

Anti-Slavery and Human Trafficking Statement

Our Commitment

This statement is made on behalf of NCC Group plc and its subsidiaries pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement for the financial year ending 31st May 2019 as approved by the board of directors.

Our Business and Ethics

NCC Group plc is a leading Cyber Security Company; public limited company registered in England and Wales (registered number 4627044) and is listed on the London Stock Exchange. The Group has around 1,800 employees and provides Escrow and Assurance Services across the world.

As a company listed on the Main Market of the London Stock Exchange, we always work to the highest ethical standards and comply with all laws, regulations and rules relevant to our business. Our reputation is paramount and we take our Corporate and Social Responsibilities very seriously. We realise that our relationships with those we deal with, whether clients, employees, shareholders, suppliers or the local community, are key to our success and as such we take our obligations and commitments to those people very seriously.

Our Approach

We expect the same high standards from those we work with and we are committed to doing everything within our control to ensure there is no modern slavery or human trafficking in any part of our business. Please click [here](#) to see our Anti-Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships.

Our corporate policies and procedures help to ensure that our Anti-Slavery Policy is complied with in full. In addition we have a clear Open Door Policy which is published on our intranet site so that if there are any genuine concerns about any wrongdoing or breaches of the law these concerns can be raised in confidence without fear of disciplinary action.

Our People

A fundamental role of our business is to keep our customers safe from Cyber threat; this also translates in the non-Cyber world; for both our own people and those working with us through our Supply Chains. We now have training available to our people which enables them to identify risk factors, understand the implications and assist us in implementing the Anti-Slavery Policy.

All our people undergo identity and right to work checks as part of the recruitment process and prior to commencing employment. Referencing checks and; where appropriate CRB checks take place. NCC employ most 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.

Our Supply Chain

Although Slavery is illegal in every country in the modern world it unfortunately still exists; and is a brutal form of organised crime whereby people are forced to work against their will under the threat of some form of punishment. The vast majority of these people are in the supply chains of legitimate industries.

Building on the sound foundations already laid; the Procurement team are reviewing and improving Supplier due diligence and on boarding. This is only strengthened by the significant investment we have made in Company Systems and Process redesign.

Our Journey

NCC Recognise that the fight against Modern Slavery is not static; therefore to improve our mitigation in the following financial year we will focus on further developing;

- Staff Awareness on Modern Slavery through improving training and communications
- Mapping the higher risk parts of our supply chain to gain further visibility down the tiers
- Reviewing our standard form of contracts to include additional protection such as warranties, right of audit, and indemnities

Approved by the Board of NCC Group plc on 28 March 2019 and signed by

Adam Palser
Chief Executive Officer
NCC Group plc