

## **Diamond Light Source Ltd**

### **Anti-Slavery and Human Trafficking Statement (2025)**

#### **Introduction**

This statement sets out Diamond Light Source Ltd's ("Diamond") actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Diamond's financial year end is 31 March each year and this statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

Diamond has a zero-tolerance approach to slavery and human trafficking, and we are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

#### **Diamond's structure and business**

Diamond is the UK's national synchrotron facility and by accelerating electrons to near light speed, it generates brilliant beams of light that are used by thousands of researchers to conduct research in a wide range of disciplines.

Diamond is a private limited company funded as a joint venture between the UK Government via the Science and Technology Facilities Council (as part of UK Research and Innovation) and the Wellcome Trust.

Diamond operates in the United Kingdom from Diamond House, Harwell Science and Innovation Campus, Didcot, Oxfordshire and employs over 800 scientists, engineers, technicians, and support staff.

#### **Diamond's governance and oversight**

Diamond's Board of Directors has overall responsibility for its anti-slavery and human trafficking initiatives. The Board of Directors is supported by the Human Resources, Legal and Procurement departments.

#### **Diamond's employees**

Diamond's Human Resources department ensures that:

- All employees have the legal right to work in the UK.
- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave their employment.
- Diamond does not withhold any employee's identity documents (e.g. passport) during their employment.
- All employees are paid at least the minimum wage.

- Diamond complies with all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies and sickness, parental leave and minimum rest break periods.
- All employees may join a trade union of their choice and are supported in doing so. Diamond has a collective agreement in place with Prospect.
- All employees have access to several different routes to raise and report concerns as detailed in Diamond's Whistleblowing Policy.

### **Diamond's supply chain**

Diamond's supply chains comprise various third-party suppliers. The range of products and services procured from our suppliers include, but are not limited to, scientific equipment, IT hardware and software, cleaning and professional services. Suppliers are geographically diverse with the majority of suppliers being located in the UK and Europe.

Diamond's supply chains involve/include Diamond employees, seconded workers, volunteers, interns, agents, contractors (specifically including suppliers and casual and agency staff), external consultants, third-party representatives and business partners.

To help identify and monitor the risk of slavery and human trafficking in our supply chain Diamond's Procurement department ensures that:

- compliance with the Modern Slavery Act 2015 is included as a term of our supply contracts;
- regular assurances are sought that suppliers are taking steps to ensure there is no modern slavery, human trafficking and child labour in any part of their business and supply chains; and
- appropriate and proportionate due diligence, and enhanced due diligence where necessary, is undertaken to understand a supplier's position on modern slavery, human trafficking and child labour and whether they have sufficient controls in place.

Diamond considers the main area of risk in its supply chain is the procurement of computing hardware. To reduce this risk, Diamond is a full member of the London Universities Procurement Consortium, which provides Diamond with the benefits from the affiliation with Electronics Watch. Electronics Watch is an independent monitoring organisation that helps public sector buyers work together to protect human labour rights and improve working conditions for workers in their global electronics supply chains.

### **Diamond's policies**

All Diamond policies are governed by a master policies framework which describes the development, approval, review and management of policies.

Our [Anti-Slavery & Human Trafficking - - Diamond Light Source](#) Policy 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. Any Diamond employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct, Diamond may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Our Anti-Slavery & Human Trafficking Policy is supported by our Whistleblowing Policy and Supplier Code of Conduct.

### **Training and awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide mandatory annual training to all staff.

### **Steps taken in FY 2024/2025**

As part of our initiative and actions from FY 2024/2025 to identify and mitigate risk, we undertook the following steps:

- Reviewed the clauses relating to Modern Slavery in our procurement terms and conditions and updated where required as a result of changes in law and/or good practice.
- Advertised our Anti-Slavery & Human Trafficking Policy and Supplier Code of Conduct at the Diamond-II Procurement Conference.
- Commenced work on a “Responsible Procurement” section of the Diamond Procurement webpages.
- Established the terms of reference for the working group whose purpose is to improve the understanding of Modern Slavery across Diamond.
- Continued, as ongoing practice, the activities listed in FY22/23.


### **Further steps**

During the course of FY 2025/2026, we intend to undertake the following further steps to combat slavery and human trafficking:

- Review the clauses relating to Modern Slavery in our procurement terms and conditions and update where required as a result of changes in law and/or good practice.
- Commence activities of the working group who will review how we act, implement, and improve understanding of Modern Slavery across Diamond, and to include developing an annual plan of work.
- Review the best practices of our shareholders and stakeholders.
- Identify further training opportunities across Diamond.

### **Board of Directors approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by Diamond’s Board of Directors on 1 July 2025.

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**Gianluigi Botton**

**Chief Executive Officer**

**at Diamond Light Source.**

Date: 02-Jul-25  
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