Securing progress

NCC Group plc – Sustainability report 2024

Securing progress

In an ever-changing world, sustainability is not just a goal – it's a commitment woven into every aspect of our business. Securing progress means building a future where growth, innovation and environmental stewardship thrive together. We are embedding sustainable practices to drive resilience, create value and deliver on our promises to all stakeholders.

This report highlights how sustainability underpins our decision making, strengthens our relationships and ensures that our progress is as enduring as it is impactful. Together, we are securing a future that works for everyone.

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Creating a more secure digital future

NCC Group is made up of two distinct businesses – Cyber Security and our software escrow business, Escode – both working with the world's leading companies and governments, operating across multiple sectors, geographies and technologies.

The trend of technological change within increasingly complex, connected ecosystems means cyber threats continue to evolve and grow at pace, as does the risk of disruption posed by failure in the supply chain.

We bring decades of experience and expertise to help our clients be proactive in their resilience and counteract threats, manage disruption as usual and comply and prepare for the ever-expanding regulations relevant to their business.

We are driven by a collective purpose – working together to help create a more secure digital future.

Read more about our Cyber Security business on **page 2 of our Annual Report and Accounts 2024** or visit **https://www.nccgroup.com**

Read more about our Escode business on **page 2 of our Annual Report and Accounts 2024** or visit **https://www.escode.com**

Where we operate

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

We have a significant market presence in the UK, Europe and North America, and a growing footprint in Asia Pacific, with offices in Australia, Singapore and the Philippines.

Securing progress: embedding sustainability in everything we do

At NCC Group, sustainability isn't an add-on – it's at the heart of who we are and what we do. It's embedded in our Code of Ethics and integral to our operations. For our clients, colleagues, shareholders and the communities where we work, sustainability drives our actions every day.

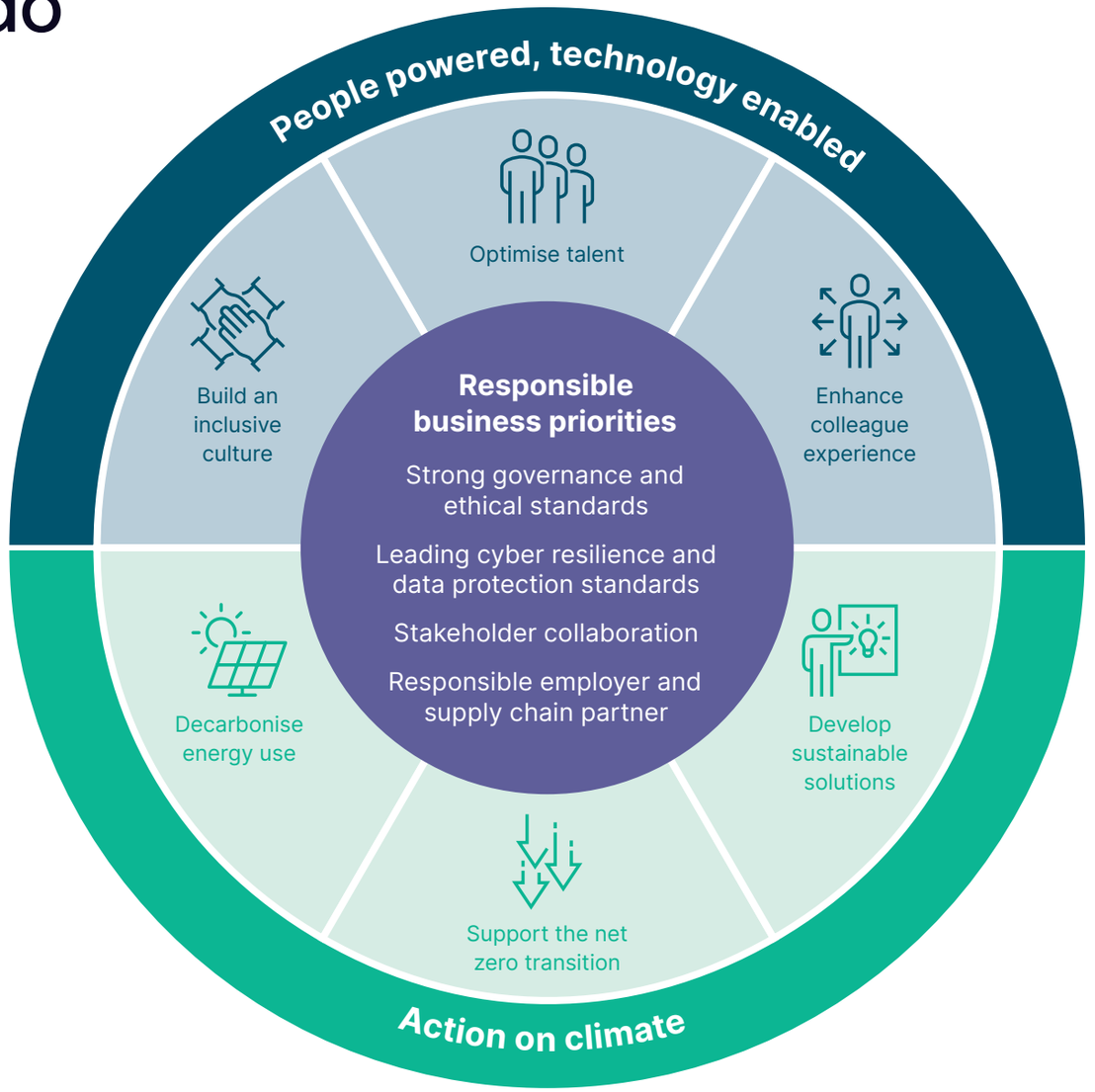
In today's rapidly evolving digital world, sustainability is more than environmental responsibility – it's about ensuring resilience and security in systems that underpin modern life. We help our clients meet governance requirements and develop technologies that address climate change and advance the UN Sustainable Development Goals. From smart homes to power grids, our work safeguards critical infrastructure against the growing risk landscape, ensuring it remains resilient, secure and reliable for generations to come.

Our role goes beyond protecting against cyber threats. We work with policymakers to advocate for stronger legislation and share our expertise to build a safer digital ecosystem. At the same time, we're mindful of our broader impact on the environment and society, ensuring our people, supply chains and operations align with a framework that prioritises both people and the planet.

In 2023 we commissioned an independent double materiality assessment to help us understand the impact our business has against 26 topics covering environment, social and governance factors.

The assessment process sought to correlate stakeholder insights with industry research, risk opportunity and impact analysis. Stakeholder insights came from interviews with investors, clients and NCC Group Board members, as well as a comprehensive colleague survey. The insights were then converted into quantitative scores where possible.

This informed our sustainability framework, which is the foundation of our strategy and priority development areas.



People powered, technology enabled

We can only lead with our purpose through our greatest asset, the exceptional people we employ. They are at the forefront of our industry, developing solutions that protect our clients and society from the growing threat of cyber crime.

Action on climate

Taking urgent action to combat climate change and its impacts supports our purpose. Decarbonising our business and embedding climate considerations into our commercial offering are crucial elements in our support for the net zero transition.

Responsible business

Our desire to improve the world we live in is encapsulated in our purpose. Embedding responsible business into our everyday activities is central to achieving this aim.

> "Sustainability is at the heart of who we are and what we do, embedded in our Code of Ethics, and integral to our operations."

Yvonne Harley
Director of Investor Relations and Sustainability

Working in collaboration to secure progress

As a global business, we have many external stakeholders, which are not limited to the countries we are based in. Stakeholder engagement and feedback is a key component of our sustainability decision-making process to ensure the Board understands impacts, risks and opportunities. Board-level sponsorship is through the Chair of the Audit Committee and Non-Executive Director, Lynn Fordham, which provides further assurance that stakeholder feedback is considered in decision making.

