

## **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 31<sup>st</sup> May 2019 as approved by the board of directors.

### **Our Business and Ethics**

NCC Group plc is a leading Cyber Security public limited company registered in England and Wales (registered number 4627044) and is listed on the London Stock Exchange. The Group has around 2,000 employees and provides both Escrow and Assurance Services across the world.

As a company with a Premium listing on the London Stock Exchange, we always work to the highest ethical standards and comply with all laws, regulations and rules relevant to our business. We have a zero tolerance to Modern Slavery, and we realise that our relationships with those we deal with, whether colleagues, clients, investors, suppliers or the local community, are key to our success and as such we take our obligations and commitments to these stakeholder groups very seriously.

### **Our Approach**

We expect 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 or associated supply chain. The NCC Anti-Slavery Policy is readily available on our website.

In the previous 12 months, we have developed a formal Procurement strategy and enhanced both the systems and team itself, to allow us to better control our cost base and Supply Chain operations, in conjunction with other departments across the business.

Our corporate policies and procedures further aid us in ensuring that our commitment to combatting Modern Slavery continues. In addition we have a Whistleblowing 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 into the non-Cyber world, for both our own people and those in our Supply Chain. We have training available for our employees which better informs them to identify risk factors, understand the implications and assist us in implementing our Anti-Slavery Policy.

All our employees undergo identity and right to work checks as part of the recruitment process and prior to commencing employment. Reference checks and, where appropriate, criminal background checks also take place. NCC employs 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.

### **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 or detriment. The vast majority of these people are in the supply chains of legitimate industries.

We spend c.£60m globally per annum with our Supply Chain Partners ranging from, but not limited to, the procurement of IT hardware and Software licences, Facilities Management services, and a wide range of Professional Services. Our highest risk of Modern Slavery is therefore within our supply chain owing to its size and complexity. As a result, we have built upon the foundations already laid and will make an even greater positive step change in 2020. Through better communication, education and collaboration, we will mitigate any potential risks of modern slavery to our business operations. As we develop our thinking around Modern Slavery we will continue to update our Procurement and Governance processes to ensure

compliance to both legal requirements and industry best practise. This includes working with CIPS and other industry peers to identify further areas of opportunity to improve.

### **Our Journey Continues**

We are proud of our progress, but NCC recognises that the fight against Modern Slavery is not static. Therefore to improve our mitigation in the following financial year we will focus on the following agenda items;

- Improved employee awareness on Modern Slavery through updated training.
- Mapping the higher risk categories of our supply chain to better understand where our risks lie, allowing us to introduce a more appropriate level of contract management.
- Reviewing our standard form of contracts to include additional protection such as warranties, right of audit, and indemnities. This includes a full review of our sourcing documents to support supplier selection and contracting.
- We will introduce a Global Supplier Code of Conduct, and encourage all of our suppliers to sign up to it. The Code of Conduct will reinforce that Modern Slavery Statements should be published, irrespective of the current guidelines on turnover (£36m).
- Greater visibility and communication with our Supply Chain Partners and industry peers.
- Creation of a new Procurement strategy for the NCC Group Globally, that will introduce enhanced processes to better control who we spend our money with, and the due diligence required prior to placing orders.
- Technology transformation to gain better transparency of our business operations and tiered supply chain.
- Development of closer working relationships with internal governance teams to conduct effective audit reviews of both our internal processes and how effectively our Supply Chain Partners are implementing their best practises towards modern slavery prevention. Reinforcement to all parties of the escalation process.

This statement was approved by the Board of NCC Group plc on 27<sup>th</sup> November 2019 and signed by

Adam Palser  
Chief Executive Officer  
NCC Group plc