



Communication on Progress

United Nations Global Compact
September 2022

nccgroup 

This Communication on Progress refers to the period 1 June 2021 to 31 May 2022 providing an overview of our Sustainability framework, progress and commitment to the United Nations Sustainable Development Goals and action in support of the United Nations Global Compact 10 principles.

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We set objectives that consider people and the planet, and we take responsibility for the role we play in creating a safe and secure digital future for society.

Enabling a safe and secure digital future

NCC Group is a global cyber security and software resilience business, listed on the London Stock Exchange, operating across multiple sectors, geographies and technologies.

As society's dependence on the connected environment and associated technologies increases, we use our global expertise to enable organisations to assess, manage and develop their cyber resilience posture to confidently take advantage of the opportunities that sustain their business growth.

We operate as one global business, with in-country delivery tailored to local needs and cultures, as well as a powerful global delivery team to respond quickly to our customer's challenges.

With over 2,000 colleagues, we have a significant market presence in the UK, Europe and North America, and a growing footprint in Asia Pacific with offices in Australia, Japan and Singapore.

Our total FY22 Group revenue (up to 31 May 2022) was £314.8m (US\$ 397.4m, AUD \$553.1m, €370.3m).

View the [FY22 Annual Report](#) for our full financial publication or the Investor library of results and media on our website: <https://www.nccgroupplc.com/investor-relations/results-media/>

Our values:



We work together
We have each other's backs



We are brilliantly creative
We look at things differently



We embrace difference
We respect each other



We take responsibility
We get things done in the right way



Statement of continued support



I am pleased to confirm that NCC Group continues to support the Ten Principles of the United Nations Global Compact in the three areas of Human Rights, Labour, Environment and Anti-Corruption.

Joining the business in July 2022, I am also pleased to restate our commitment on behalf of the Board as the new Chief Executive Officer of NCC Group plc.

Mike Maddison
Chief Executive Officer
NCC Group plc

This is our first annual Communication on Progress, and covers our broader Sustainability agenda, which demonstrates how we continue to integrate the Global Compact and its principles into our business strategy, culture and operations.

Throughout the report there are links to further reading on our progress.



Read more about NCC Group and our Sustainability commitment in our FY22 Annual Report available to download from our website and view online.

<https://www.nccgroupplc.com/investor-relations/results-media/annual-report-2022/>

Our sustainability framework

Our sustainability framework sets out our global focus areas, and we empower local action to bring this to life.

We have selected three areas of focus based on the critical elements of our growth strategy. We have not yet conducted a full materiality assessment with our stakeholders and that will come.

For now we have drawn insights from customers through the bid process to determine what matters to them, from shareholder conversations and colleague surveys and through third parties – like Planet Mark, who we are working with to map our net zero journey

Sustainability is how we do business – it is our licence to operate. Grounded in our values and principles, we're guided by our Code of Ethics and driven by our mission to make the digital world safer and more secure for all.

Cyber resilience is an integral part of all organisations' sustainability agendas – it's a material risk that should be top of mind for all, regardless of what industry or sector.

We use our global insights to help organisations assess, develop and manage their cyber resilience posture, enabling them to confidently and securely take advantage of the opportunities that sustain their business growth.



We draw on our expertise, capabilities and global footprint to develop solutions to meet current and future cyber challenges.

We help to educate policymakers and regulators. We give back to protect our local community service and we share opportunities to experience the world of cyber and inspire the next generation to secure our future.

Sustainability is about ethical, responsible business practice, delivering on our promise to shareholders while balancing social and environmental factors.

Our approach to sustainability is focused on the recognised elements of environment, social and

governance (ESG). These are brought to life with our framework, which enables us to focus our efforts on the activities that create the greatest value for our stakeholders.

Further reading:

Read more on our business model on pages 18 and 19 of our [FY22 Annual Report](#)

Read more on how we manage and monitor risk in relation to sustainability on pages 64 to 72 of our [FY22 Annual Report](#)

UN Sustainable Development Goals

The United Nations Sustainable Development Goals provide us with a blueprint to achieving a better and more secure digital future for all. We selected the following goals, which we felt were most relevant to our business and to our stakeholders



3 – Good health and wellbeing

With the increased pressures of a pandemic and the intensity of the work we do, we put a great deal of effort into our wellbeing programme for colleagues.