Colleague engagement is led by the people team, supported by the internal communications team. The focus for the past financial year has been around our people proposition, with some significant developments in supporting colleagues around key life stages.

You can read more about these on **pages 7 to 12**

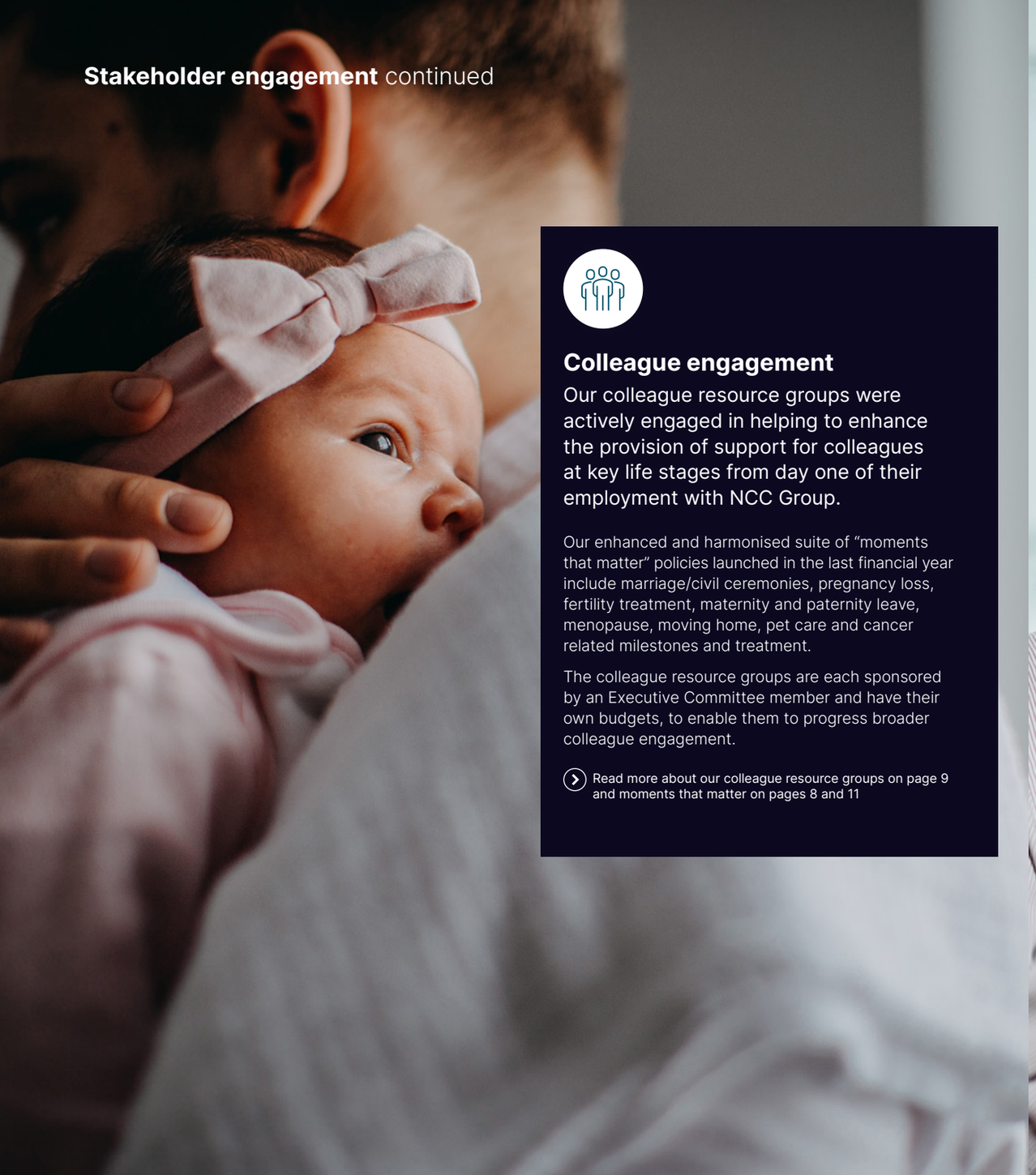
Client engagement is the responsibility of the whole organisation, led by our sales and delivery teams. The sales and delivery team is supported to do this by functional experts in the business – from Compliance and Finance, to Procurement and Sustainability for example. Everyone at NCC Group works together in service of clients with the aim to be a responsible supply chain partner. A good example of this client focus is our ambition to report voluntarily against the new European Sustainability Reporting Standards, to support our European clients' reporting requirements.

See **pages 18 and 19** for our voluntary disclosures against the standards

Investor and financial analyst engagement is led by the Director of Investor Relations and Sustainability, Chief Financial Officer and Chief Executive Officer. We take a proactive approach, ensuring that our investment case is understood by scheduling regular roadshows around results, as well as capital market events.

Supplier engagement on sustainability is currently limited to on-boarding through our Supply Chain Code of Conduct; however, this presents us with an opportunity to enhance engagement. We'll lead on this with climate change in the next financial year as part of our planned developments in this area.

