



Modern Slavery Act Statement

2019/20

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Revision History

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1. INTRODUCTION

This statement, made on behalf of and approved by the Board of Nemo Link Limited, is published in accordance with the requirements of section 54 of the Modern Slavery Act 2015. It sets out the approach to assess and mitigate the risk of slavery and human trafficking in our business and supply chain during the financial year ending 31 December 2019.

This is the first year that Nemo Link Limited has met the criteria obligating it to publish an annual statement.

2. OUR BUSINESS AND SUPPLY CHAIN

2.1. ABOUT US

Nemo Link consists of subsea and underground cables connected to a converter station and an electricity substation in each country, which allows electricity to flow in either direction between the two countries. The location of the converter station and electricity substation in the UK is an 8 hectare site, formerly occupied by the Richborough Power Station, which now forms part of the Richborough Energy Park. A similar converter station and substation is located in the industrial zone of Herdersbrug in Bruges, Belgium.

2.2. ORGANISATIONAL STRUCTURE

The Nemo Link interconnector is owned and operated by Nemo Link Limited, an incorporated joint venture between National Grid Interconnector Holdings Limited, a subsidiary of National Grid Plc in Great Britain, and the Belgian Elia group. The subsea HVDC interconnector electrically connects Belgium and Great Britain providing both countries with improved grid reliability and access to sustainable electricity generation.

We are a small organisation of circa 30 team members, based in the UK and Belgium. Approximately half of our team members fulfil operational roles at the converter stations, while the other half are office-based.

2.3. SUPPLY CHAIN

Our supply chain is in general limited to companies primarily based within the UK and the European Union providing professional and operational services to us; for example, engineering support at our converter stations. Our general assessment is that our business partners, suppliers and sub-contractors

operate in lower risk areas, however we do recognise that some of our directly-contracted suppliers are part of group companies with a global reach. We therefore continue to be vigilant to the potential for modern slavery in our supply chain.

2.4. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Nemo Link is committed to its obligations under the Modern Slavery Act 2015, in addition to its wider commitments to the human and working rights of all our employees and those employed within our supply chain.

These commitments are incorporated within our internal Nemo Link Code of Conduct. The Nemo Link Code of Conduct applies to all our team members and contractors and sets out our ethical business conduct values and the way we expect our team members to behave. As a joint venture, our employees are also expected to comply with parent company policies in relation to slavery and human trafficking.

Nemo Link wrote to its main converter site maintenance provider during the course of the 2019 financial year to request confirmation of its compliance with the Nemo Link Code of Conduct and evidence of its Modern Slavery policy.

Nemo Link has also recently conducted a full review of its standard form contracts in order to incorporate Modern Slavery clauses and include audit rights to review supplier compliance.

2.5. DUE DILIGENCE PROCESSES

As an operational interconnector, Nemo Link's procurement activities are limited and in general relate to professional services where we consider the risk is in general low. However, Nemo Link will continue to consider whether additional actions to those highlighted above are warranted when engaging new suppliers.

2.6. RISK ASSESSMENT AND MANAGEMENT

During its construction and operational phases, Nemo Link has engaged directly with its key suppliers to understand what controls they have in place to manage and mitigate risk in relation to modern slavery. A number of these suppliers continue to support Nemo Link in its operation phase. Nemo Link considers that its supply chain is low risk, but will continue to review this approach including as part of its regular risk register reviews.

2.7. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

Nemo Link management set annual company targets which incorporate staff safety and active risk management. Nemo Link will continue to monitor the appropriateness of these targets including considering whether to incorporate a specific target relating to modern slavery.

2.8. TRAINING ON MODERN SLAVERY AND TRAFFICKING

Nemo Link seconded employees are required to undertake training in compliance with their parent company policies. Nemo Link may consider reviewing its training requirements for employees and contractors over the next 12 months including in relation to modern slavery.

This statement was approved by the Board of Directors of Nemo Link Limited on 24 March 2020.



Nick Sides
Director, Nemo Link Limited
June 2020