We recognise the impact of inclusion and diversity on wellbeing, and we encourage real conversation about topics that matter personally to our colleagues. And we invest in resources and policies that further strengthen this commitment.



9 – Industry, innovation and infrastructure

Our commitment to research, vulnerability disclosure and threat intelligence and the industry partnerships we foster help to provide safe and secure by design technologies.

Working across multiple industries globally, we have practice and sector experts who continually research, monitor and develop future solutions to enable sustainable and confident growth for these organisations.



4 – Quality education

As a pure play cyber expert, we are committed to investing in the cyber skills that will be needed in the future. From our global research programme, to investing in LinkedIn learning, we also sponsor colleagues to undertake external accreditations. And we offer a Next Generation Talent programme to enable a non-traditional route into cyber.



13 - Climate action

While not a material risk due to the nature of our business, we believe in taking responsibility for the part we play in protecting the planet. We have partnered with Planet Mark to support us on our journey and our priority was to certify our current carbon footprint before we embark on a programme to reduce our impact.



5 - Gender equality

We are committed to building a diverse and inclusive culture for all and we take responsibility for playing our part in the global challenge of not only encouraging more women into technology, but also about ensuring a level playing field for career progression.

We are investing in early careers programmes, our own and in partnership with others, and with the development of policies and resources that support colleagues at whatever stage of life they are at, and our career paths framework, we are building a foundation to create a successful environment to achieve our ambition.



16 - Peace, justice and strong institutions

Our value proposition is based on trust, and this is founded on our Code of Ethics, considering the interests of all our stakeholders when we make decisions on the Group's future strategy and priorities. our ambition.

Progress on areas related to the 10 principles of the Global Compact



Creating an inclusive and diverse workplace



UN Global Compact Principles addressed either directly or indirectly in this section of our Communication of Progress:

1. Businesses should support and respect the protection of internationally proclaimed human rights
6. Eliminate discrimination in respect of employment and occupation

We are a people business with over 2,000 people focused on making the digital world safer and more secure. To achieve this we must ensure that our NCC Group community is as diverse as the world we represent, so we continue to foster partnerships that support this.

We empower local action in support of our communities, and through our colleague resource groups, we encourage conversations that matter on a broad range of social topics to make NCC Group a great and respectful environment for all.

We are guided by our Code of Ethics and our values, which define our behaviours – treating everyone and everything with respect.

This is the foundation of our culture, and we strive to create an environment where everyone is welcome and can be successful

Creating a network of allies

In 2021 our colleague resource groups led a piece of work to explore how we could create an environment to empower everyone to be an active ally for all.

We selected Oakridge Training Centre as our partner, and the concept was launched by the CEO to all colleagues in a live virtual event in November 2021.

Our campaign and training – Action Ally – is focused on equipping colleagues with skills they can use in both their personal and professional life to be an active ally.

Complementary to our broader inclusion and diversity annual training, Action Ally training began in the second half of our financial year with the Executive Committee and senior leaders. It began rolling out to colleagues during 2022 as well as being built into our onboarding programme to underpin our values and behaviours and Code of Ethics.

Wellbeing

We recognise the past two years has been tough for everyone, and as we evolve from the learnings of the pandemic, we continue to put emphasis on creating an environment that supports colleagues regardless of their physical or mental wellbeing.

Mental health

In addition to our standard wellbeing policies and resources such as Employee Assistance Programmes that support colleagues at every stage of their life, we have a Mental Health First Aid network.

Over 60 colleagues around the world have undertaken accredited training to provide support to their colleagues with their mental health. We also offer a mental health module to managers to create awareness and further support colleagues in the workplace.

Physical wellbeing

In addition to mental wellbeing, the pandemic has created challenges for physical wellbeing. With restrictions still impacting many of our operations in the first half of the last financial year, we continued to look at changing needs for colleagues to work confidently and safely.

Where restrictions were in place, and where permitted, we provided a way for colleagues who had a critical need for office working space to access this.

Each of our offices has an onboarding document that outlines the responsibility of users, and how to stay safe in the working environment.