See **page 19** for more information on our plans



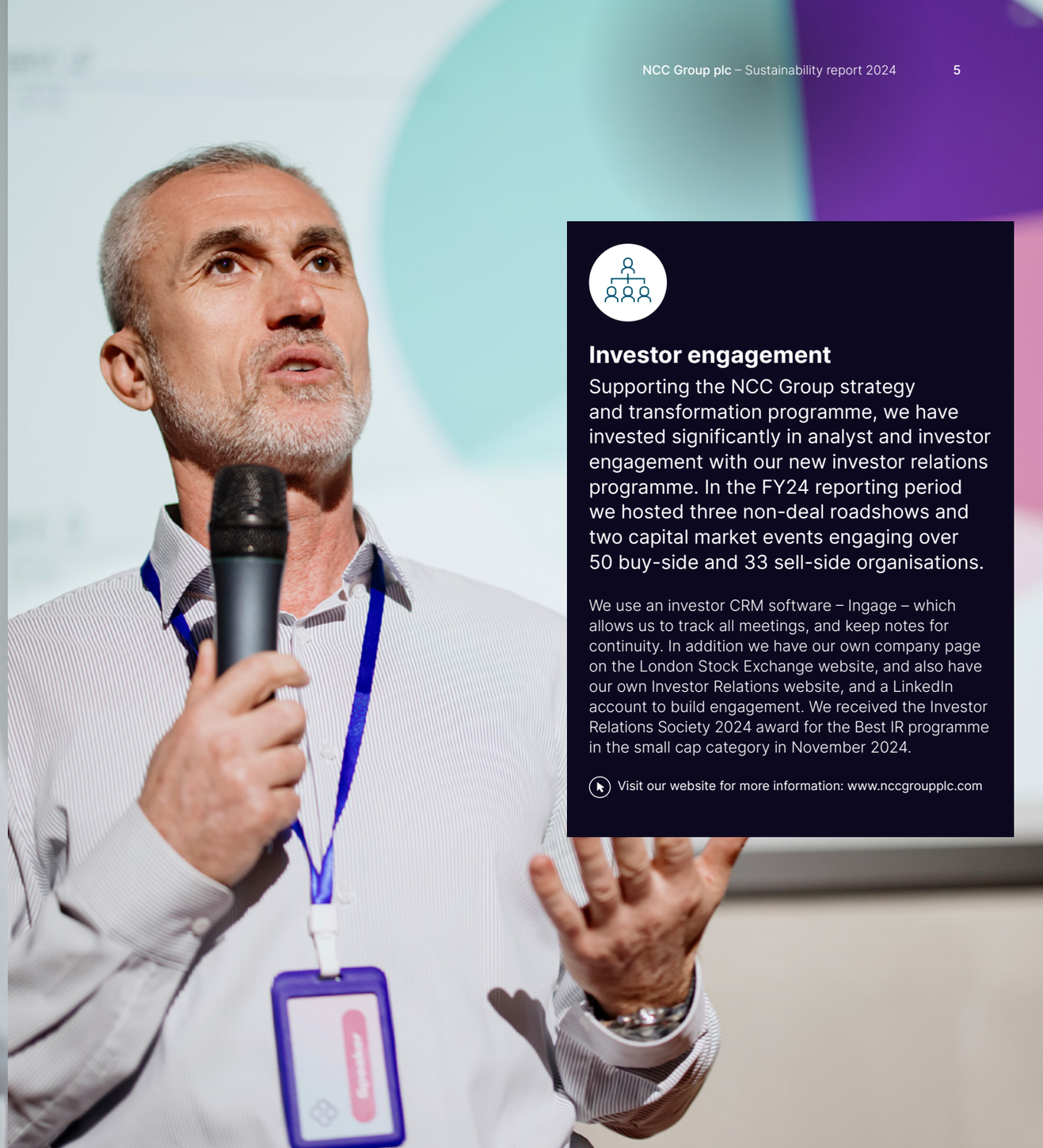
Colleague engagement

Our colleague resource groups were actively engaged in helping to enhance the provision of support for colleagues at key life stages from day one of their employment with NCC Group.

Our enhanced and harmonised suite of "moments that matter" policies launched in the last financial year include marriage/civil ceremonies, pregnancy loss, fertility treatment, maternity and paternity leave, menopause, moving home, pet care and cancer related milestones and treatment.

The colleague resource groups are each sponsored by an Executive Committee member and have their own budgets, to enable them to progress broader colleague engagement.

Read more about our colleague resource groups on page 9 and moments that matter on pages 8 and 11



Investor engagement

Supporting the NCC Group strategy and transformation programme, we have invested significantly in analyst and investor engagement with our new investor relations programme. In the FY24 reporting period we hosted three non-deal roadshows and two capital market events engaging over 50 buy-side and 33 sell-side organisations.

We use an investor CRM software – Ingage – which allows us to track all meetings, and keep notes for continuity. In addition we have our own company page on the London Stock Exchange website, and also have our own Investor Relations website, and a LinkedIn account to build engagement. We received the Investor Relations Society 2024 award for the Best IR programme in the small cap category in November 2024.

Visit our website for more information: www.nccgroupplc.com

Measuring our performance

Due to the continued transformation of our business, we have not yet settled on sustainability targets. However, we have continued to build the foundations required to do this, including enhancing our climate reporting and conducting a gap analysis against current reporting requirements and the new European Sustainable Reporting Standards.

As a result these highlights reflect and demonstrate the progress we have made to establish credible targets going forward:

People powered, technology enabled

We can only lead with our purpose through our greatest asset, the exceptional people we employ. They are at the forefront of our industry, developing solutions that protect our clients and society from the growing threat of cyber crime.

This includes our core objectives: to build an inclusive culture, optimise talent and enhance the colleague experience.

- Launched our new and harmonised global family-friendly policies, offering enhanced leave programmes from day one of a colleague's experience with NCC Group.
- Undertook our first inclusion survey in collaboration with colleague resource groups with a 49% response rate, helping to shape our future agenda.
- Over 100 managers attended a live training event on the importance of colleague wellbeing, removing any potential stigma associated with mental illness. A recording of the event has been placed in our library for those unable to attend live and as a future resource for new managers.

Find out more about our activities on **pages 7 to 12**

Action on climate

Taking urgent action to combat climate change and its impacts supports our purpose. Decarbonising our business and embedding climate considerations into our commercial offering are crucial elements in our support for the net zero transition.

This includes our core objectives: to decarbonise energy use, develop sustainable solutions and support the net zero transition.

- Reduced our global office footprint by 40% in the 16 months to 30 September 2024.
- Appointed a new travel provider to improve reporting on emissions, seek lower carbon options and improve health, safety and wellbeing of colleagues.
- Extended Scope 3 emission reporting to included purchased goods and services and employee commuting.

Find out more about our activities on **pages 13 to 16**

Responsible business

Our desire to improve the world we live in is encapsulated in our purpose. Embedding responsible business into our everyday activities is central to achieving this aim.

This includes our core objectives: to maintain strong governance and high ethical standards, protect our stakeholders with leading cyber resilience and data protection standards and be a responsible employer and supply chain partner.

- Global re-certification against ISO 9001:2015 and ISO 27001:2013 standards.
- Successful transition to the new ISO 27001:2022 Information Security Standard ahead of the October 2025 deadline.

Find out more about our activities on **pages 17 to 19**

People powered, technology enabled

Our people commitment

At NCC Group, we are dedicated to fostering an inclusive culture, optimising talent for a secure digital future and enhancing the colleague experience. Our focus on inclusion and diversity ensures that every colleague feels safe and valued, contributing to a more innovative and collaborative environment. We are committed to continuous learning and talent development, equipping our teams with the skills needed to tackle evolving cyber threats. By prioritising colleague wellbeing and engagement, we create a supportive workplace that drives both personal and professional growth. Our progress in these areas underscores our commitment to being a leading employer and a trusted partner in the technology sector.

Read more on **pages 8 to 12**

Progress highlights

- Launched new and harmonised global family-friendly policies in autumn 2024, including enhanced leave programmes for various life events.
- Conducted the first inclusion survey in 2024 with a 49% response rate, shaping future agendas based on colleague feedback.
- Opened a new office in Manila, the Philippines, with extensive training and development support from colleagues worldwide.
- Introduced a new leadership development programme, engaging over 60 senior leaders globally.
- Invested in a new Learning Experience Platform to enhance learning and development opportunities.
- Supported colleagues during extreme weather events in the Philippines, the US and Spain in 2024.
- Improved engagement score by 13 points from 2023 through regular surveys and feedback mechanisms.

Find out more about our activities on **pages 8 to 12**

Link to material topics

Inclusion and diversity

Read more on **pages 8 and 9**

Professional development

Read more on **page 10**

Colleague health and wellbeing

Read more on **pages 11 and 12**

Colleague engagement

Read more on **pages 8 to 12**

1. Building an inclusive culture

An inclusive culture enhances team creativity and innovation, directly improving the value we offer to our clients by offering a broader range of perspectives, tailored solutions and stronger partnerships.

What an inclusive culture means to NCC Group

We aim to create an environment where all colleagues feel psychologically, emotionally and physically safe to be authentic and representative of the diversity of the world they live in, to share their personal experiences and to have equal opportunity to achieve. This brings to life our values – working together, being brilliantly creative, embracing difference and taking responsibility – all of which are essential elements in driving forward our technological advancements and maintaining a competitive edge in the market.

Read more on our approach to inclusion and diversity in our Annual Report and Accounts 2024 on **page 18**

Follow the story online

> We recognise and take responsibility for the role we can play in improving diversity across the whole of the technology sector."

Our approach to inclusion and diversity

We recognise and take responsibility for the role we can play in improving diversity across the whole of the technology sector. Inclusion and diversity principles are embedded into our hiring and talent management process, partnering with external organisations to ensure we are accessible to a more diverse candidate base. Unconscious bias training is part of our standard training offer and our colleague resource groups play an important role providing input to ways of working, engaging and educating colleagues and creating a voice for underrepresented communities across our global business.

Our progress

We continue to make progress in building a more inclusive workplace and at the heart of this is creating policies that help and support colleagues at moments that matter throughout their lives.

An example of this was in autumn 2024, which saw us launch our new and harmonised global family-friendly policies. This aligns with our ambition to be a leading family-friendly employer and offer enhanced leave programmes from day one of a colleague's experience with NCC Group. This suite of "moments that matter" policies include marriage/civil ceremonies, pregnancy loss, fertility treatment, maternity and paternity leave, menopause, moving home, pet care and cancer related milestones and treatment.

