



Modern Slavery Act statement

For the year 2018/19

Nest Corporation is making this statement in accordance with section 54 of the Modern Slavery Act 2015 (MSA). It covers the steps taken for the financial year 1 April 2018 to 31 March 2019.

Nest Corporation has zero tolerance for any activity which constitutes modern slavery or human trafficking under the MSA.

This statement sets out the approach taken by Nest Corporation to understand the potential modern slavery risks related to its business and its supply chains, and the actions undertaken to ensure there is no occurrence of slavery or human trafficking.

Organisational structure

Nest Corporation operates in the pensions market as an auto enrolment pension scheme trustee. It has two roles, one as Trustee of the Nest pension scheme and the other as a public corporation that is accountable to Parliament through the Department for Work and Pensions.

Nest Corporation comprises a Chair and up to 14 Trustee Members and employs over 200 staff. Together, the Trustee Members form the Trustee of the Nest pension scheme. Like other

work-based pension schemes, Nest is regulated by the Pensions Regulator. To find out more about us please visit nestpensions.org.uk

As an organisation, the Nest code of conduct sets out our organisational standards and the ethical principles that all our employees, secondees and interims are required to uphold. Our corporate responsibility statement reflects our commitment to acting ethically and with integrity in all our business relationships. Further information can be found at nestpensions.org.uk

We work with a range of suppliers such as investment fund managers, fund administrators, and suppliers of administration and professional services.

Risk assessment

This year (2018/19), we carried out a full review of our methodology for identifying the impact of the MSA on our activities and our supply chain, and our potential exposure to modern slavery and human trafficking activity. We reviewed and modified the questionnaire that is circulated within the business and concluded that there was no substantial change in our risk exposure. As a result, we followed a similar approach to last year. However, we built on this process by incorporating some additional steps described below. We concluded that most of the suppliers that Nest Corporation currently engage with are low risk in terms of modern slavery and human trafficking activities.

Due diligence on our supplier chain

We have reviewed and updated the procurement page on our website to ensure it is up to date. We have also introduced a new MSA provision into our supplier contracts and condition of purchase, requiring suppliers to flow down the obligations we require of them regarding MSA compliance, to their sub-contractors. In addition, we identified a set of key suppliers and wrote to them requesting, where applicable, a copy of their MSA statement. We also asked them to notify Nest Corporation of any instances of modern slavery that have occurred within their organisation in the last 12 months.

Finally, as a public corporation, we undertake due diligence when considering taking on new suppliers in accordance with the Public Contracts Regulations 2015.

Nest Corporation, when acting as trustee of the Nest pension scheme, has a voting and engagement policy. This guides our actions as a responsible asset owner and sets out our views on supporting and shaping good corporate behaviour.

Within the policy we promote strong principles on corporate sustainability which includes encouraging companies to manage and report on risks and issues within their workforce. This includes modern slavery.

We are signatories to the Workforce Disclosure Initiative (WDI) which encourages UK companies to report information on a range of workforce related issues including modern slavery and forced labour within its operations and supply chains.

Our emerging market fund excludes companies that have been involved in human rights abuses, forced and child labour.

Nest Corporation has a robust HR process and conducts background screening and right to work checks on all of our payrolled staff.

For contractors and consultants, we engage with reputable recruitment agencies and they conduct the appropriate checks on our behalf.

All our staff are paid at least the minimum wage. Salaries are reviewed annually for Nest Corporation's payrolled staff.

Raising awareness

We have undertaken activities to raise awareness of modern slavery with Nest Corporation employees. This includes:

- posting articles on our intranet to provide updates on modern slavery and remind everyone about Nest Corporation's expectations in relation to modern slavery and human trafficking
- updating our whistleblowing policy to provide a mechanism for reporting any concerns relating to modern slavery safely and anonymously via a 24/7 hotline service. This policy is published on our intranet.

Training

To ensure a general understanding of the risks of modern slavery and human trafficking in our supply chains and our business and how to spot signs, we offered training to the Procurement, HR, Legal, Facilities and Compliance teams.

Further steps

Going forward, we intend to focus on increasing our activities to raise awareness of modern slavery and human trafficking using our intranet and external website.

This statement has been approved by Nest Corporation and constitutes the Modern Slavery Act statement for the financial year 2018/19 covering the period from 1 April 2018 to 31 March 2019.

Signed on behalf of Nest Corporation

Chief Executive Officer:

Helen Dean

Date:

28 June 2019