Flexible/hybrid working continues as an option for colleagues and we continue to assess the evolution to our future world of work, with our primary focus ensuring we meet our customers' needs.

Performance management

Our ambition is to be known as a hub for cyber talent, a place where people can develop personally and professionally. We offer a broad range of career options across our technology, sales and professional practices. We are creating an inclusive environment to grow, and we have an embedded transparent performance management process.

Colleagues and their managers are encouraged to meet on a regular basis to review performance, with a formal and documented bi-annual process at the half-year and full-year stage. The performance review plays an important role in supporting colleagues' personal development opportunities, while providing role purpose and clarity. The introduction of career paths to guide career options, our commitment to internal mobility and the open approach to vacancies support our ambition to retain our talented teams and enhance careers within the Group.

Learning and development

We provide tools and access to learning so colleagues can take responsibility for their own development – including LinkedIn Learning. We build learning and development programmes to support colleagues to develop their careers through technical certifications, and further and higher education qualifications to build the cyber and professional skills to secure growth in the future.

Dedicated sales and technical training academies further enhance our offering. We are proud to have established our Next Generation Talent programme, which provides opportunities for talented new entrants to the cyber industry and we are ready to launch our foundation programme encouraging greater diversity by providing an additional non-traditional entry route into cyber.

Career pathways

We are investing in career pathways to support colleagues to clearly see how they can progress and, supported by our performance management and development process, understand what skills and experience they need to do this.

The career pathways have been rolled out to colleagues in technical and sales roles in the UK, across several of our professional functions, and continue to be developed for our global business, building on feedback from colleagues themselves, alongside professional input.

To support our mission, and to enhance our position as a hub for cyber talent, we also continue to take part in industry conversations relating to careers and learning and development for cyber skills and the global skills shortage.

In March 2022 we contributed to the UK's Department for Digital, Culture, Media and Sport's (DCMS's) consultation on "Embedding standards and pathways across the cyber profession by 2025". NCC Group has a vital role to play in the future of the cyber security industry.

Gender diversity

We take our role as a responsible employer seriously and see the UK requirement to publish gender pay gap figures as an important step towards transparency around a key issue within the broader world of business.

We recognise steps need to be taken to continually improve our gender mix at all levels as part of our broader strategy.

Read our latest Gender Pay Gap Report online:

www.nccgroupplc.com/sustainability/social/gender-pay-gap.

Key achievements

- Launched a career framework and learning pathways pilot for our UK Assurance delivery colleagues across technical, consulting and management functions
- Launched the Next Generation Manager programme in North America and UK following a successful pilot in our Software Resilience division (where 100% of the initial cohort are now in manager roles)
- Promoted over 280 talented team members
- Gender decoded our job adverts and piloted the redaction of CVs to remove unconscious bias
- Continued our partnership with Uptree and Capslock to improve the gender diversity of our foundation and classic entry programmes.

Future focus

FY23 will be the year we focus on improvements to the colleague experience at NCC Group, with investment in onboarding and global career pathways building on our pilot in the UK, and redefinition of a compelling colleague proposition, underpinned by investment in leadership and management development. We are committed to improving the gender balance in our organisation through partnerships and outreach.

Spotlight: Enabling the next generation of talent

In a world where everyone wants the best tech talent, to meet the demands of the exponential pace of digital transformation, and with a global skills shortage, we took the early decision to build our own capability to feed the growing demand for our services and the growth of our business.

Building on the strength of our Next Generation Talent programme, we started searching for future cyber talent in completely different sectors. We look for people with the attitude and aptitude to start a career in cyber who, with support of a tailored training programme, could discover and unlock their full potential. Of the 115 people who joined our programmes in the UK, North

America and APAC, this included Emma, who joined the UK programme as a former childcare specialist and has been offered "the greatest career growth for her future in cyber security", and Nick, who left his job as a recruitment consultant in Florida to start his "dream job" with NCC Group.

In parallel, we introduced career paths linked to each of our technical job grades focused on structured progression for our more experienced consultants. The promotions create space for the junior consultants we have trained – it's a win/win for everyone.

This resourcing engine has fuelled our growth in FY22, creating opportunities for our colleagues and a reduced reliance on the external labour market, and has secured top talent to deliver for our customers.

