

National Wealth Fund – Modern Slavery Act Statement

Introduction from John Flint, Chief Executive Officer

I am pleased to support the National Wealth Fund's second statement made pursuant to section 54 of the Modern Slavery Act 2015 (the **Act**) which sets out the steps that the National Wealth Fund (**NWF**) has taken to identify, mitigate and prevent modern slavery in its own supply chain for the financial year ending 31 March 2025. The NWF is committed to improving our practices to combat slavery and human trafficking in our organisation and supply chain.

At NWF we have zero tolerance to slavery and human trafficking. We are committed to acting ethically and with integrity in all our business relationships and to ensuring our practices help combat slavery and human trafficking in our organisation and supply chain.

As well as this, we have taken a number of steps to analyse our supplier base (which are predominantly in the UK or other low risk countries) and raise awareness among our procurement function on what to do if modern slavery is suspected. We also have capabilities within our Risk and Impact functions to assess and monitor modern slavery risk in our investment activities.

There is more work to be done, and this initial statement demonstrates NWF's commitment to further enhance our approach to continue excluding modern slavery across the business over the next 12 months.

NWF's structure

The National Wealth Fund deploys capital at scale in capital intensive projects, businesses or assets that support government's growth and clean energy missions, and its sole shareholder is HM Treasury. NWF has over 250 employees and operates solely in the United Kingdom.

NWF's business

NWF's business is organised into the following business units:

- Banking and Investments
- Financial Operations
- Impact
- Legal & Governance
- Policy and Strategy
- Risk and Compliance
- Human Resources
- Internal Audit Services
- Local Authority
- Portfolio Management

- Procurement & Operations

Our supply chains

NWF's goods and services contracts are categorised based on the Cabinet Office contract tiering tool, gold tier contracts represent our more complex and / or high value contracts, through a descending scale to silver and bronze tier contracts. The table shows a breakdown of NWF's contracts for 2025/2026:

Number of contracts	Contract Tier	Suppliers registered in the UK	Non-UK Suppliers location
8	Gold	6	2 (Denmark and USA)
92	Silver	90	2 (USA)
98	Bronze	97	1 (Denmark)

NWF operates a centralised procurement function that aligns with the Cabinet Office's Procurement Policy Note **PPN 02/23, Tackling Modern Slavery in Government Supply Chains** (Policy Note), and its accompanying guidance. This Policy Note sets out expectations for public sector organisations to identify and manage modern slavery risks in both new procurement activity and existing contracts.

Building on the foundations laid under previous guidance (PPN 05/19), we have strengthened our approach in line with the evolving legislative landscape, including the **Procurement Act 2023** and the **Procurement Regulations 2024**. Our procurement practices now reflect a more proactive and risk-based methodology, with a focus on continuous improvement and supplier accountability.

Key enhancements implemented this year include:

- **Risk-based supplier segmentation:** We have conducted a detailed analysis of our supplier base to identify contracts not let via frameworks and prioritised these for modern slavery risk assessment.
- **Use of the Home Office Modern Slavery Assessment Tool (MSAT):** We have begun embedding MSAT completion as a requirement for higher-risk suppliers, with contract management plans tailored to those registering medium or high risk.

- **Updated procurement documentation:** Our standard procurement templates now include explicit modern slavery clauses, ensuring suppliers understand and commit to our expectations from the outset.
- **Training and awareness:** All procurement staff have completed the Government Commercial Function/CIPS ethics e-learning and have received targeted training on the implications of the Procurement Act 2023 and the new exclusion criteria.
- **Modern Slavery Champion:** A dedicated member of the procurement team continues to act as NWF's Modern Slavery Champion, supporting colleagues and driving best practice.
- **Governance and accountability:** Modern slavery compliance is embedded in procurement processes and monitored through internal governance mechanisms, with escalation routes available via existing processes.

Our Policies on Slavery and Human Trafficking

Our compliance with the Policy Note reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have developed a formal Procurement Modern Slavery Policy to underpin this commitment which is reviewed annually.

We encourage all our employees who identify potential modern slavery issues within our business or supply chain to report their concerns in accordance with our escalation processes.

The NWF has wider policies underpinning its commitment of complying with legal and regulatory frameworks, including policies to define its low-risk appetite for Modern Slavery exposure and mechanisms to detect, assess and mitigate financial crimes relating to Slavery and Human Trafficking through its investments. Risk Appetite and Assessments are reviewed annually by the NWF Board and directive policies are to be read and acknowledged by NWF personnel. Our most recent Financial Crime Risk Assessment included Modern Slavery as a discrete category of financial crime.

Aligned with our ESG framework and guiding principles, we are committed to managing material ESG risks, including those related to modern slavery, within our investment supply chains. While we acknowledge the evolving nature of our due diligence processes and system, we remain committed to maintaining their alignment with our framework, relevant regulations, and prevailing market standards.

Due Diligence Processes for Slavery and Human Trafficking

Supply chain

As part of our initiative to identify, assess, monitor and mitigate potential risk areas in our supply chains, we have embedded modern slavery considerations throughout the commercial lifecycle:

- **Pre-procurement & Specification:** We assess the potential risk of modern slavery in each procurement and determine whether additional mitigations are required in the specification.
- **Selection Stage:** We apply the mandatory and discretionary exclusion grounds in the Standard Selection Questionnaire (SSQ), in line with **PPN 03/23**.
- **Award Stage:** We include proportionate tender questions on modern slavery where relevant to the contract scope.
- **Contract Conditions:** We include modern slavery-specific terms and conditions in supplier contracts.
- **Contract Management:** We maintain ongoing collaboration with suppliers to monitor risks, implement action plans, and ensure MSAT completion where appropriate.

Investments

NWF conducts due diligence and leverages industry expertise in assessing its investment exposure to financial crimes relating to Modern Slavery and utilises industry screening to detect adverse coverage relating to Modern Slavery connected to its investments and suppliers.

Employees are encouraged to report any concerns around potential modern slavery issues in accordance with existing reporting and governance processes.

Supplier adherence to our values

We have zero tolerance for slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

We also have a dedicated Risk & Compliance department, and further input into NWF's compliance with its modern slavery obligation is provided on an ongoing basis from the following departments:

- Human Resources
- Impact
- Legal & Governance

- Procurement and Operations

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, we acknowledge that we still have further progress to make.

We are aware of the updated Home Office guidance published on the 27th March 2025 for companies producing Modern Slavery statements and will be using this guidance to inform our next steps in the next reporting period.

We continue to review and evaluate the measures and processes we have implemented so far to ensure their effectiveness and we intend to take additional steps over the coming year to combat slavery and human trafficking, which shall be detailed in our subsequent modern slavery statements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved by the board of directors of NWF on 25 July 2025.

John Flint, Chief Executive Officer,



National Wealth Fund