

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, human trafficking and child labour 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 31st March 2020 to prevent corruption, slavery, human trafficking and child labour from taking place in our organisation.



Our organisation

Nominet UK is a company limited by guarantee registered in England and Wales. It is the parent company of a group consisting of seven subsidiaries that support our range of activities. In February 2020, the acquisition of US based cyber security company CyGlass Inc was completed. Due to the acquisition timings the activities of the newly acquired company do not form part of this statement.

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 supply chain

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

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

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 sets out our requirements for conducting all of our business in an honest and ethical manner by adopting a zero-tolerance approach to 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, Business Continuity, and operational 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.
- Environmental policy and reporting – designed to ensure sustainability and minimise our impact on the environment.

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

Risk assessment and management

During the reporting period we adopted the Social Responsibility Alliance's Slavery & Trafficking Risk Template (STRT). The STRT is a standardised open-source template that can be used to capture slavery and human trafficking-related risk and compliance data. We have used this template to build our slavery and human trafficking risk assessment and due diligence process. An initial risk assessment was made during the reporting period.

We will continue to develop and use our slavery and human-trafficking risk assessment process to help us identify areas within our operations and supply chain that may be at risk of human trafficking or slavery.

Due diligence processes

During the financial year ending 31st March 2020, we undertook a number of initiatives to map and better understand the risk profile for the business with regards to slavery and human trafficking. We strengthened our supplier management processes and initiated a programme of work to deploy an enhanced vendor management tool to further strengthen our approach to procurement.

During the reporting period we instructed an independent external auditor to assess the probity of our financial accounts, governance controls and processes. We were also audited regularly throughout the year by independent external auditors to ensure our compliance with our ISO standards and no concerns were raised relating to the prevention of slavery, trafficking and child labour in our business or supply chain.

During the current financial year ending 31st March 2021, we will continue to develop and implement our programme of due diligence activity including:

- Publishing an updated Procurement Policy that includes guidance on and references to modern slavery
- Full deployment of a vendor management tool that will enable us to centrally track due diligence on, and declarations from, our suppliers on matters including anti-slavery, trafficking, and child labour measures
- Providing company employees and managers with direct responsibility for supply chain management training on how to minimise the risk of human trafficking and slavery

Key Performance Indicators (KPIs)

Nominet's KPIs have been developed to enable the business to measure its overall performance as a business. Care is taken to ensure that the KPIs set do not encourage malpractice of any type.

Following the initial STRT risk assessment, some areas for improvement were highlighted. KPIs are being developed to measure progress against reducing these risks, i.e. KPIs to measure how successfully we have formalised our supply chain due diligence and contractual controls.

Training

Information and training is provided to all our employees, contractors, and visitors on relevant matters. The following are examples of the information and training provided:

- All new joiners attend an induction session which includes information and training on our policies
- All new joiners are required to undertake specific Information Security, Business Continuity and GDPR training
- Additional anti-bribery training is provided to staff on a targeted basis
- 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

We are developing a training module that will support our people in the identification of risks relating to slavery and human trafficking.

Other activities

We are proud of our longstanding relationship with the Internet Watch Foundation (IWF) and during the reporting period we have worked closely with them to tackle the presence of child sexual abuse content hosted on .UK domain names. We also partner with law enforcement agencies to suspend domains used for criminal activity. This work together with anti-phishing initiatives such as Domain Watch help to tackle pernicious activity and remove funding sources supporting organised crime. Collectively these responses demonstrate our commitment to tackling online criminal activity including human trafficking, that may be operating in the .UK namespace.

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 1st April 2019 to 31st March 2020.