[See pages 34-35 of the FY22 Annual Report for more](#)

Creating an inclusive and diverse workplace continued

Colleague resource groups

We want to create an environment where all colleagues feel psychologically, emotionally and physically safe to be authentic, representative of the diversity of the world they live in, share their personal experiences and have equal opportunities to achieve.

Our inclusion and diversity plan underpins our growth strategy and continues to evolve as our voluntary colleague resource groups, established in 2020, embed into our way of life at NCC. In addition to resource groups for our four focus areas: Gender, LGBTQIA+, Neurodiversity and Race and Ethnicity, we have welcomed the formation of new groups for Accessibility, Climate Change and Giving Back.

Colleagues who wish to create a group gauge interest, given Executive sponsorship where appropriate, and supported by the corporate affairs team to set the foundations and engage members and our wider stakeholders.

At the heart of this engagement is our NCC Conversations programme, which creates opportunity for colleagues to get involved in conversations across a broad range of topics. NCC Conversations range from blogs, panel sessions and resources, to providing toolkits for managers to lead the conversations locally.

Women's International Network

The Women's International Network is complementary to our colleague resource groups and is designed to:

- Create a safe space for women to be themselves
- Inspire development of and attract more women to NCC Group

The network is for those who identify as women and who are passionate about making NCC Group an even greater place to work. Connecting globally via Teams the network is divided into local chapters led by senior women to ensure we have sponsorship at the highest level.

Over the past financial year we saw the establishment of a Breast Feeding Support Group, the launch of our Menopause Library and Support Group, and a month long International Women's Day campaign, bringing colleagues together in our local offices as well as virtual events.

Future focus

We have joined the Menopause Workplace programme - Henpicked and are working towards a Menopause Friendly Accreditation. We are also continuing our investment in supporting Neurodivergent colleagues, with work started on creating a library of resources including manager guides and training resources to further enhance the support we provide.

Celebrating our colleagues



Back by popular demand, and with an enhanced programme of activity after the success of the launch in 2021, this year we celebrated colleagues who role model our values and behaviours through our NCC Diamonds colleague recognition programme. The programme had over 700 nominations by colleagues across six individual categories and one team category. Divisional winners were celebrated and put forward to the global judging round.

The awards are testament not only to those nominated, but to those who have taken time to write the most heart-warming references about their colleagues. Instilling a sense of pride and accomplishment, NCC Diamonds highlights the value we place on the role everyone plays in making the digital world safer and more secure

Our 2022 Global NCC Diamonds

- **Working together** - Eric Baker
- **Being brilliantly creative** - Sosthene Robin
- **Embracing difference** - Dhruv Verma
- **Taking responsibility** - Natasja Goosen
- **Giving back** - Tennisha Martin
- **Team award** - Threat Intelligence (Matt Hull, Ian Usher, Daniel Farrie, Izzy Moore, Jack Hirst, Bhaskar Dercon, Sophocles Theodorou and Matthew Griffen)

In addition to colleague nominations, **CEO appreciation** awards were given to:

- Melba Thomas
- Charlana Tanner
- Kelvin Mutasa
- Willemijn Rodenburg
- Chloe Kersey

And Rob Chatters was awarded the **CEO Choice** award.

[Find out more in our FY22 Annual Report on page 54](#)



Reducing our impact on the environment



UN Global Compact Principles addressed either directly or indirectly in this section of our Communication of Progress:

7. Business should support a precautionary approach to environmental challenges
8. Undertake initiatives to promote greater environmental responsibility
9. Encourage the development and diffusions of environmentally friendly technologies

We have partnered with Planet Mark to support us to map out how NCC Group will achieve the net zero requirement by 2050 and will be hosting workshops from the Board down to achieve this.

We started the conversation last year, hosting virtual and local conversations with colleagues around the world. Through the work we've done to report against the Task Force on Climate-Related Financial Disclosures (TCFD) we discovered opportunities for our business to play a more active role in helping other organisations to reduce their impact on the planet.

Climate related financial disclosure in line with TCFD guidelines

This is NCC Group's first year reporting against the Task Force on Climate-Related Financial Disclosures (TCFD) requirements.

