

**Slavery and Human Trafficking  
s.54(2) Modern Slavery Act  
Second Statement  
(Financial year ending 31 December 2017)  
NSSLGlobal Limited**

**Introduction**

This statement sets out the actions taken by NSSLGlobal Limited (NSSLGlobal) to understand and mitigate potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our own business or in the business of the suppliers we use.

We make this statement in compliance with section 54 of the Modern Slavery Act 2015. A copy of our statement can be found at our website: [www.nsslglobal.com/msastatement](http://www.nsslglobal.com/msastatement).

**Our Business**

We are an independent provider of commercial satellite communications services to a broad range of customers on a global basis. We have our headquarters in Redhill, UK and also have subsidiary / branch offices in USA, South Africa, Singapore, Poland, Norway, Germany and Denmark. In providing our services we typically supply a mixture of airtime services and associated equipment or hardware for installation at our customer's premises, or on their vessel or vehicle. We support our clients with their technical, engineering and installation / activation requirements via our 24/7 network operating centres and also through our on the ground engineers (employed or contracted / third party).

We use components from a variety of sources in our workshops when customising or making equipment ready for use.

This statement applies to NSSLGlobal and its subsidiaries.

**Our position**

We recognise our corporate commitment to all stakeholders to act ethically and with integrity in our business dealings and relationships. This includes ensuring that we and our suppliers value human life. We are committed to playing our part in preventing slavery and human trafficking in our business activities and ensuring that our supply chain is free from such activities.

**Codes and Policies**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in our business.

Our **Supplier Ethics Code** includes a section on modern slavery and our expectations from suppliers. The code contains commitments which pass down the supply chain, for that our immediate supplier is, in turn responsible for ensuring compliance from his supplier and so on. The Code states the minimum ethical and labour and working practices we expect of our supply chain. This Code will be implemented into our supply chain process (including training of our logistics and procurement team) and circulated to suppliers during the first half of 2018. Internally during 2017, we have drafted a **Human Rights and Modern Slavery Policy** which provides specific guidance for our staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour in our supply chain and how to respond to and escalate any concerns. We will be adopting this into our organisation in 2018, to include training for our procurement and logistics teams.

We also have a **Business Integrity, Anti-Corruption and Bribery Policy** in place for our business activities and have undertaken a company-wide roll-out of it during 2017 by having multi-disciplinary interactive training and refresher sessions.

### **Supply Chain**

We procure a wide range of goods and services via a diverse and varied supply chain to meet our operational and customer needs. For example, a number of our key suppliers are significant companies, like Cobham PLC, Inmarsat, RS Components. Others are small service companies and individual sole traders.

As part of the tender process and supplier selection, from Q2 2018 our suppliers will be asked to sign up to our Supplier Ethics Code.

### **Due Diligence and Risk Assessment**

We have revisited our supplier questionnaire and we are using this document to help us with our assessment of risk of modern slavery or human trafficking impacting our supply chain. From Q2, 2018, the questionnaire will include a section on modern slavery with questions which target slavery and human trafficking risk and mitigation.

We started a review of our key supplier's activities in 2017. This will continue in 2018 and we will review our key suppliers activities and countries where they operate in line with the Global Slavery Index and Child Labour Index to assess the risk of slavery or human trafficking. Our response will be tailored to our findings.

We continue to develop processes internally with our procurement team for the identification, assessment and monitoring of potential risk areas in our supply chains. This is part of a comprehensive risk management programme underway across the organisation.

Our Human Rights and Modern Slavery Policy has provisions to protect whistle blowers – we actively encourage our staff to raise concerns on unethical business practices.

Our Supplier Ethics Code will allow us to conduct regular reviews to ensure suppliers are assessed and their supplier questionnaires are up to date. Reviews may include on-site assessments or supplier audits dependent on the nature of the goods or services being provided and on the industry sector in which the supplier operates. The frequency of these audits and/or on-site assessments will be dependent on the risk profile of the contract and/or supplier.

As part of our contracting process, in 2017 we developed a contract clause toolkit for modern slavery and human trafficking. This will include standard clauses containing prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adult or children. The contract clause toolkit will also provide for audit and review and obliges our suppliers to in turn, manage their own modern slavery and human trafficking risks in their supply chain. The contract toolkit will be integrated into our contracting activities during 2018.

Potential new suppliers who are rated as being higher risk will be required to provide further evidence of their ethical operations and ability to comply with our Supplier Ethics Code. We will put in place monitoring and reviews for 'higher' risk suppliers – this monitoring may be done by us or we may engage a third party to do so on our behalf.

### **Training**

We have made available, through Company Presentation, initial information on the Modern Slavery Act 2015 and also the implementation of our Supplier Ethics Code and Human Rights and Modern Slavery Policy. We propose to hold refresher sessions annually in the organisation for our staff who are involved in procurement.

From 2018 onwards, we will include a section on Business Integrity, Ant-Bribery and Modern Slavery Risks as part of the new employee induction programme.

### **Responsibility**

In Q1 2018 we will set up a Business Ethics Steering Group comprising the following permanent members:

- Group Commercial Counsel
- Finance and HR Director
- Head of Operations - Procurement / Supply Chain

Additional members will be discussed at the first meeting to ensure the right mix of representation across the business.

The Steering Group will be focused on developing and implementing programmes to address modern slavery risks and unethical activities within our operations and supply chain. During 2018, the Steering Group will assess ongoing potential exposure to bribery, corruption and modern slavery risks. This assessment is linked to the periodical review of external sources, including the Corruption Perceptions Index, Global Slavery Index and the Child Labour Index and the responses from suppliers in their completed questionnaires.

### **Board Approval**

The statement has been approved by the Group CEO of NSSLGlobal on behalf of the Board of Directors.

Sally-Anne Ray  
Group CEO  
31 December 2017