

Code of Ethics

Treat everyone and
everything with equal respect



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What is this?

A guide to help you understand the values and principles that underpin everything we do and your responsibility in upholding these.



Who does it apply to?

This Code applies to everyone acting for or on behalf of NCC Group:

- The Board of Directors has overall responsibility for ensuring this is applied
- The Executive Committee is responsible for ensuring all colleagues understand and comply
- And everyone is responsible for living the values and principles outlined in this Code and reporting any violations to their line manager or via the confidential whistleblowing helpline.



What are the key points?

- We act in a professional, honest and ethical manner in all our dealings with customers, colleagues, shareholders, suppliers and our communities
- We operate a confidential whistleblowing helpline
- We operate our business sustainably, always seeking to improve the impact we have on the communities in which we operate
- We believe in long-term relationships with our customers, earning their trust in the delivery of a high-quality service
- We will not do business with customers where it would compromise our own values and principles
- We endeavour to provide a real and sustainable return on shareholders' investment in our business
- We treat our suppliers and business partners with respect and value a mutual beneficial relationship
- We will not tolerate breaches to our Code of Ethics and any issues raised will be subject to a fair and proper investigation.



What action should I take?

Read the following Code to understand how it applies in the context of your role. Talk to your line manager if there are any aspects of this you do not understand or email the compliance team.

Introduction

It is our responsibility to ensure that we set the standard and uphold the highest levels of integrity in everything we do.

We believe in the principles of the Universal Declaration of Human Rights and the International Labour Organisation Fundamental Conventions. We have zero tolerance to modern slavery and make our ethical values and principles clear to all.

Integrity is at our core and our zero tolerance extends to bribery and corruption, wherever and in whatever form that may be encountered.

To keep society safe and secure and to be trusted by our customers is at the heart of how we do business. It is our colleagues who bring this to life every single day. The values we uphold with each other are:

- We work together
- We want to be brilliantly creative
- We embrace difference

We welcome people to NCC Group based on merit, suitability and ability to uphold these values.

Our number one priority is the health, safety and well-being of our colleagues regardless of where they are working – on a customer site, an NCC Group office or at home.

The impact we have on the environment around us is important too: we have a responsibility to ensure that we support protecting the future.

We have policies in place to support and guide us to ensure we protect and continually improve how we work. These include:

- Human Rights Policy
- Anti-Bribery and Corruption Policy
- Gifts and Hospitality Policy
- Health and Safety Policy
- Environmental Policy
- Supplier code of conduct

These policies are available for colleagues to view on the Global Governance Hub.

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How this works in practice

To achieve the highest standard of operations we ask all colleagues to uphold inherent values of honesty, integrity and quality. The relationships we have with each other and our external stakeholders are important and we must always treat any relationship with respect.

Everyone has a responsibility for ensuring we continually meet these high standards. Here's how we expect the code to work in practice:

For colleagues

Our commitment is to NCC Group first and foremost and we do not undertake personal or other business activity which may conflict with the interests of the business.

We treat each other with respect and are mindful of the consequences of our actions. We do not tolerate harassment, bullying or any discrimination against each other or our stakeholders.

We expect colleagues to comply with applicable laws and regulations in all aspects of their day-to-day business activities. Seek advice from the Compliance and Legal teams if you need support.

And if things go wrong, we speak up without fear of reprisal – we raise concerns following the correct procedure and enable fair and proper investigation to quickly manage any situation.

For customers

The relationship we have with our customers is important. We believe in building long-term sustainable relationships, earning trust through meeting their needs and delivering the highest quality of service. We evaluate our performance and welcome feedback to ensure we continually improve, and we deal with any issues swiftly and properly.

We win business fairly and we use our internal process to assess and consider carefully doing business with any customer which may compromise our code of ethics.

For shareholders

We value the investment our shareholders have made in our business and we endeavour to provide a real and sustainable return for that trust. We will provide accurate and timely information to shareholders and at all times observe the relevant regulations and corporate governance principles to protect the integrity of our business operations.

For suppliers and partners

We enter into any supplier or partner relationship with a mutual understanding of each other's code of ethics and general business policies. We have in place a supplier code of conduct to ensure we protect the integrity of our ethics across the supply chain.

For the community

The communities we live and work in play an important role in our day-to-day business. We actively support colleagues to develop and support local initiatives that benefit their communities. Globally, we seek to inspire the next generation of cyber scientists through our own education programmes and working with partners.

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Issue date: 8 September 2020

How we manage issues

We encourage everyone to speak up if they believe that someone is not operating in accordance with our code of ethics. Colleagues can raise this directly with their line manager or via our anonymous and independent whistleblowing helpline.

We investigate any suspected breaches fairly and thoroughly. A breach of our code of ethics by a colleague may result in disciplinary action including asking them to leave the business. Any conflicts between our code of ethics and those of a customer, supplier or partner would be discussed and appropriate decisions taken to ensure we uphold our values.

The Chief Executive Officer oversees all investigations in relation to breaches of the code and our Chief People Officer is always available to colleagues to discuss any concerns.

How we communicate

We are proud of our Code of Ethics. It is made available to any person (permanent or interim) joining NCC Group and their understanding is assessed. Internally, colleagues can access a copy of the latest copy via the Global Governance Hub. Externally, it is available from our Group website:

www.nccgroupplc.com

Keeping the code relevant

We review and update this Code regularly. Any changes will be communicated to all colleagues via email and supported by follow up conversations with their team leaders to check understanding of how it applies to their role.

Security and confidentiality agreement

The nature of this document is subject to the security requirements of NCC Group. Ownership and responsibility for this document remains that of the NCC Group Compliance department

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