In line with listing rule 9.8.6R(8) we have produced TCFD disclosures, which are consistent with the TCFD recommendations and recommended disclosures across the governance, strategy, risk management, metrics and targets pillars.

In assessing whether the disclosures are consistent, we have referenced section C of the TCFD Annex entitled 'Guidance for All Sectors'. For strategy we comply with disclosures (a) and (b) but for (c) we need to map out our net zero journey and review our scenario analysis and assess the resilience of NCC Group against our risks.

This further work is included as a target in our full report and will be published in next year's TCFD report. Furthermore, for each pillar we have included a table which describes our current disclosure, our developments achieved in FY22 and our focus areas for FY23.

Our overall exposure to physical and transitional climate change is considered low due to the nature of the business and can be reduced through the strategy and journey we've outlined in our full report.

The scenario analysis for physical risks (flooding, earthquakes and storms) does not pose a high risk as there are mitigating controls in place and business interruption would not be significant.

Alongside the risks identified we have a significant opportunity as the market develops and industries invest more in climate change.

For example, we currently work with customers which specialise in developing technology for electric vehicles, renewable energy (wind and solar), operational technology and other technical application work.

View the full TCFD report in our [FY22 Annual Report](#) or via our [Sustainability Resource centre online](#).

Greenhouse Gas emissions

Our Scope 1, Scope 2 and Scope 3 emissions were calculated in FY22 by Planet Mark in line with the GHG Protocol Corporate Standard.

Planet Mark has calculated this from verified third party data and invoices as part of our overall carbon certification. The certification has not been independently audited by KPMG.

The Scope 3 emissions for transmission and distribution and travel distances were calculated using the units of energy consumption and travel distances provided respectively multiplied by the relevant BEIS emissions factors.

Some conversions were used, for example GJ to kWh and miles to km. Scope 3 emissions are not the full scope in FY22 but we are working on the data requirements for this with Planet Mark.

See page 44 - 45 of the [FY22 Annual Report](#) or our latest [Streamlined Energy Carbon Report](#) for more information.

Reducing our impact on the environment continued...

Our journey to net zero

Over the next financial year, we will work with Planet Mark to develop our net zero plan (following the net zero standard defined by the Science Based Targets initiative and associated timelines, including full Scope 3 emissions disclosures. This includes verification of our carbon footprint and workshops, energiser sessions and masterclasses for the Board, Executive and broader colleague community.

Our net zero plan will allow us to identify areas of higher carbon intensity and allocate targets to reduce these in line with the Paris Agreement. Meanwhile our carbon footprint measurement calculated for our full financial year ended 31 May 2022 has identified our current usage, 1,253.6 tCO₂e, and targets for our total carbon footprint to reduce by 62.7 tCO₂e, our total carbon reduction to be 5% and our carbon reduction per colleague to be 0.03 tCO₂e.

Targets and metrics:

- To reduce our carbon footprint by 5% over the next financial year
- To develop our net zero plan and associated timelines by 31 May 2023
- To improve the scope of our data and analysis working with landlords of shared buildings and our supply chain

Car fleet

We currently have several company car scheme vehicles in the UK and the Netherlands, of which a number are already electric or hybrid. However, in February 2022 it was agreed that in the UK we would move from a company car scheme to a salary sacrifice scheme offering only electric or hybrid vehicles to all colleagues. This will provide all UK colleagues with the opportunity to afford an electric vehicle and will help further reduce our carbon footprint for business drivers as well as reducing the impact on local communities for social and domestic use.

Target and metric: By 2027 the car scheme will be fully electric or hybrid and have moved to a salary sacrifice scheme.

Directors' remuneration

The CEO and CFO are assessed on climate related performance metrics as outlined in the Directors' Remuneration Report section of our [FY22 Annual Report on pages 106 to 127](#). A target is set on assessing colleague engagement, diversity and corporate social responsibility.

Spotlight: Eco-design in practice

We are building a network of climate change champions across our business and our aim is to empower colleagues to unleash their creativity and own our net zero journey.

An example of this in action sits within the corporate affairs function, where our Global Head of Digital Communications, working with our digital partners Nexer, is leading the development of sustainable UX and development practices for our corporate and business websites.

