

Anti-slavery and human trafficking policy

Introduction

NCC Group plc and its subsidiaries (together referred to as “the Company”) recognises that modern slavery is a crime and a violation of fundamental human rights. The term modern slavery includes not only slavery but also servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains. The Company communicates its zero tolerance approach to all its suppliers, contractors and business partners at the outset of the relationship and regularly thereafter. It expects high standards from all of its contractors, suppliers and other business partners, and also expects that its suppliers will hold their own suppliers to the same standards.

Scope

This policy applies to all employees, agency staff and other contractors operating on Company premises.

Breach of Policy

Individuals that knowingly breach of this policy will be subject to disciplinary action up to and including dismissal.

This policy does not form part of any employee's contract of employment and may be changed by the Company in its absolute discretion at any time.

Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.

The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for the Company or under its control. Any concerns about any issue or suspicion of modern slavery in any parts of the business or its supply chains should be raised at the earliest possible stage. You should notify your line manager or if this is not appropriate you should use the Open Door Policy.

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