



## MODERN SLAVERY STATEMENT

### Introduction from Chair and Director

Nominet is strongly opposed to all forms of slavery and human trafficking. We strive to act with integrity in all our business dealings and relationships to guard against slavery and human trafficking taking place within our organisation or our supply chains.

This statement provides some background to our organisation and our supply chains. It also sets out the policies we had in place during the financial year ended 31<sup>st</sup> March 2019 to prevent corruption or slavery and human trafficking from taking place in our organisation.

Two handwritten signatures in black ink, one on the left and one on the right, positioned below the introductory text.

### Our organisation

Nominet is a company limited by guarantee registered in England and Wales. We have two subsidiaries that support our own activities (Nominet Registrar Services Ltd and Nominet US Inc.). This statement covers Nominet UK, Nominet Registrar Services Ltd and Nominet US Inc.

Our activities are overseen by our Board of Directors who have ultimate responsibility for all that we do. Nominet's day-to-day management resides with the Executive leadership team which reports directly to the Board of Directors.

### Our policies and procedures

We operate a number of policies and procedures which reflect our commitment to acting properly in all of our business relationships and to implementing and enforcing effective systems and controls. They apply to all our employees and to anyone engaged on a temporary basis.

- Whistleblowing policy – which provides guidance on how to report suspected dangers or wrongdoing in the workplace.
- Anti-bribery policy - which aims to ensure we conduct all of our business in an honest and ethical manner by adopting a zero-tolerance approach to

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bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

- Health and Safety policy – a key aim of which is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
- Risk management and Business Continuity policies - which are designed to keep all our activities in line with applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).
- HR procedures – we check that all our staff have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package.
- Bullying & harassment policy – which is designed to help ensure that all of our staff and anyone that we fund is treated with both dignity and respect.

We will continue to review and develop our policies to ensure that they are effective and appropriate.

### **Our supply chain**

We use suppliers to support the operations of our organisation. The key areas in which we engage suppliers are:

- Communications service providers
- Telecommunications infrastructure and hardware suppliers
- Software support vendors
- Managed telecommunications service provider
- Finance and Investment Management
- Legal

### **Our supply chain due diligence**

With our increasing turnover we crossed the threshold for needing to produce a compliance statement under the provisions of the Modern Slavery Act 2015. This is therefore our first such statement. During the financial year ending 31<sup>st</sup> March 2019, we did not conduct any specific initiatives to ensure that slavery and human trafficking is not taking place within our operation or supply chains.

During the current financial year ending 31<sup>st</sup> March 2020, we will develop and implement a programme of activity including:

- Conducting a risk assessment to identify areas within our operations and supply chain that may be at risk of human trafficking or slavery.
- Revisiting our purchasing and procurement policies to include guidance on and references to modern slavery.
- Re-examine our human rights policy and code of conduct to ensure it remains appropriate.

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- Providing company employees and managers with direct responsibility for supply chain management training on how to minimise the risk of human trafficking and slavery.

## **Training**

Information and training is provided to all our employees, contractors and visitors on relevant matters. Here are some examples of the information and training we provide:

- All new joiners attend an induction session which includes information and training on our policies.
- All new joiners are required to undertake specific Business Continuity and GDPR training.
- Our managers are provided with a range of leadership training and are assisted by our HR team in HR related matters including in relation to recruitment, remuneration and employee wellbeing.

**This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Nominet's modern slavery and human trafficking statement for the financial year 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2019.**