



SUPPLIER CODE OF CONDUCT

March 2021



NCC Group Supplier Code of Conduct

Issue date: March 2021

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Note: This Supply Chain Code of Conduct contains general requirements applicable to all NCC Group supply chain partners. Contracts may contain more specific provisions. We expect our partners to act only in accordance with the code of conduct and contract, but also in accordance with its spirit.

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Introduction

Our customers, and colleagues respect us for providing a trusted service, and to achieve this we rely on our supply chain partners to support our business operations.

We are fully aware of the responsibility we have toward our customers, colleagues, and communities in which we work, and we seek to work with supply chain partners who are equally aware of and proud to uphold these high standards.

Our relationship with supply chain partners is based on trust, collaboration, and continuous improvement, underpinned by fair contracts.

We, and our customers expect our supply chain partners (and their supply chain) to behave ethically, securely and to treat everyone fairly and with respect.

Supply chain partners are an extension of the NCC Group team, and this code exists to clearly articulate the standards and behaviours we expect to see in our supply chain partnerships.

Health and Safety

Supply chain partners must comply with all applicable health and safety regulations and provide a safe environment to work that is conducive to good health and wellbeing, while preventing accidents, injuries, and work-related illness.

Labour Standards

All supply chain partners must abide at a minimum, to the highest standard of human rights and employment laws. This includes but is not limited to:

- No forced, bonded, or involuntary labour
- No use of child labour
- Working conditions that are safe and hygienic
- Freedom of association to join or form a trade union to bargain collectively
- Living wages are paid
- Working hours are not excessive
- No discrimination of any kind based on race, religion, disability, age, sexual orientation, gender or any other characteristic.

We expect partners to always behave legally, respectfully, and professionally to all persons in the course of any work with us.

Sub-Contracting

We expect supply chain partners to deal fairly with sub-contractors/and partners in their own supply chain and inform NCC Group when subcontractors are required to be used.

Supply chain partners will both communicate and govern the implementation of the principles of the NCC Group Code of Ethics to their sub-contractors/partners.

Data Protection

All supply chain partners are expected to fully comply with GDPR, and where applicable, other data protection regulations with their own jurisdiction when processing, storing, or transmitting personal NCC Group data.

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A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss alteration, unauthorised disclosure of, or access to, personal data.

Any breach must be notified to NCC Group within 24 hours via: DataProtection@nccgroup.com

Information Security

All supply chain partners are expected to look after NCC Group information that is entrusted to them.

Partners are expected to have sufficient technical and procedural controls to protect NCC Group information on their systems, and premises, and detect and respond to attacks that might expose it.

Ideally those controls will exist within a recognised framework, such as the ISO/IEC 27000 family of standards, with compliance demonstrated by independent certification.

Any break of NCC Group information must be notified to NCC Group within 24 hours via:

InformationSecurity@nccgroup.com

Business Continuity Planning

All supply chain partners must proactively review their business continuity plans regularly to mitigate as far as possible the impact of any unforeseen disaster on NCC Group operations.

Compliance and Sanctions

We reserve the right to check compliance with the requirements of the Supplier Code of Conduct and terminate any contract for breach of this standard.

Supply chain partners are requested to publish their modern slavery statements, for better transparency, irrespective of turnover.

Anti-Bribery and Collusion

We expect our supply chain partners to adhere to all anti-corruption laws, including but not limited to the UK Anti-Bribery and Corruption Act 2015.

A zero-tolerance policy is operated against any form of corrupt practices and supply chain partners should:

- Have robust processes in place to ensure that both they and their own supply chain comply with these laws
- Proactively look to identify and mitigate any risk of fraud in their business.

Supply chain partners must not offer services, gifts or additional benefits to NCC Group colleagues to influence decision making.

Should any collusion occur, supply chain partner/individuals involved will be reported to the appropriate authorities and excluded from any future work with NCC Group.

Confidentiality

Any information a supply chain partner receives through business dealings with NCC Group must be deemed as confidential, and not be disclosed to any third-party without the prior consent of NCC Group. This includes but is not limited to commercial, personal, and technical information.

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Where necessary, all suppliers must sign up to NCC Group's non-disclosure agreement before any information can be shared.

Prospective suppliers may be required to return a signed copy of a non-disclosure agreement before being included in any commercial process.

Use of the NCC Group logo or any public declaration of partnership/marketing endorsements must be requested in writing to the NCC Group press office: press@nccgroup.com

Conflicts of interest

We expect our supply chain partners to both declare and mitigate any conflicts of interest that may affect or be perceived to affect any impartial judgement.

Sustainability

We expect our supply chain partners to proactively reduce waste and improve the supply chain impact on the environment while supporting us to report on positive environmental impacts.

Supply chain partners must also ensure they undertake responsible business, taking a leadership position in both the community and social issues relevant to their own business operations (including subcontractors in their supply chain), and are transparent about their actions in these areas.

Continuous Improvement

We expect our supply chain partners to use best industry standard practices when delivering goods and services.

Supply chain partners are encouraged to continuously deliver innovative ideas to improve the cost, quality, and process by which goods and services are delivered to NCC Group and our companies. Supply chain partners are expected to fully support us in our strategic challenges and business growth targets.

Whistleblowing

We are committed to maintain the highest standards of honesty, openness and accountability. If you do not feel able or comfortable raising your concerns with a NCC Group colleague, you can use our anonymous and confidential Whistleblowing partners – Safecall: NCCGroup@safecall.co.uk

Contact for further information: procurement@nccgroup.com