Also in 2024, we undertook our first inclusion survey in collaboration with the colleague resource groups, to get input from colleagues on what matters, helping to shape our future agenda. We had a 49% response rate and the colleague resource groups will work with HR to prioritise and take forward actions.

Our future and ambition

We will continue to seek partnerships and alliances with external partners where it aligns with our values and strategic priorities to strengthen our diversity initiatives beyond the NCC Group community.

Age and sex diversity statistics as at 31 December 2024

	20 and under	21–30	31–40	41–50	51–60	61–64	65+	Total
Female	1	147	237	123	61	8	1	578
Male	12	421	530	345	177	26	13	1,524
Undisclosed	70	19	19	4	—	2	—	114
Total	**83**	**587**	**786**	**472**	**238**	**36**	**14**	**2,216**

The data is one source of information that helps us to understand what might be important to colleagues, and this, alongside input from colleague resource groups and broader engagement feedback sources, has led to the development of our colleague proposition – see page 9 for more information.

Amplifying our colleague resource groups

Our colleague resource groups play a vital role in fostering an inclusive workplace by amplifying diverse voices and perspectives. They create a platform for underrepresented groups to share their experiences, ensuring their voices are heard in decision-making processes, and provide shared communities of support. By improving listening and engagement, the groups can help shape policies and initiatives that reflect the needs of all colleagues, driving a more equitable and innovative company culture.

Core groups include LGBTQIA+, Race and Ethnicity, Gender, Accessibility and Neurodiversity. New groups established in 2024 include the Parents Network and the MenoPause and Connect community. Executive leaders sponsor core networks, and members of the Board also join events and are avid supporters.

Improving wellbeing for all colleagues

Over the past year, the Accessibility and Wellbeing groups came together to host a global webinar looking at mental health in cyber, and were instrumental in leading on more investment in mental health training for colleagues and managers. The groups are actively involved in providing input to our estates provisions, ensuring that are working spaces are best in class and accessible for all.

> “Mental health is a thread that runs through our Accessibility colleague resource group agenda, and during 2025 we will be continuing to focus on this.”

MenoPause and Connect

A newer resource group, the MenoPause and Connect community provides essential support services for colleagues personally preparing for and going through menopause.

In 2024, it supported HR in producing a global menopause Policy and training for line managers and building out the existing Menopause Library to include menstruation support.

NCC Group is a member of the Menopause and Menstruation Friendly Workplace organisation, and actively working towards accreditation – a target for 2025.

LGBTQIA+

The LGBTQIA+ resource group made incredible strides during 2024, supporting colleagues, advocating for inclusivity and celebrating our vibrant global team. In 2024 we marked our first march in Manchester Pride, where we celebrated our community and acknowledged the reality that not all LGBTQIA+ individuals experience safety or opportunity.

At NCC Group, we strive to be a place where everyone can thrive authentically. Our events for Pride Month offered insightful talks and activities, fostering awareness and reinforcing that everyone is welcome, valued, and celebrated here.

> “We’re eager to build on this momentum in FY25 and continue championing inclusion at every level.”

2. Optimise talent for a secure digital future

With ever-advancing technologies, and the subsequent developing threats, it's crucial that we invest in future skills through a culture of continuous learning to meet those challenges head-on and help our clients to secure their digital assets.

What it means to NCC Group

We are a diverse, global community of talented and creative individuals, working together and united by the same goal – to help create a more secure digital future.

We harness our collective insight, intelligence and innovation to power end-to-end cyber services that protect our clients from cyber threat. These are core elements of our DNA, which began back in the 1990s and give us our position in the market that no one else can match – all achieved through our investment in the critical skills to deliver for our clients.

Read more on our talent development in our Annual Report and Accounts 2024 on **page 18**

Follow the story online

"Diverse skills are vital for innovation, and innovative thinking helps us tackle complex challenges with unique client solutions."

Our approach to talent development

We create a culture of learning at NCC Group, which, depending on the role, will typically be a combination of on the job learning through line management support and skills-based mentoring, self-learning where colleagues have access to resources, and formal training – for example, supporting colleagues in gaining certifications relevant to their role and client requirements as well as personal development.

It's critical that we are agile in adapting to new challenges and continuous assessment of necessary skills drives our talent development and attraction plans.

Our progress

Our embedded performance management process plays an important role in supporting colleagues' personal development opportunities, while providing role purpose and clarity.

Career paths guide options for colleagues and 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.

Our new office in Manila, the Philippines, is a great example of our approach to talent development. Colleagues from other countries were actively involved in training new hires through secondments – not just in technical delivery for clients, but also in growing the full service offering – from procurement, HR and finance, for example.

In the last financial year, sponsored by our CEO, we launched our new leadership development programme. Over 60 senior leaders from across our global business undertook the two day workshop, with additional coaching support sessions as a follow-up. The aim is to create a common language for leadership at NCC Group, and this builds on our existing Managing Essentials courses for managers.

Our future and ambition

We have invested in a new Learning Experience Platform, which will be embedded in this current financial year (ending 30 September 2025). This will provide an enhanced learning experience for colleagues as well as support our management development programme through formal personal development plans. It will also enable us to measure and report on the training investment we make across our global teams.

By investing in our people, we position ourselves as a market leader in Cyber Security, delivering effective solutions for our clients. We look forward, using our insight, innovation and intelligence to meet the most complex of Cyber Security challenges head on.

We will continue to contribute to the broader challenge, beyond individual client challenges, by engaging and collaborating with regulatory bodies, governments and industry organisations, participating and leading in discussions on Cyber Security policy and raising awareness of cyber threats.

3. Enhance the colleague experience

Creating an exceptional colleague experience is the key to unlocking future business success. We are a people-based, technology-enabled business – it's our talented colleagues who design, deliver and manage the service delivery that keeps our clients' digital assets safe and secure.

Why colleague experience matters

For our business, a great colleague experience will help us attract and retain top talent. When colleagues feel empowered and psychologically safe, they are more likely to innovate and contribute to a more positive client experience. By creating the right environment we provide a platform for their personal and professional growth, which directly contributes to NCC Group's growth and adaptability in what is an ever-evolving marketplace.

> Colleagues are at the heart of our growth, innovation and exceptional client service. We are committed to creating a culture of mutual respect, nurturing both our collective goals and their individual aspirations."

Our progress

Our globally, HR-led programme ensures colleagues have access to support at all points in their careers. To help us further develop our people proposition, we have designed three pillars to focus activities aligned with colleague feedback and global best practice:

Health | **Family** | **Flexibility**

Transitioning our activities is ongoing; however, some early work has seen us launch new policies and harmonise benefits that support our colleagues at key life stages.

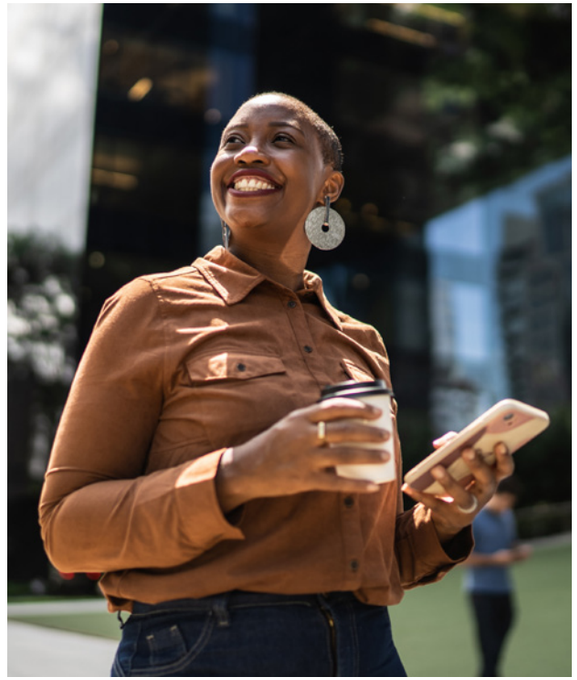
Our ambition is to be a leading family-friendly employer and offer enhanced leave programmes from day one of a colleague's experience with NCC Group. This suite of "moments that matter" policies include marriage/civil ceremonies, pregnancy loss, fertility treatment, maternity and paternity leave, menopause, moving home, pet care and cancer related milestones and treatment.