This eco-design approach, anticipating and taking action to minimise negative environmental impacts, also contributes to our governance approach to security as well as improving our user experience and supporting our growth strategy through increased efficiencies.

Getting started

We performed a sustainability audit, which enabled us to set benchmarks for future improvement measures – this included capturing the carbon footprint of our eight key website pages, chosen by their size and number of visits.

We already use Microsoft Azure for hosting, which uses green powered servers, using c.50% renewable power to power its data centres. We've started to look at Microsoft's Emissions Impact Dashboard, so that we can scrutinise usage, and start to make some logical recommendations to reduce our impact, based on what the data is telling us, scaling down on resources where we can, in line with users' behaviours on the site.

This broader range of insights has enabled us to consider where to invest development and in FY23 we will:

- Upgrade our Umbraco Content Management System and hosting, which will run on less powerful hardware in Microsoft Azure with the same performance, leading to both cost and energy savings
- Redesign website pages and components, based on these broader data insights, so users can find content quicker, in fewer clicks. We'll also use this data to explore what devices people are using and whether there is an opportunity to make design decisions, such as device dark mode.

// Sustainability offers us the opportunity to be innovative and to challenge traditional design methods and thought processes that not only reduce our impact on the environment but create greater value for all our stakeholders

Being an ethical and responsible employer and supply chain partner



UN Global Compact Principles addressed either directly or indirectly in this section of our Communication of Progress:

1. Business should support and respect the protection of internationally proclaimed human rights
2. Make sure they are not complicit in human rights abuses
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
4. The elimination of all forms of forced and compulsory labour
5. The effective abolition of child labour
6. The elimination of discrimination in respect of employment and occupation
10. Businesses should work against the corruption in all its forms, including extortion and bribery

We are committed to building long-term sustainable relationships, earning trust through understanding the challenges our customers have and delivering high quality solutions to take their pain away.

We will do business fairly and use our internal processes to assess and consciously accept working with customers and suppliers which align with our own values and Code of Ethics.

We take responsibility to provide accurate and timely information to shareholders and always observe relevant regulations and corporate governance principles to protect the integrity of our business operations.

We consider the interests of all our stakeholders when we make decisions on the Group's future strategy and priorities.

Anti-corruption and anti-bribery

We do not tolerate bribery and corruption. We have established policies on anti-bribery and the receiving and giving of gifts, and hospitality.

Anti-bribery awareness is part of our colleague induction process and regular refresher training is mandated.

Colleagues are encouraged to report any concerns to their manager or, if required, our confidential and independent whistleblowing service.

We aim to engender in our colleagues principles of honesty and integrity and the desire to work to the best of their ability.

We strive to act in a professional, honest and ethical manner in all our dealings with our customers, colleagues, shareholders, suppliers, and the community. Our reputation is paramount and nothing we do should detract from or compromise our standing in the market and the community.

Our independence and impartiality as a Group are fundamental. We have a Code of Ethics, which all colleagues are required to adhere to.

[See our website for more information](#)

Supply chain

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

We are fully aware of the responsibility we have toward our stakeholders 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 and securely and to treat everyone fairly and with respect.

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

[See our Supply Chain Code of Conduct for more information](#)

Being an ethical, responsible employer and supply chain partner continued...

Human rights (including anti-slavery and human trafficking)

We recognise our responsibility to uphold and protect the rights of individuals in all aspects of our operations across the world.

Through our published statement and our global policies, we make it clear that we will observe and uphold the principles contained in the Universal Declaration of Human Rights and the International Labour Organization Fundamental Conventions.

We believe that human rights belong equally to all people without distinction as to race, colour, sex, language, religion, political or other convictions, national or social origin, birth or other traits.

We support freedom of association, the abolition of forced labour and the elimination of child labour.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships.

We communicate this to all our suppliers, contractors and business partners at the outset of the relationship and regularly thereafter. Our Anti-Slavery and Human Trafficking Statement is [available to download from our website](#).

Governance and oversight

The Board recognises that robust governance and oversight are vital to maintaining a strong business, which can weather a changing business environment.

We have a dedicated and independent global governance function, which has been designed to work together to ensure seamless oversight of the control environment and management decision making.

