

Nuclear Transport Solutions Modern Slavery Act Statement

This statement covers the period 1 April 2026 to 31 March 2027.



Introduction

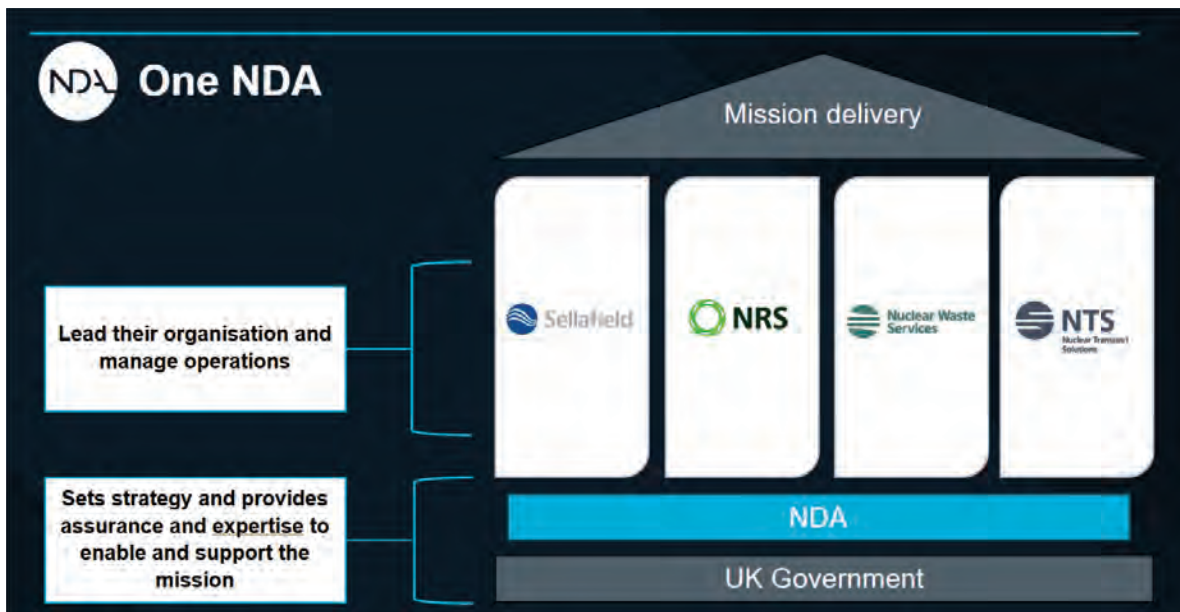
Section 54 of the UK Modern Slavery Act (2015) requires domestic and international commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a slavery and human trafficking statement disclosing what steps are being taken to ensure modern slavery is not taking place in any of its business or supply chains.

Nuclear Transport Solutions consisting of International Nuclear Services Limited, Direct Rail Services Limited, and Pacific Nuclear Transport Limited is committed to ensuring that there is no modern slavery or human trafficking in any part of its business or supply chain.

This statement sets out its position on modern slavery, how it addresses its risk, including that within both our UK-based and international supply chains, and its objectives for the next financial year.

Who are we?

Nuclear Transport Solutions (NTS) comprises Direct Rail Services Limited (DRS) and International Nuclear Services Limited (INS), which are wholly owned subsidiaries of the Nuclear Decommissioning Authority (NDA), a public body responsible for ensuring the safe and efficient clean-up of the UK's nuclear legacy. Pacific Nuclear Transport Limited (PNTL) operates within the NDA group; it is not wholly owned by the NDA and is held through a shared ownership structure. The image below provides an overview of how the NDA and its subsidiaries are connected:



NTS are specialists in the operational, commercial, engineering, legal and regulatory expertise that underpin nuclear transport and logistics operations, with decades of experience of providing safe, secure and reliable transport solutions.

We also work for customers outside the nuclear sector. For example, we operate a number of intermodal rail freight services in consumer goods and general freight markets. Undertaking this work ensures our capabilities and assets are maintained and enhanced and generates additional revenue to support the NDA's mission.

