

## **Slavery and Human Trafficking**

### **s.54(2) Modern Slavery Act**

#### **Fourth Statement**

**(Financial year ending 31 December 2019)**

#### **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 active subsidiary / branch offices in USA, Singapore, Israel, 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. In addition, through our NSSLGlobal Technologies business, based in Norway, we engage in the development and manufacture of satellite technologies including hubs and modems. For this activity, we engage with third party manufacturers.

This statement applies to NSSLGlobal Limited 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 and contract manufacturers. The code contains commitments which pass down the supply chain, for that our immediate supplier or contract manufacturer 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. We will continue to seek to implement this Code into our supply chain process. Refresher training of our logistics and procurement teams is being planned for the first half of 2019 as part of our commitment to instilling and encouraging business integrity best practice across our organisation.

Our **Human Rights and Modern Slavery Policy** provides specific guidance for our staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour in our supply chain / manufacturing facilities and how to respond to and escalate any concerns. This is adopted into our organisation and is and will augment with refresher and induction training, as above, during 2019.

This policy is supported by our **Business Integrity, Anti-Corruption and Bribery Policy**

#### **Supply Chain including Contract Manufacturers**

We procure a wide range of goods and services via a diverse and varied supply chain to meet our operational and customer needs. As mentioned above we are also now involved in the development and manufacture of certain satellite hub and modem technology for supply to our customers. For example, a number of our key suppliers are significant companies, like Cobham PLC, Inmarsat, RS Components. Others are contract manufacturers, small service companies and individual sole traders.

As part of the tender process and supplier selection, our suppliers and contract manufacturers are asked to sign up to our Supplier Ethics Code along with completing the supplier questionnaire (see below).

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

Our supplier questionnaire helps us with our assessment of risk of modern slavery or human trafficking impacting our supply chain. 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 activities in 2018 and this continued into 2019. This is an ongoing process and so will continue in 2020. We 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 allows 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, we flow-down compliance clauses as regards MSA and business integrity generally into our supplier arrangements as appropriate. This 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, as well as audit and review

Potential new suppliers who are rated as being higher risk are required to provide further evidence of their ethical operations and ability to comply with our Supplier Ethics Code. In 2020, we will review what additional monitoring and reviews for 'higher' risk key suppliers is appropriate, which may be done by us or we may engage a third party to do so on our behalf.

### **Training**

We make 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 also hold refresher sessions annually in the organisation for our staff who are involved in procurement.

Our new employee induction programme includes a section on Business Integrity, Ant-Bribery and Modern Slavery Risks as part of the new employee induction programme.

### **Responsibility**

Our Business Ethics Steering Group, which is part of our Management Team activity in the UK

Is focused on ensuring MSA and other business integrity topics are considered at an operational leadership level.

The Steering Group activity included assessing 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.



Sallyanne Ray, Group CEO, 31 December 2019