This team is made up of:

- Group legal services
- Information security
- Data protection
- Compliance and standards
- Health and safety
- Internal audit

The global governance function reports into the Group Board, or its sub-committees, the Audit Committee and Cyber Security Committee. The primary remit of the team is to validate

compliance with the Group's policies and procedures, legislation and regulations and good practice.

Whistleblowing

We are committed to maintaining the highest standards of honesty, integrity, openness, and accountability. It recognises that colleagues, contractors, and other workers have an important role to play in achieving this goal and we expect everyone acting for or on behalf of NCC Group to maintain our high standards.

The Group will deal responsibly and professionally with any genuine concern about any wrongdoing in the workplace.

Our commitment is underpinned by our Whistleblowing Policy to:

- Encourage colleagues to raise genuine concerns about suspected wrongdoing at the earliest practical stage, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
- Provide colleagues with guidance as to how to raise those concerns
- Reassure colleagues they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

All managers are expected to operate an 'open door' policy and should therefore make themselves available, either personally or by telephone or email, to resolve issues or concerns.

In the past financial year, we published our Whistleblowing policy in six additional languages to English to represent key locations of our operations, publishing on our website.

[View our Whistleblowing Policy online](#)

Risk management

Risk is an inherent part of doing business and risk management is a fundamental part of good corporate governance.

A successful risk management process balances risk and reward and is underpinned by sound judgement of their impact and likelihood.

The Board has overall responsibility for ensuring that NCC Group has an effective risk management framework, which is aligned to our business objectives.

The Board has established a Risk Management Policy, which has established protocols, including:

- Roles and responsibilities for the risk management framework
- Risk scoring framework
- A definition of risk appetite

The integrated approach to risk management diagram on [page 66 of our FY22 Annual Report](#) summarises the Group's overall approach to risk management, which is supported by a web-based tool – the Integrated Risk Management System (IRMS).

NCC Group adopts both a 'top-down' and 'bottom-up' approach to risk, to manage risk exposure across the Group to enable the effective pursuit of strategic objectives.



FTSE4Good

FTSE4Good Index Series

FTSE Russell (the trading name of FTSE International Limited and Frank Russell Company) confirms that NCC Group plc has been independently assessed according to the FTSE4Good criteria and has satisfied the requirements to become a constituent of the FTSE4Good Index Series.

Created by the global index provider FTSE Russell, the FTSE4Good Index Series is designed to measure the performance of companies demonstrating strong Environmental, Social and Governance (ESG) practices.

The FTSE4Good indices are used by a wide variety of market participants to create and assess responsible investment funds and other products.



Giving back at NCC Group

Creating opportunity for our colleagues to give back into their local communities in many different ways.

Giving back at NCC Group....



Our global Giving Back programme is designed to enable colleagues to choose how they play their part in ensuring local communities benefit from our presence. It also enables colleagues the opportunity to share their skills and expertise to support broader societal initiatives to make the digital world safer and more secure for all.

The four elements of the programme consist of:

A giving back day

Building on our initial pilot in prior year, we extended our Giving back day across the globe – offering colleagues one day's paid leave per annum to donate time to a charity or an approved community organisation of their choice. Colleagues can do this individually or as a team exercise.

Matched giving

Our matched giving enables colleagues to request matched funding up to £500 or local equivalent once per financial year to approved non-profit organisations, increasing the impact of colleague time, donations and participation in fundraising initiatives.

Giving Back colleague resource group

Our colleague resource group brings together a global network of local representatives to share ideas and resources to become more active in their local communities.

Sponsorship initiatives

In addition to colleague-led initiatives, we are involved in several sponsorship programmes enabling us to give something back and secure a better future for all, from local sports teams kits, to investing in future cyber skills development programmes.

Where possible, we encourage colleagues to actively participate in these initiatives adding to the time we invest in supporting good causes.

“With the growing reliance on connected devices, it is increasingly important that NCC Group as a key member of the cyber security industry, encourages young people and those looking to reskill, to understand what career opportunities exist and how they can keep themselves and others safe.

“We work with several organisations to do that by providing training and awareness sessions such as a “day in the life of” as well as opportunities for work placements and internships. The students and adults who have engaged with us have had a great attitude and commitment and this has been reflected in our very popular and successful work placement initiative.”