We are focused on preventative health and early diagnostics, and a sample of activities in the past year includes:

- Training to understand what burnout is and how to avoid it, specifically aimed at individuals working in high pressure environments.
- Male mental health – understanding specific challenges to asking for help and taking steps to look after your own health and wellbeing.
- Launching our MenoPause and Connect community supported by a new global Menopause Policy, line manager training and support tools for colleagues.

Managers in the UK and APAC regions joined training with our Employee Assistance Programme provider on mental health, with the aim of reinforcing the importance of colleague wellbeing and removing stigma associated with mental illness.

Another important element of our work is to provide support to colleagues and their families who are impacted by local disaster. Support is tailored to the needs of colleagues, helping them to get back on their feet, but our approach to flexibility also ensures they focus on their personal safety and wellbeing as a priority and know they are supported by their colleagues. During 2024, we supported colleagues in the Philippines, the US and Spain during extreme weather related events.



Our future and ambition

In addition to building out our three pillars – health, family and flexibility – we continue to listen to feedback from colleagues to help shape our future colleague experience. Our colleague resource groups play an important role in this and with executive sponsorship and resources they are building their programmes to best serve the communities they represent. Read more about our resource groups on page 9.

Case study

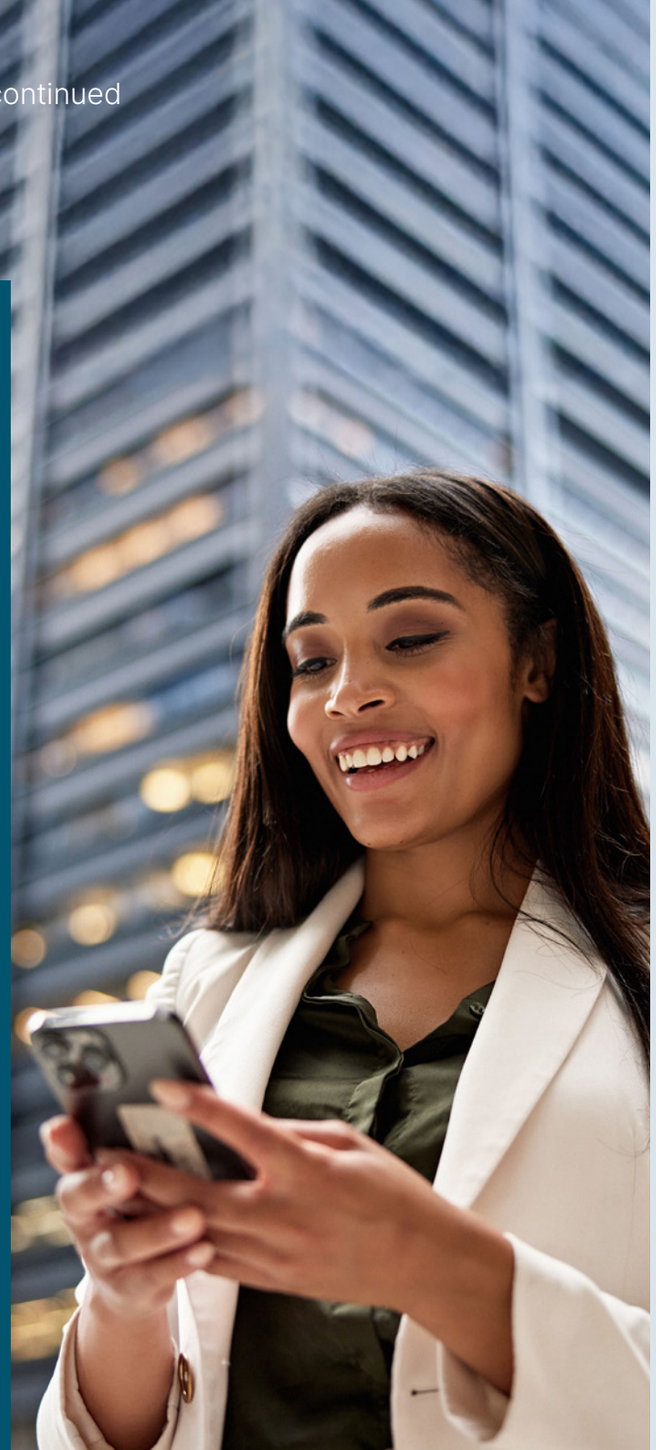
Measuring progress and driving action

We have a number of mechanisms to measure colleague engagement, which include our engagement survey using the Glint platform. On average, 1,456 colleagues responded to the three surveys run, with an improved engagement score of 13 points from 2023 (period was 1 June 2023 to 30 September 2024 – a 16 month period due to a change in financial year end).

Actions from the surveys are driven locally, with recommendations at a global level led by the Executive Committee and fed into relevant decision-making processes.

In addition to the survey, Senior Non-Executive Director Julie Chakraverty hosts monthly colleague sessions to ensure the Board is listening to the voice of colleagues and decision making takes into account their interests. In the past financial year, over 80 colleagues met with Julie, who reported feedback to the Board each month.

> “We focused our efforts on general stress and mental health awareness.”



Investing in our mental wellbeing

SUPPORTING OUR EMPLOYEES

We have focused our efforts on general stress and mental health awareness, equipping our people managers with the skills and resources to navigate complex situations within their teams, and campaigns to spread awareness of the resources available to colleagues globally and regionally. Additional efforts have focused on growing our global Mental Health First Aid network to provide enhanced time zone coverage and first language support.

Examples of the associated initiatives in 2024 include:

- Mental Health Training for Line Managers (UK) June 2024 – focused on supporting team members, navigating conversations and real-world scenarios around mental health, and signposting to appropriate resources, as available.
- Mental Health Training for Line Managers (APAC region) November 2024 – similar content to the June session, with specific references to resources available in our Philippines, Singapore and Australia locations.
- Mental Health in Cyber Security Workshop (global) October 2024 – focused on identifying symptoms of stress and burnout, specifics related to the cyber security industry, as well as strategies to support positive mental health.
- Personal Resilience Workshop (global) November 2024 – a session centred around identifying strategies to support resilience in the face of challenges and protecting mental health.
- Men’s Mental Health Panel Discussion (global) December 2024 – an internal panel discussing barriers and solutions surrounding men’s mental health as part of the Movember campaign and Men’s Mental Health Awareness Month programming.

In addition, we continue to review global and regional offerings, including Employee Assistance Programmes and potential supplemental technologies supporting mental health for future use.

Action on climate

We are committed to supporting the transition to net zero emissions, which encompasses three key areas: reducing our carbon footprint, decarbonising our energy use and developing sustainable solutions.

Read more on **pages 14 to 16**

Focus and progress

1. **Reducing our carbon footprint:** we measure and manage our Scope 1, Scope 2 and Scope 3 emissions, aligning our efforts with regulatory and client requirements. Our enhanced Scope 3 reporting now includes spend-based purchased goods and services, and employee commuting. Partnering with Positive Planet, we have begun work on mapping our net zero journey and setting credible reduction targets.
2. **Decarbonising our energy use:** we have reduced our active office space by 40% in 2024 and implemented a new Travel Policy to minimise emissions from business related travel.
3. **Developing sustainable solutions:** our commitment to sustainability drives innovation in our Cyber Security and software escrow solutions. By leveraging our insight, innovation and intelligence, we help clients achieve their sustainability objectives while securing the digitally connected world.

