



GOVERNANCE

nccgroup[®]

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



NCC Group Anti-Slavery and Human Trafficking Statement

Issue date: 30 November 2023

Classification: Public

Introduction

At NCC Group, we uphold the highest standards of ethical conduct and take responsibility for the impact on the communities and clients we serve. Our colleagues and our supply chain partners play a critical role in upholding these standards, and we take steps to ensure that everyone contributing to our business operations recognises and takes appropriate steps to prevent and combat the challenges posed by modern slavery and human trafficking.

This statement outlines our approach and efforts in this regard and covers the reporting period of 1 June 2022 to 31 May 2023, in accordance with the requirements of the UK Modern Slavery Act 2015. This statement applies to NCC Group's UK business covered by the Act and is applied in principle and in line with local legislation for all NCC Group's global businesses to address the risk of modern slavery and human trafficking in our supply chain.

Our global business

NCC Group is a global cyber security and software resilience business operating across multiple sectors, geographies, and technologies. We operate as one global business, with in-country delivery tailored to local needs and cultures, as well as a global delivery team to respond quickly to our client's challenges.

We have a significant market presence in the UK, Europe and North America, and a growing footprint in Asia Pacific, with offices in Australia, Singapore, and our new office in Manila, the Philippines.

In NCC Group's UK business the following trading entities are covered by this statement:

- NCC Group Security Services Limited
- NCC Group Corporate Limited

The supply chains NCC Group engage with range from, but not limited to, global technical and distribution organisations, professional services, marketing firms and real estate for our leased office assets.

Policies and controls in relation to slavery and human trafficking

NCC Group has embedded ways of working that ensure slavery and human trafficking is not taking place across our business and conducts annual training with colleagues, supported by policies and procedures for colleagues and suppliers. Policies are available on our website, embedded links below:

- NCC Group's [Code of Ethics](#) outlines the values and principles that underpin everything we do and the responsibility our colleagues have in upholding these
- Our [Supply Chain Code of Conduct](#) clearly outlines the standards we expect from our suppliers, and supplier onboarding is managed by our global Procurement team to ensure compliance
- NCC Group deals responsibly and professionally with any genuine concern about any wrongdoing in our business. Our [Whistleblowing policy](#) is available publicly in seven languages, which represent the operating requirements in our global operations
- NCC Group's Human Rights policy is available internally citing that we observe and uphold the principles contained in the Universal Declaration of Human Rights and the International

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Labour Organisation Fundamental Conventions. We support freedom of association, the abolition of forced labour, and the elimination of child labour. We oppose all forms of unlawful and unfair discrimination or victimisation and our commitment to Human Rights ensures equality and fairness for all within our environment.

In 2023 we elected to pay all contracted staff through our UK Facilities and Property Manager supplier - CBRE - the Living Wage. NCC Group contracted colleagues in the UK are paid at least the Living Wage.

All our colleagues undergo identity and right to work checks as part of the recruitment process and prior to commencing employment with us. Reference checks and, where appropriate, criminal background checks also take place. We employ a large proportion of people directly or on a fixed-term basis with checks in place to ensure that the payment of salary is made directly to that person.

Supply Chain due diligence

NCC Group has a global Procurement Policy, which sets out the practice for responsible and ethical supplier onboarding. All eligible outsource partners or suppliers are required to publish their modern slavery and human trafficking statement, those out of scope are requested to sign the [Supplier Code of Conduct](#) to confirm their commitment to the principles of the UK Modern Slavery Act 2015.

Adherence to the Procurement Policy and all other policies in place across the Group are managed through internal and external audits. Additionally, NCC Group is regularly audited by clients to provide assurance and to support their supply chain and vendor management programmes. Our internal audit function is embedded into our global governance function and split into two key areas:

- Financial: focused on auditing all processes related to the integrity of our financial and accounting records and reporting
- Global standards and support: focused on auditing adherence to the policies, processes, and procedures, which support our ISO (International Organisation for Standardisation) 27001:2013, ISO 9001:2015 and ISO 1025:20177 certifications.

As part of the supplier onboarding process, NCC Group conducts screening for all new suppliers dependent upon the risk profile associated with the goods/services being provided, the commercial risk, the data protection and information security risk or health and safety risk. The Global Governance team review the screening results for high-risk suppliers and any items for concern are escalated to the named supplier for action.

NCC Group is currently a supply chain partner member of Eco Vadis with a Silver rating and rating scorecard is available upon request through their platform.

Areas of risk within our supply chain and the steps to assess and manage that risk

Areas of traditionally low paid labour such as cleaning, catering and security are our highest risk areas, particularly out with the UK. This requires regular communication with our facilities management supplier and local landlords and will remain a focus for our internal audit.

We do not have a specific ethics helpline; however, our Whistleblowing helpline is available to all contracted and subcontracted colleagues working in our business. In FY23 we did not receive any

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reports of violations of human rights or cases of modern slavery. Any cases raised would be investigated in line with our [Whistleblowing policy](#).

Ensuring slavery and human trafficking is not taking place in our business

All suppliers onboarded are checked and must accept our Supplier Code of Conduct conditions. This is further reinforced through our Standard Purchase Order Terms and Conditions, where suppliers must comply with applicable laws prohibiting modern slavery and human trafficking, including the UK Modern Slavery Act 2015.

We are continuing to develop key performance indicators to measure our effectiveness in addressing modern slavery risks. This will include establishing metrics that will be further improved and automated with the introduction of a new procurement platform in 2024.

Slavery and human trafficking training

Our annual and new starter compliance training is the foundation for our Code of Ethics. All eligible NCC Group colleagues /contractors are required to certify they understand and will abide by our Code of Ethics, global policies, and applicable local policies. In FY23 100% of colleagues completed the annual compliance training within the required six-week period.

By completing this training NCC Group colleagues acknowledged our commitment to human rights as well as other ethical and operational requirements that underpin our Code of Ethics to ensure responsible business conduct.

This statement, dated 30 November 2023, has been review and approved by the NCC Group plc Board and signed by:

Mike Maddison

Chief Executive Officer

NCC Group plc