Colin Gillingham, Director of Professional Services

Giving back at NCC Group continued...

Empowering Women to Lead Cyber Security programme

In 2021 we sponsored the autumn cohort of the Empowering Women to Lead Cyber Security programme, which was supported by ScotlandIS, the Scottish government's Digital Directorate and the Scottish Digital Academy.

A three month programme, it is designed to address the longstanding lack of women working within what is seen as Scotland's most critical and fastest growing sector. Our sponsorship enabled the programme organisers to offer this leadership development opportunity free of charge to successful applicants.

In this financial year we will sponsor the North of England cohort, with mentorship provided by our Group CIO, Rebecca Fox

Giving back through our research expertise

We have a dedicated research working group, which offers paid research time and other resources to research projects conducted in the public interest, to support security and privacy research for the greater good of society which might not otherwise have resources available to support it.

This year, our researchers focused on a deep and broad analysis of the security and privacy implications of different vaccine passport apps around the world, the important topic of racial injustice in algorithmic decision making, and mobile privacy from the perspectives of users seeking to understand private data leakage from their favourite apps, as well as the true privacy impact of mobile-device-management (MDM) apps that colleagues are often asked to use in a bring-your-own-device (BYOD) scenario.

Read more about our public interest technology research in our [2021 Research Report](#)

Supporting JINC to improve a child's future chances

In the Netherlands, we provide our expertise to JINC, a Dutch non-profit organisation that strives for a society in which a child's background doesn't determine their future and offers equal opportunities and a fair chance for all.

The partnership enables our colleagues to invest in and give something back to the local community and includes an internship, teaching the basics of programming at schools in The Hague and Rotterdam area, job interview training at schools in Delft and participation in the "Boss for a Day" event, where organisations all around the Netherlands invite children to shadow their CEO.

Developing the next generation through CyberFirst

The UK's National Cyber Security Centre (NCSC) offers summer courses for young people aged between 11 and 17 years of age.

We support the creation and delivery of relevant training material that fits within the syllabus of each level, and our colleagues get involved through virtual and face-to-face sessions with students.

Supporting universities in the UK

We sit on the Industry Advisory Boards of the University of Gloucester, Abertay University, the University of Kent and Birmingham City University, providing expertise for their related cyber courses.

At the University College of London, we are a supporting industry partner for the Centre of Doctoral Training in Data Intensive Science. We mentor PhD students every year on a group project, in addition to MSc students on their dissertations.

Colleagues can get involved in these programmes through the mentoring of students, presentations and Capture the Flag hacking events.

Sponsorship of Defcon tickets

In the United States, we sponsored two \$1,500 tickets for Black Girls Hack summer camp delegates to attend Defcon.

Uptree partnership to support diversity commitment

Uptree works closely with teachers and career advisers to connect young people with organisations before they leave school. Through our partnership we'll be able to reach and engage with over 127,000 talented and diverse students across the UK. In the past year, with pandemic restrictions lifting, we've welcomed students to our Manchester HQ for cyber events, and our colleagues are also involved in broader mentoring, volunteering and giving presentations.

SANS Cyber Diversity Academy

SANS Cyberdiversity Academy attracts looks to increase career opportunities for underrepresented communities in cyber security. Our partnership with them has seen us recruit some of our US Next Generation Talent Cohort from the organization.

CAPSLOCK

Funded by the UK Government, CAPSLOCK is an educational organisation focusing on reskilling people and setting them up for a career in cyber. As a CAPSLOCKS partner, our talent team works hand in hand with the organisation to offer applicants who pass the course a first step into a career in cyber. We have already seen huge success, having hired multiple CAPSLOCK graduates into our UK business.

The Young Digitals

The Young Digitals are a Dutch social enterprise providing young people who may have had a difficult start in life with the opportunity to gain valuable work experience. Earlier this year we partnered with them to outsource support with our marketing activity in an attempt to give everybody a equal opportunity to contribute to a safer digital society and lowering the barrier to build careers.

We regularly share stories and updates on our social media and newschannels so follow us to keep up to date with our progress in this area.

[See next page for details](#)



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