Our journey towards sustainability is ongoing, and we are committed to making continuous progress in these areas to protect our future and support our clients and colleagues and the local communities we operate within.

Link to material topics

Supporting the net zero transition

Read more on **page 14**

Decarbonising our energy usage

Read more on **page 15**

Develop sustainable solutions

Read more on **page 16**

1. Support the net zero transition

As a business we have a responsibility to reduce our carbon emissions. This involves measuring all applicable Scope 1, Scope 2 and Scope 3 emissions, understanding them in the context of our business operations, and taking credible steps towards achieving net zero emissions aligned with regulatory requirements.

Why this matters to NCC Group

It's critical that we protect our future business from emerging risks associated with climate change and comply with current and emerging environmental regulations. This will enable us to be a responsible supply chain partner, focusing our efforts on support our clients with the Cyber Security challenges. As an employer, we know and understand the importance of net zero transition to our current and future colleagues, and the communities we exist within.

Read more on our net zero transition in our Annual Report and Accounts 2024 on **page 23**

Follow the story online

"It's critical that we remain flexible in our approach but focused on taking responsibility for the emissions we generate and seek to reduce what we can control."

Yvonne Harley
Director of Investor Relations and Sustainability

Our approach

This is a journey, it's not a race. Tackling climate change is not something we can do alone, we need to partner with experts and work collaboratively with our clients and our supply chain partners to continually make progress towards the net zero emissions ambition.

Our progress

In the past financial year we enhanced our Scope 3 emissions reporting by adding spend-based purchased goods and services, and employee commuting.

With enhanced measurement we saw an increase in our reported emissions. We also changed our financial year end and have transformed our operating model, with the opening of a new office in Manila, so we have reset our benchmark from which to develop our carbon reduction plan and set net zero targets. To support us on this journey we have appointed Positive Planet to support us on our carbon reduction plan, which will include setting credible reduction targets. This ends our partnership with Planet Mark, and we'd like to thank the team for its support on our journey so far.

Our future and ambition

The work with Positive Planet will be ongoing through 2025 with the aim to publish our plan as part of our full-year reporting cycle. Validation of our benchmark data will allow for analysis to understand our emissions, pinpoint carbon hotspots and identify areas to prioritise for reduction initiatives. It will also highlight data quality and opportunities for improvement.

We'll then move to creating our carbon reduction plan (or net zero strategy); this will be a collaborative approach, which will include members of our new climate change working group working with Positive Planet.

Our ambition is to set short, medium and long-term reduction targets, while taking into account NCC Group's growth strategy and future operating model, which may impact our carbon footprint in future years.

Our current Streamlined Energy and Carbon Report is available to view on page 28 of our 2024 Annual Report and Accounts, or via our website here: www.nccgroupplc.com/media/g10kadgl/ncc-group-secr-report-ye_2024.pdf

2. Decarbonising our energy use

As a global Cyber Security and software resilience business, decarbonisation means we need to transition our energy consumption towards cleaner, renewable sources where we can, while optimising how we operate to reduce our overall carbon footprint.

Why this matters to NCC Group

While we are considered a low carbon business, the biggest impact occurs in our business travel, both for client and non-client related travel, and our leased office spaces. For this reason, this is the focus of our reporting.

Read more on our energy use in our Annual Report and Accounts 2024 on **page 20**

Follow the story online

Our progress

For the reporting period 1 October 2023 to 30 September 2024 our total annual Scope 1 and Scope 2 emissions were 1,686.8 tCO_2e. This was an increase of 41% due to the increased data we are now able to collect.

Leased buildings

We continue to proactively review our leased office space requirements, considering client and colleague needs. For any new leases, considerations are given to collaboration, health, safety and security, personal wellbeing and the impact emissions have on the local environment. We also take into account commuting options for colleagues and the accessibility of reliable and safe public transport networks.

During 2024 we closed ten offices. While some will still require rent to be paid due to lease requirements, they are now closed from an emissions reporting perspective.

Our square footage of leased buildings in operations is now c.50,000 square feet, a 40% reduction of active office space. The benefits of GHG emission reductions will flow through in the next reporting period, although this is not guaranteed as new office spaces might be required depending on business needs.

Our office usage is reviewed monthly as part of the executive team operations review, which, alongside colleague feedback and engagement, and consideration of client needs, informs the real estate agency.

Travel

A new travel provider was appointed in 2024 to improve how we manage client and non-client related travel. This will provide us with improved emissions reporting, and importantly inform how we respond and support colleagues in response to any social or climate-related issues that might arise.

Our new Travel Policy and procedures, which launched in 2024, have provided improved management oversight of non-client related travel. The focus was on improving the health, safety and wellbeing of colleagues, while continuing to consciously consider our impact on the local communities in which we are located, and our broader commitment to reducing GHG emissions.

Domestic flights within the UK and European countries are by exception only, with rail travel the preferred option. As a result, any train journey more than three hours in duration in total is travelled by first-class to ensure the health, safety and wellbeing of colleagues.

Our future and ambition

We will continue with our current focus, and look forward to identifying further opportunities and setting targets as part of creating our carbon reduction plan working in partnership with Positive Planet.

We are adding carbon literacy to our mandatory on-boarding and annual compliance training programme from this year. This will include collecting commuting data from every colleague to underpin our commitment to quality of measurement of data. We are exploring options on this training content with Positive Planet as part of our overall planning.

3. Develop sustainable solutions

Developing sustainable solutions goes beyond environmental conservation, economic stability and social equity for a business like NCC Group. Cyber Security and software escrow enable the future technology solutions that advance sustainable development. Understanding the evolving threat and implementing good governance and controls is essential to unlocking the sustainable solutions and keeping the digitally connected world safer and more secure.

Read more on our sustainable solutions in our Annual Report and Accounts 2024 on **page 24**

Follow the story online

"In 2024, we witnessed another record-breaking year for extreme weather, underscoring the urgent need to address climate change. The impact on communities has been devastating, highlighting the necessity for both policy changes and a broader commitment to sustainability.

Reducing our carbon footprint and power consumption while advancing our digital goals is crucial. The carbon costs of AI are becoming more apparent, driving us to make AI more efficient and less power-hungry. This involves using renewable and cost effective energy sources."

Sian John
Chief Technology Officer

It's in our DNA

Our distinct edge – insight, innovation and intelligence

Embedded in our very DNA are three key pillars – insight, innovation and intelligence. This uniquely positions us in the market, ensuring that our designs and solutions are enduring and empower our clients to achieve their sustainability objectives.

Insight: our global footprint spans thousands of clients across diverse sectors. By working closely with them and policymakers, industry think tanks and governments, we gain first-hand knowledge of the immediate challenges and emerging pressures. This equips us with a profound understanding of current dynamics and potential future trends. We incorporate this rich insight into every client interaction, ensuring tailored and timely solutions.

Innovation: our commitment to innovation is propelled by a twofold approach: the pressing issues our clients encounter and the unwavering passion of our expert team. We have a deep understanding of the risks our clients face and how security measures affect them. By doing so, we architect solutions that don't just safeguard – they also foster growth, positioning Cyber Security as a value driver rather than a deterrent for our clients.

Intelligence: building upon this insight, our intelligence experts are second to none. With real-time visibility into the cyber landscape, we discern emerging threats and identify targeted vulnerabilities. Who are our adversaries? What strategies do they employ? What's their potential impact? By answering these questions, we ensure that our guidance hones in on the most pertinent risks, specific to the sector needs and operating environment of our clients.

