commissioning and operation of nuclear energy generation projects, in line with policies published by His Majesty's government.

The three main elements of GBE-N's role are as follows:

- **Deliver:** We are delivering the government's nuclear programme by advancing projects that meet the UK's energy needs and create growth.
- **Enable:** We create the enabling conditions, in particular financial, regulatory, and supply-chain, essential for successful delivery of nuclear projects.
- **Advise:** Drawing on our technical, commercial and financial expertise, GBE-N provides strategic, evidence-based advice to guide nuclear policy. Our advisory role assists policy decisions so that they reflect practical delivery considerations and opportunities, to help shape the UK's nuclear sector.

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4. Supply Chains

GBE-N manages a contract portfolio across 59 suppliers. One supplier is based in the US, and the rest are in the UK.

All current contracts are categorised as low risk in terms of modern slavery.

- **GBE-N due diligence processes in relation to slavery and human trafficking in our business and supply chains:**

GBE-N is committed to working with partners who share our dedication to eradicating modern slavery.

Our expectations are outlined in the Crown Commercial Services Supplier Code of Conduct which mandates compliance with all applicable human rights legislation, including the Modern Slavery Act 2015. In addition, suppliers must have robust means of confirming that the subcontractors in their supply chain also comply.

Our approach to due diligence and assessing modern slavery risk within our supply chain aligns with *Procurement Policy Notices PPN 02/23: Tackling Modern Slavery in Government Supply Chains*. We employ a risk-based assessment: categorising contracts as High, Medium or Low risks. This informs and prioritises necessary actions to control the risk of modern slavery and human trafficking.

New Procurement Actions:

For each new procurement process, GBE-N:

- Utilises the Risk Assessment of Modern Slavery (RAMS) tool, to identify contracts which are high or medium risk of modern slavery based on industry type, complexity of supply chain, the nature of the workforce, context in which the supplier operates, type of commodity and supplier location.
- Designs new procurements according to the associated risk level including applying the Social Value Model where appropriate.
- Considers the mandatory and discretionary exclusion grounds as set out in the Standard Selection Questionnaire.
- Applies tender response questions related to modern slavery in a proportionate manner.
- Includes specific terms and conditions to strengthen contractual protection where necessary.

Existing Contract Actions:

As part of our contract management process, GBE-N will:

- Continually collaborate with suppliers, post-award, to address modern slavery risks and monitor progress.
- Implement action plans to control identified risks.
- Understand the supply chains of those contracts to assess specific risks.
- Work with suppliers on high and medium risk contracts to control risks through strengthened contract management.

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- Repeat this risk assessment annually for high-risk contracts and periodically for medium risk contracts.

Actions should Modern Slavery be identified:

- Should GBE-N identify a victim of modern slavery, we will notify law enforcement agencies. Where we believe someone is in immediate danger, and they are in the UK, we will contact the police via emergency services.
- Whenever it is appropriate we will work with suppliers to address instances of modern slavery, agreeing on action plans and contract management activities.
- If appropriate we may terminate the contract after considering the potential impact on vulnerable and at-risk victims.

- **GBE-N business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk:**

During the reporting period, no contracts were identified as medium or high-risk, and no issues were flagged.

5. GBE-N Recruitment

GBE-N's workforce comprises of skilled practitioners and experts, a large proportion of which are seconded from other companies or provided by consulting firms, making the risk of modern slavery low. Those organisations are subject to the same risk assessment and procedures as all other suppliers.

Additionally, everyone working at GBE-N undergoes background screening, identity verification, and, where necessary, appropriate security clearance, prior to onboarding in line with standard public sector recruitment protocols.

6. GBE-N Policies on Slavery and Human Trafficking

- **Anti-Slavery and Human Trafficking Policy** - sets out the guidance that must be followed to ensure we conduct our business in a manner that complies with the Modern Slavery Act (2015) and Public Procurement Notices PPN02/23: Tackling Modern Slavery in Government Supply Chains.
- **Code of Ethical Conduct** – outlines the legal obligations and ethical principles we stand by and commits GBE-N to conducting business in a way that respects the human rights of our colleagues and those we work with.
- **Responsible Commercial Policy** – sets out the core principles that GBE-N follows in all its commercial activity. This includes ethical sourcing and working to eliminate modern slavery and labour exploitation from our supply chain.
- **Social Value Procedure** – states that where procurements are considered Medium or High risk for modern slavery, Modern Slavery risk management must either be included in the contract requirements, or the Model Award Criteria (MAC) 6.3 be included in the evaluation (MAC6.3: tenderers are required to demonstrate action to identify and manage the risks of modern slavery in the delivery of the contract, including in their supply chain).

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- **Speak Up and Whistleblowing Policy** – our Speak up Policy and Procedure encourages the reporting of concerns relating to abuses of human rights (including modern slavery). Reports can be made internally to Line Managers, relevant subject matter experts, the Head of Ethics or any member of the Executive Team, or externally, using the independent SafeCall service. GBE-N is committed to ensuring that concerns raised will be dealt with appropriately, consistently, fairly, professionally and in a timely manner.

No concerns relating to modern slavery were identified and/or raised during this reporting period.

7. GBE-N Training on Modern Slavery

- All staff are required to complete a short introductory training video on modern slavery, human trafficking and labour exploitation.
- GBE-N's Commercial teams are required to complete Government Commercial College Training on tackling modern slavery in the supply chain.

8. Key Activities undertaken during 2024 to 2025

The following activities were undertaken during the reporting period to further enhance our approach to mitigating modern slavery risk:

- **Policy and Procedure**
 - **The Anti-Slavery and Human Trafficking Policy** was published, confirming GBE-N's zero tolerance approach to modern slavery.
 - **The Code of Ethical Conduct** was launched in early 2025 and outlines GBE-N's commitment to conducting business in a way that respects the human rights of our colleagues and those we work with.
- **Training and Awareness**
 - All staff were required to complete an introductory training video on modern slavery, human trafficking and labour exploitation. Completion rates were tracked and monitored.
 - On Anti-Slavery Awareness Day, 18 October 2024, GBE-N's Head of Procurement published a blog entitled, "Tackling Modern Slavery in our Supply Chains".
 - Publication of the Anti-Slavery and Human Trafficking Policy and the Code of Conduct was communicated to all staff through various channels to raise awareness.
- **GBE-N's Annual Report 2024** – included a statement confirming GBE-N's commitment to Modern Slavery Act compliance.

9. Planned Activities for 2025 to 2026

- **Training**
 - Modern Slavery awareness is to be included in mandatory in person Induction Training which will be introduced for all new starters.

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- We will continue to mandate the annual completion of the Modern Slavery training packages for all staff and specialist training through the Government Commercial College for procurement and supply chain practitioners.
- **Awareness** – we will raise awareness and promote the Modern Slavery training requirement during the week of Anti-Slavery Awareness Day (18th October 2025).
- **Key Performance Indicators:** GBE-N will measure its effectiveness in preventing slavery and human trafficking in its business and supply chains, using the following performance indicators:
 - Percentage of managed procurements with a modern slavery risk assessment.
 - Number of contracts considered medium or high-risk and how many of these have completed the Modern Slavery Assessment Tool (MSAT).
 - Percentage of workers trained in modern slavery awareness.
- **Assurance:** GBE-N will conduct spot checking of completed RAMS and/or MSAT for assurance.

This statement was approved on 26 November 2025 by the GBE-N Board of Directors.

Signed on behalf of GBE-N by:

Simon Bowen

Chair of the GBE-N Board