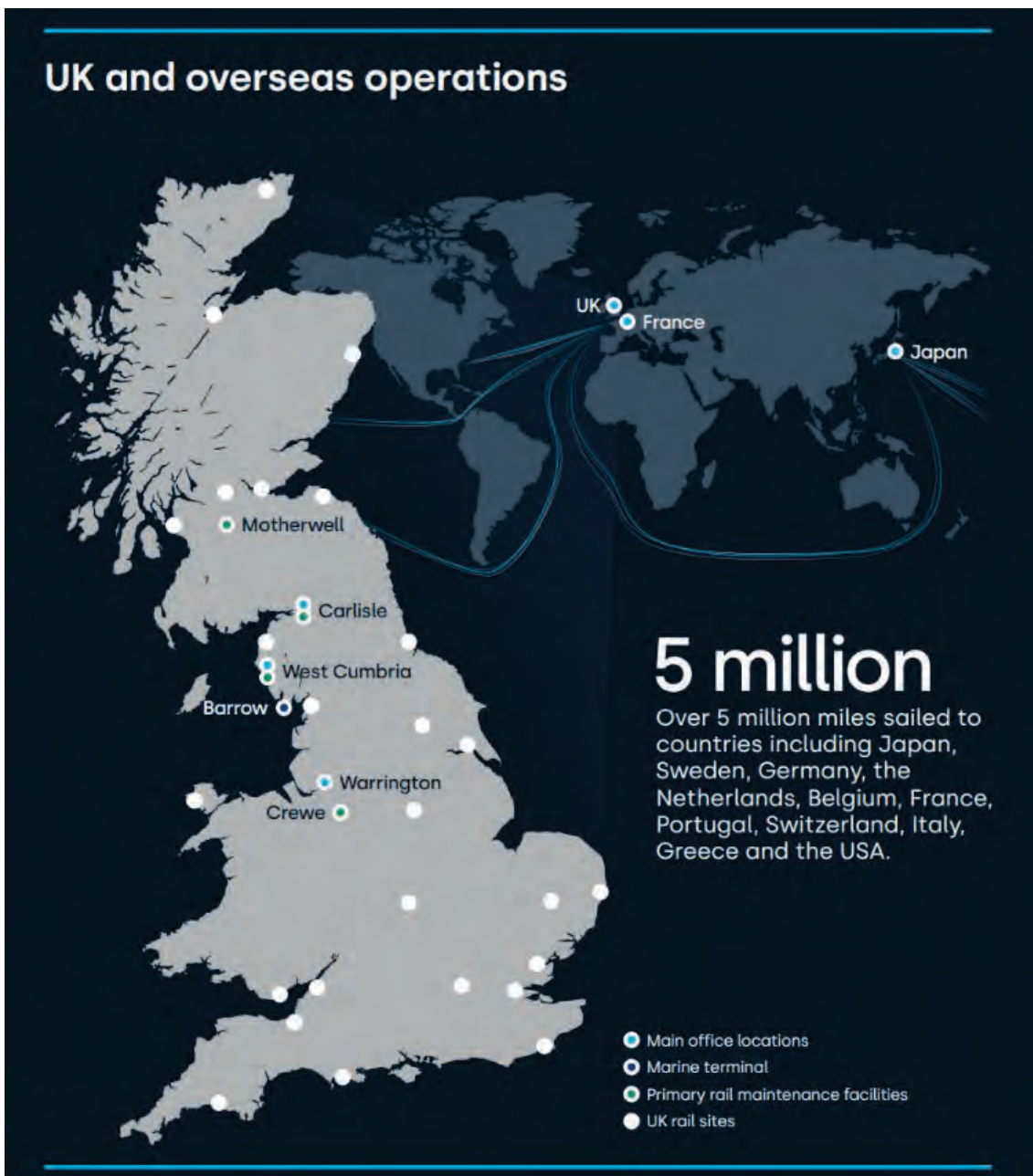
Operating in the UK and overseas, we employ circa 700 employees across three business lines: Rail, Shipping and Solutions.

Rail - Our rail business line continues to grow our reputation as a leading UK rail operator, with our people and assets providing specialist nuclear rail solutions, as well as intermodal and rail freight services for a range of non-nuclear customers under the DRS brand.

Shipping - Our shipping business line is responsible for maintaining and enhancing our global reputation for safe and secure nuclear shipments. We operate PNTL, the world's most experienced shipper of nuclear materials, and continue to expand into new markets.

Solutions - Our solutions business line is the gateway to NTS's transport and logistics capabilities. From consultancy and complex assessments to package design and licensing, we support nuclear transport and logistics projects from beginning to end and anywhere in between.

For more information about NTS please visit: www.nucleartransportsolutions.com.



Our suppliers

We have a vast global supply chain, spending £108.5 million with 539 suppliers during Financial Year 2025/2026. This number reflects a range of suppliers, from one-off small value orders to longer existing contracts and collaborative frameworks.

Our largest expenditure is in the transport and logistics sector, predominantly through leasing our rolling stock, the management and operation of our fleet of ships and logistics.