Our progress

We are transforming our business to be focused on developing and delivering Cyber Security and software escrow solutions that are adaptable to emerging technologies and ever-evolving threat landscape.

Our future ambition

Embracing sustainability in our solutions inspires innovation. By challenging conventional design methodologies, we aim to reduce our impact on the environment and deliver unparalleled value to our clients who are at the forefront of developing solutions that will protect the climate. In doing so, we look to secure sustainable practices but also ensure we build sustainable Cyber Security solutions.

To view our latest work and developments visit our Resource Hub at: www.nccgroup.com/uk/resource-hub, which includes research, insights and updates from across our global business of experts

Responsible business

Responsible business lies at the heart of our sustainability strategy – it is our licence to operate. Grounded in our values, we're guided by our Code of Ethics and driven by our purpose to make the digital world safer and more secure. We embed responsible practices into our everyday operations and set a high benchmark in corporate leadership, ensuring our actions resonate positively across global operations in the work we do for our clients.

Read more on **pages 18 and 19**

As experts in information security and risk mitigation, we understand the responsibility to promote best practice within our own business. We have dedicated teams to support our global business to exceed industry best practice and hold several internally recognised certifications and accreditations to support our service delivery and overall business processes:

- ISO 27001:2022 and ISO 9001:2015 – the list of locations these are applicable to can be found on our website. All entities within the Group are aligned to the same policies, processes and controls as those within the scope of ISO 27001:2022 and ISO 9001:2015 and we are expanding the scope through a phased rollout schedule.
- Cyber Essentials Plus – a UK government backed scheme, which helps organisations to protect their IT infrastructure against most common cyber-attacks.

Service related certifications, accreditations and memberships

- (UK) NCSC Check – we are listed as a green service provider, the highest attainable standard, having held this since 2001.
- ISO 17025:2017 – our NCC Group Security Services Limited entity is certified to this international standard for performing laboratory activities and testing.
- PCI Approved Scan Vendors and PCI Qualified Security Assessor.
- (UK) NCSC Cyber Incident Response – both a Level 1 and Level 2 provider.
- CREST (Council of Registered Ethical Security Testers).
- TISAX (Trusted Information Security Assessment Exchange) accredited and awarded a security label to perform automotive security assessments for the German car manufacturing industry.
- FedRAMP – Recognised Third Party Assessment Organization (3PAO) able to offer consultancy and support for clients to become FedRAMP certified.

We undertake internal and external audits to measure compliance with internal controls across service delivery, internal IT, financial management, data protection and risk management. Additionally, we are regularly audited by clients to provide assurance and to support their own supply chain and vendor management programmes. Our internal audit function is embedded into our global governance function and split into two key areas:

- Financial and operational: focused on auditing of all processes related to the integrity of our financial and accounting records and reporting.
- Global standards and support: focused on auditing adherence to the policies, processes and procedures, which support our ISO 27001:2022, ISO 9001:2015 and ISO 17025:2017 certifications.

We are externally audited by LRQA, the accreditation body for our ISO 27001:2022 and ISO 9001:2015 certifications. These surveillance audits assess the effectiveness of our ISO-certified management systems and conducted on a six month cycle.

Our NCC Group Security Services Limited entity is externally audited by the United Kingdom Accreditation Service (UKAS), the accreditation body for ISO 17025:2017. These surveillance audits assess the effectiveness of ISO 17025:2017-certified management system on an annual cycle.

Our IT infrastructure is externally assessed by Perspective Risk Ltd on an annual basis to maintain our Cyber Essentials Plus certification.

View our accreditations and certifications online at www.nccgroupplc.com/sustainability/responsible-business/governance-and-standards/

Leading cyber resilience and data protection standards

Our Cyber Security Committee focuses specifically on the cyber risks faced by the Group. This reflects the significant threat posed by cyber risks, the nature of our business and the potential damage to the business as a high value target for malicious acts.

The Committee aims to challenge and support improvements to the Group's information security and data protection policies, defences and controls. This ensures compliance with global data protection regulations around the world, as well as the Group looking after its own information, and the information that its customers entrust to it, with the proper care and attention.

Read the Cyber Security Committee's latest report in our 2024 Annual Report and Accounts on pages 77 and 78

Penetration testing and vulnerability scanning

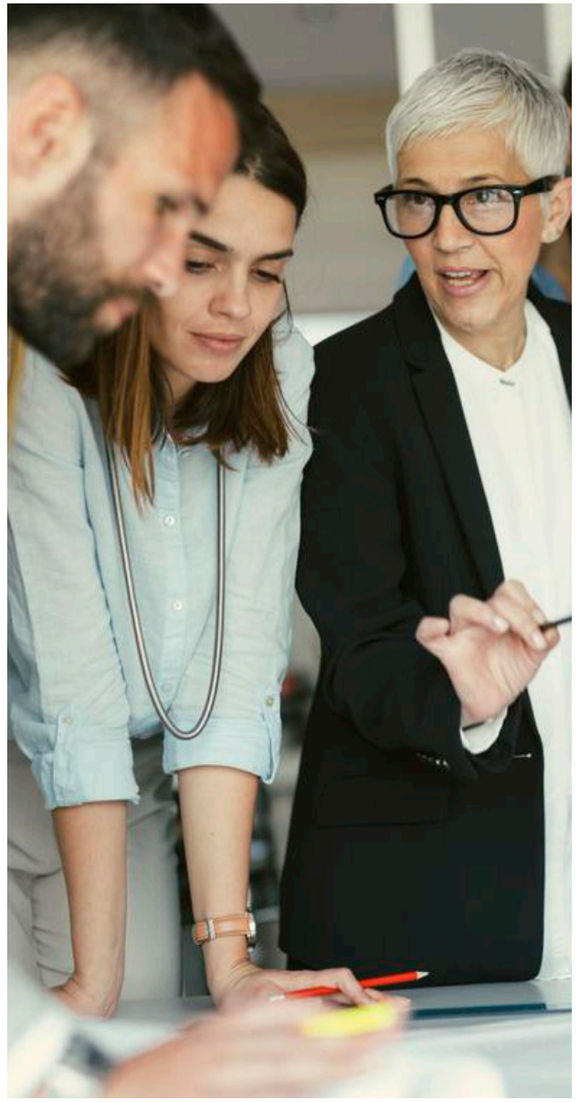
We conduct monthly external and quarterly internal vulnerability assessment scans, which, as well as looking for vulnerabilities, also test the capabilities of our software patching regime. We also conduct regular penetration tests against our systems.

Managed Detection and Response

Intruder Detection Systems/Intruder Prevention Systems (IDS/IPS) are deployed on the network perimeter analysing all inbound and outbound traffic, with rules reviewed regularly.

Our firewalls employ IPS where traffic is logged and monitored; the firewalls are configured for static analysis, which drop packets where relevant and alert the information security team. Additional layers include an array sensor positioned within the firewall analysing all decrypted traffic generating signature-based alerts, which are monitored 24/7 by our own Security Operations Centre (SOC). The alerts generated are governed by strict service-level agreements, ensuring a rapid response and triage of the incident by our own IT security team.

IPS is deployed on all endpoints in the form of anti-virus and an application control system which is managed centrally, enabling the fine-grained control across all endpoints.



Data protection

Our Data Privacy Policy forms part of a larger data protection programme of policies, processes, procedures and controls designed to meet the requirements of GDPR, the CCPA and other applicable data privacy legislation. This includes standard induction and annual refresher training, dedicated training for high risk roles and dedicated policies and procedures, which form part of our Information Security Management System.

There are dedicated procedures for identifying and reporting data breaches, responding to data subject access requests (DSAR) and conducting Data Protection Impact Assessments. We also have a series of incident and breach management processes in place that cover the identification, containment and remediation of any potential security incident or potential data breach. These also ensure that any notification requirements are identified and integrated into our processes.

