



GOVERNANCE

nccgroup[®]

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



NCC Group Anti-Slavery and Human Trafficking Statement

Issue date: 29 November 2022

Anti-Slavery and Human Trafficking Statement

Our commitment

This statement is made on behalf of NCC Group plc and its subsidiaries pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement for the financial year ended 31 May 2022 as approved by the board of directors.

Our business and ethics

NCC Group plc is a public limited company registered in England and Wales (registered number 4627044) and is listed on the London Stock Exchange. The Group has over 2,000 colleagues and provides Cyber Security and Software Escrow services across the world.

As a company with a premium listing on the London Stock Exchange and a member of the FTSE 250 index, we always work to the highest ethical standards and comply with all laws, regulations, and rules relevant to our business. We have a zero tolerance towards modern slavery, and we realise that our relationships with those we deal with, whether colleagues, clients, investors, suppliers, or the local community, are key to our success and as such we take our obligations and commitments to these stakeholder groups very seriously.

Our approach

We expect high standards from those we work with and are committed to doing everything within our control to ensure there is no modern slavery or human trafficking in any part of our business or associated supply chain.

In the previous 12 months we have updated our formal Procurement strategy and enhanced our systems and reporting to allow us to better control our cost base and supply chain operations, in collaboration with other key departments across the business. We have also introduced a supplier relationship management programme to enhance our discussions with our key suppliers (based on value and risk) around commercial, operational, and risk management.

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.

The Whistleblowing Policy is accessible both internally and externally and translated in local languages where we are based. Notices about the policy and the helpline are also prominent both on internal news /intranets and in physical communal areas and forms part of induction training and annual compliance training.

Our people

A fundamental role of our business is to keep our clients safe from cyber threat. This also translates into the non-cyber world, for both our own people and those in our supply chain. We have training available for our colleagues, which better informs them to identify risk factors, understand the implications and assist us in implementing our anti-slavery stance.

All our colleagues undergo identity and right to work checks as part of the recruitment process and prior to commencing employment with us. Reference checks and, where appropriate, criminal background checks also take place. We employ a large proportion of people directly or on a fixed-term basis with checks in place to ensure that the payment of salary is made directly to that person.

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Our supply chain

Although slavery is an illegal practice in all developed countries, it unfortunately still exists, and is a brutal form of organised crime where people are forced to work against their will under the threat of some form of punishment or detriment. Most of these people are in the supply chains of legitimate industries.

We spend approximately £70 million globally per annum with our supply chain partners ranging from, but not limited to, the procurement of IT hardware and software licences, facilities management services, and a wide range of professional services.

Our highest risk of modern slavery is within our supply chain owing to its size and complexity. As a result, we have built upon the foundations already laid and will make an even greater positive step change in 2023. Through better communication, education, and collaboration, we will mitigate any potential risks of modern slavery to our business operations. Modern slavery processes will continue to be updated in our procurement and governance processes to ensure compliance to both legal requirements and industry best practice. This includes the continuation of the formal supplier relationship management programme (where appropriate) and working with the Chartered Institute of Purchasing and Supply (CIPS) and other industry peers to identify further areas of opportunity for improvement.

Our journey continues

We are confident we continue to make progress, recognising the fight against modern slavery is not static. Therefore to continually assure our mitigation in the next financial year we will focus on the following areas:

- Full global supply chain mapping and refinement of the associated strategies across key categories of spend.
- Continuing to map the higher risk categories of our supply chain to better understand where our risks lie, allowing us to introduce a more appropriate level of contract management and action plans for any risks that are identified.
- The introduction of a standard global approach to our Procurement Project Management Office (PMO), ensuring all key sourcing projects are fully scoped and consider commercial, operational and ESG criteria (including modern slavery) within all evaluation criteria. This PMO approach will also ensure effective mobilisation plans are in place to ensure successful implementation of all projects.
- Greater visibility and communication with our supply chain partners and industry peers, through a refreshed supplier relationship management programme.
- Reinforcement of the Global Procurement Strategy across NCC Group that will introduce clear and concise processes for colleagues to better control who we spend our money with, and the due diligence required prior to placing orders. This will encompass both direct (where appropriate), and indirect supply chains.
- Enhance our data reporting to support informed decision making, gaining better transparency of our business operations and the supply chain partners that help us to deliver them.

This statement was approved by the Board of NCC Group plc on 29 November 2022 and signed by

Mike Maddison
Chief Executive Officer
NCC Group plc