We require our suppliers to establish and uphold policies and procedures that ensure adherence to relevant human rights and employment laws. According to their contractual obligations, all Tier 1 suppliers must comply with anti-slavery and human trafficking laws, statutes, regulations, and codes currently in effect, including the Modern Slavery Act 2015.

Policies in relation to modern slavery, forced labour and child labour

Our policies are easily accessible on the company intranet, and our current Modern Slavery Statement, as well as previous statements, are published on our company website for full transparency.

Addressing our risk

Our anti-slavery and trafficking activities are tailored to the identified risk level. Using an internal assessment tool, we evaluate contracts over £25k by assigning risk scores, which place suppliers into four categories: No risk Identified, low, medium, or high risk.

What have we done so far to address Modern Slavery and Human Trafficking?

In 2023/24 or prior:

- Strengthened governance by appointing a Modern Slavery Champion.
- Maintained transparency through an annual Modern Slavery and Human Trafficking Statement.
- Set clear expectations for employees and suppliers through a Modern Slavery Code of Conduct and updated procurement documentation.
- Embedded a risk-based approach by assessing higher-value suppliers and focusing enhanced due diligence on areas of higher risk (including the shipping supply chain).

In 2024/25:

- Reviewed and strengthened our approach to identifying, assessing and controlling modern slavery risks.
- Improved cross-functional ownership and governance through wider engagement and expanded champion coverage.
- Continued to embed modern slavery checks within procurement and supplier due diligence for higher-value activity.
- Increased internal awareness through ongoing communications and guidance on ethical sourcing.
- Continued targeted engagement with key suppliers to support transparency and continuous

improvement in higher-risk areas.

In 2025/26:

- Established Bi-Annual Champion Calls, a twice-yearly call with Modern Slavery Champions with a standing agenda.
- Following introduction of mandatory training to the commercial directorate we have now rolled out mandatory Modern Slavery training across the wider business. Training will be completed on an annual basis by all staff.
- In August 2025, representatives from Hope for Justice, a charity organisation committed to fighting modern slavery, gave a presentation to the business. They shared their expertise by providing firsthand insights and real-world examples to help illustrate the issue.
- We have conducted a review of our Modern Slavery Risk Bow Tie with input from our newly appointed Champions.
- We have conducted a review of our internal policy to ensure the policy remains current, compliant, and reflective of evolving risks and best practices.

Training

Staff have access, through our training portal, to Modern Slavery Courses.

Individuals within our Commercial Directorate are required to complete an annual online Modern Slavery training course. As of 2025, this mandatory training has been rolled out across the wider business. All staff will now complete the course annually, which covers key topics including an introduction to Modern Slavery, the Modern Slavery spectrum, and how to identify and responsibly report potential instances.

An Anti-Modern Slavery and Human Trafficking Code of Conduct has been developed for Nuclear Transport Solutions, to increase staff awareness, and is available on our website.

NTS recognises and respects our employees' right to join a Trade Union.

Objectives for 2026/27

NTS is committed to progressing the following objectives over the next year:

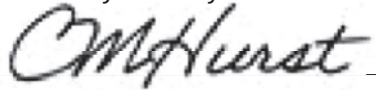
- **Maintain biannual MS Champion calls** to review progress, share updates, and gather insight from across the business.
- **Undertake a review of the Code of Conduct** to confirm alignment with current policies, regulatory requirements, and best practice.
- **Strengthen alignment with the wider oneNDA group** to inspire shared learning, improve collaboration, and encourage consistency across Modern Slavery activities.
- **Refine our statement** so that it aligns with the oneNDA collaboration, incorporating Home Office guidance where appropriate.
- **Publish awareness posters** across the intranet and within our offices and depots to reinforce employee awareness of modern slavery indicators and the importance of reporting concerns through the appropriate channels.
- **Develop and publish a Modern Slavery Policy and Procedure** that sets out clear roles, escalation routes and reporting steps, including what employees and contractors must do if they suspect modern slavery.
- **Further educate and highlight Modern Slavery** to the supply chain including webinars.

- **The Procurement Team will participate in annual refresher sessions** to facilitate the sharing of LFE, knowledge, and other relevant information.
- **Gather insights and feedback** from a broad range of government departments regarding their approaches and experiences with modern slavery.

Following a review of our supplier expenditures during the financial year that concluded on March 31, 2026, this statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes NTS's slavery and human trafficking statement for the year 2026/27.

It was approved in July 2026 by the NTS Board of Directors who review the statement annually.

Signature: _____



Ciara Middlehurst

Chief Executive Officer for Nuclear Transport Solutions

Date: 4 August 2026