An inter-group transfer agreement is in place to support our global operations. Depending on the specific client engagements we are undertaking, a statement of work may include a requirement to collaborate with other parts of the Group.

Where such collaborations involve international data transfers, we work with clients to ensure our contractual agreements meet the transfer requirements of all applicable data protection legislation.

Shareholder collaboration

We use our expertise as global cyber and software resilience experts to shape the laws, policies and regulations that will dictate the future of critical technologies and the digital world. Building on our technology heritage and our role as trusted advisors to governments and regulators, we are helping to ensure that political decisions about the shape of the future are evidence-based and reflect operational realities in the pursuit of our ambition to make the digital world more secure.

Responsible employer and supply chain partner

We recognise relationships are key to our success and as such we take our obligations and commitments to our colleagues and the organisations we serve seriously. Our independence, our reputation as a supplier of quality services and the trust of our clients are always protected.

We are committed to the principles of honesty and integrity and hold all those involved in serving our clients to high standards as outlined in our Code of Ethics. Our suppliers are bound by our Supply Chain Code of Conduct, which clearly outlines the standards we expect to be achieved or exceeded.

All colleagues undertake extensive screening and background checks to ensure they are suitable for the position they have applied for and meet our ethical standards. These checks vary by jurisdiction to consider local legal requirements; however, all of these include a comprehensive employment and education history, criminal records checks and address and identity verification. Screening is refreshed on a three year cycle.

Business continuity

Our Business Continuity Policy outlines key principles and colleague obligations. This is supported by local business continuity plans addressing specific requirements from recover task lists and operating procedures to incident management team contact details.

Risks are assessed in line with our Group Risk Management Policy and as part of regular risk reviews conducted by individual departments and the global standards and support team. Tabletop exercises are regularly updated with internal systems/personnel changes as well as plausible threats on the horizon.

Policies and statements

Our Code of Ethics, Modern Slavery, Anti-bribery, Human Rights, Whistleblowing and Supply Chain Policies are published on our website.

View our policies and statements online at www.nccgroupplc.com/sustainability/governance

Our journey highlights

We continue to make progress, listening to and understanding key stakeholder requirements – both internally and externally – making strategic decisions on where we focus our efforts.

2020

- Launched our sustainable development framework
- Published our ESG content on the website and created a resource hub with relevant policies and statements
- Focused on developing our inclusion and diversity and wellbeing programme in line with societal changes and the global pandemic
- Developed our resilience plan to protect our business from the effects of the pandemic

2021

- Established the TCFD working group to prepare for 2022 reporting
- Joined the UN Global Compact

2022

- Appointed Planet Mark to support our GHG emission reduction programme and achieved our first Planet Mark certification
- Began reporting against the TCFD framework

2023

- Conducted our first materiality assessment, looking at both inward and outward impacts
- Signed up to the Carbon Disclosure Project
- Achieved year two of the Planet Mark certification and a reduction of carbon footprint per colleague of -4.6%
- Launched our first sustainability strategy

2024

- Gap analysis against European Sustainability Reporting Standards to enable voluntary reporting
- Improved GHG Emissions Scope 3 reporting to include spend-based purchased goods and services, and employee commuting
- Harmonised and launched global employee benefits around key life stages
- Appointed Positive Planet as our new climate action partner

2025

- Work underway to map our journey to net zero and set science-based targets
- Develop KPIs to base future ESG reporting from

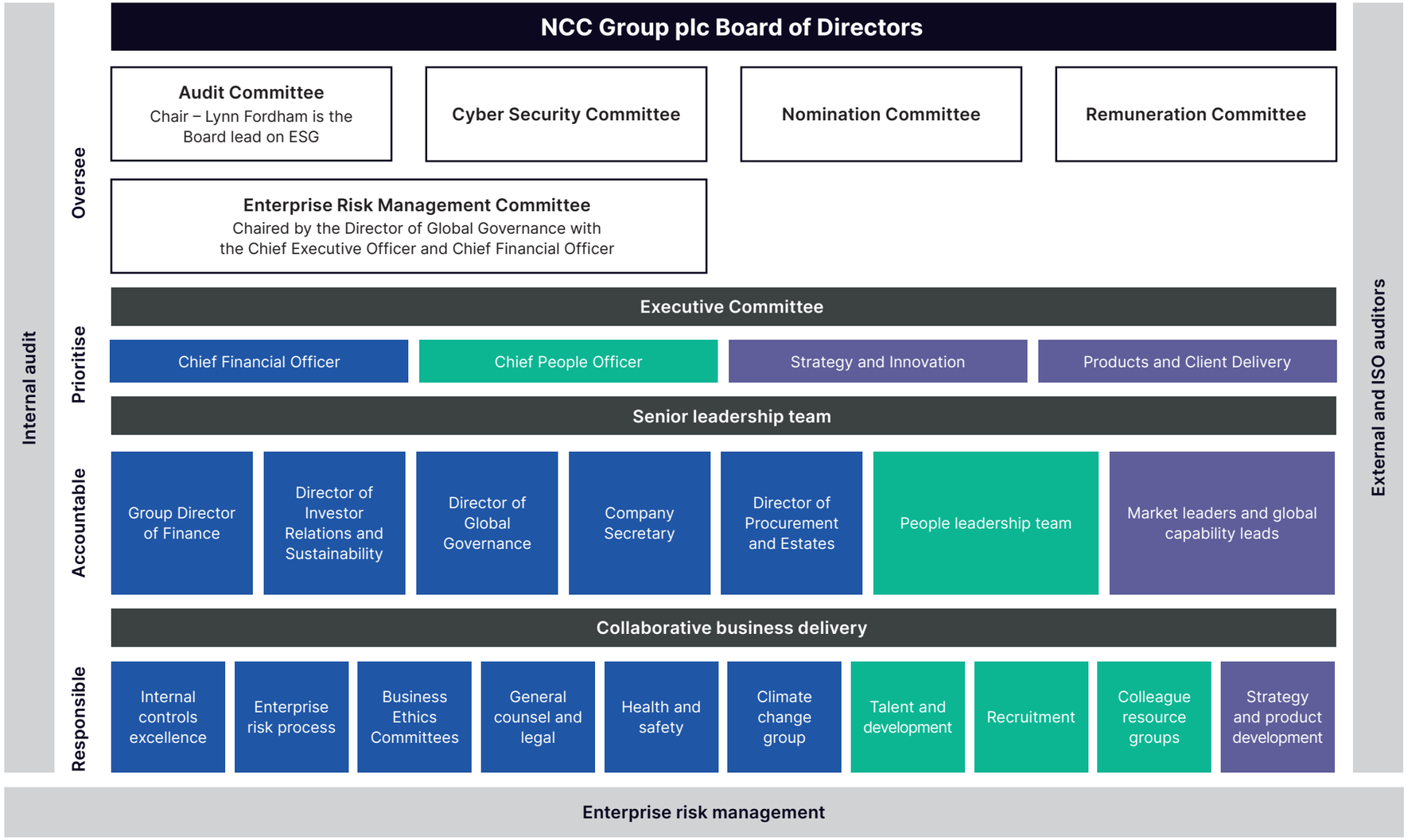
People-led, technology-enabled · Action on climate · Responsible business

Governance and delivery

The Board of Directors and Executive Committee have overall responsibility for NCC Group's ESG performance and associated governance and oversight. Our model enables us to bring together the skills and knowledge of our Board, our executive team and business leaders to drive our approach to bring our insights, intelligence and innovation to life – striving for sustainable and responsible best practice business operations.

The model opposite highlights the key roles/areas of responsibility at each level for ESG measures, which are in support of our sustainability strategy.

See page 55 of our Annual Report and Accounts 2024 for a description of our Board Committees and their responsibilities



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