



# Securing our future

NCC Group plc – Sustainability strategy launch report

nccgroup 



## Introduction

# Creating a more secure digital future

NCC Group is a people-powered, technology-enabled global cyber security and software escrow business operating across multiple sectors, geographies, and technologies.

## Our purpose

To create a more secure digital future.

## Our vision

Our aspiration is to move beyond our historical strengths to become a truly global cyber security services provider, capable of delivering an end-to-end solution harnessing our strengths in insight, innovation and intelligence, and create an exceptional client experience.

### What to look out for within this report

[Follow the story online](#)

[Within this document](#)

[Read more in our Annual Report](#)



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## About us

# Building global cyber security capability to advance sustainable development

As a people-led, technology-enabled business, we provide solutions for our clients that help create a more secure digital future – this is our purpose.

We are trusted by the world's biggest brands to manage their cyber security and we firmly believe our purpose and approach to sustainability are intertwined – ultimately securing our future as a business. Central to this is building a global cyber security capability that enhances and advances sustainable development.

## What we do

We bring our decades of collective experience and expertise across the whole cyber spectrum to assess, manage and deliver cyber resilience for clients in both the public and private sector.

We have two distinct businesses, through which we deliver solutions to support our clients' operational goals, budgets and risk appetite, providing confidence that their most important assets – business reputation, software and personal data – are safe and secure.

[Read more on page 3](#)

## 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 and Singapore, and our new office in Manila, the Philippines.



## Purpose and vision



# Cyber Security

## We demystify cyber and ensure clients:

- Understand the cyber threats and vulnerabilities across their technology environments, supply chains, processes and products.
- Maintain their licence to do business, having achieved their governance, compliance and accreditation objectives in a changing regulatory environment.
- Materially improve their resilience against ever-increasing cyber threats by implementing remediation plans and solutions.
- Reduce risk and achieve greater resilience for less investment.
- Can improve their cyber defence operations and increase their confidence in detecting and responding to cyber threats.

Read more on Cyber Security in our Annual Report and Accounts 2023 pages 32 and 33

Cyber Security revenue

# £270.8m

(2022: £258.5m)

# Escrow

## We protect the development, supply and use of business critical technology and software applications:

- Buyers are safeguarded from supplier failure, software vulnerabilities and unforeseen technology disruption.
- Our on-premise and cloud offering can demonstrate robust business continuity and risk mitigation, and suppliers benefit from enhanced credibility and intellectual property rights protection.
- Escrow contract services secure the long-term availability of business critical software data and applications.

Read more on our Escrow business in our Annual Report and Accounts 2023 on page 34

Escrow revenue

# £64.3m

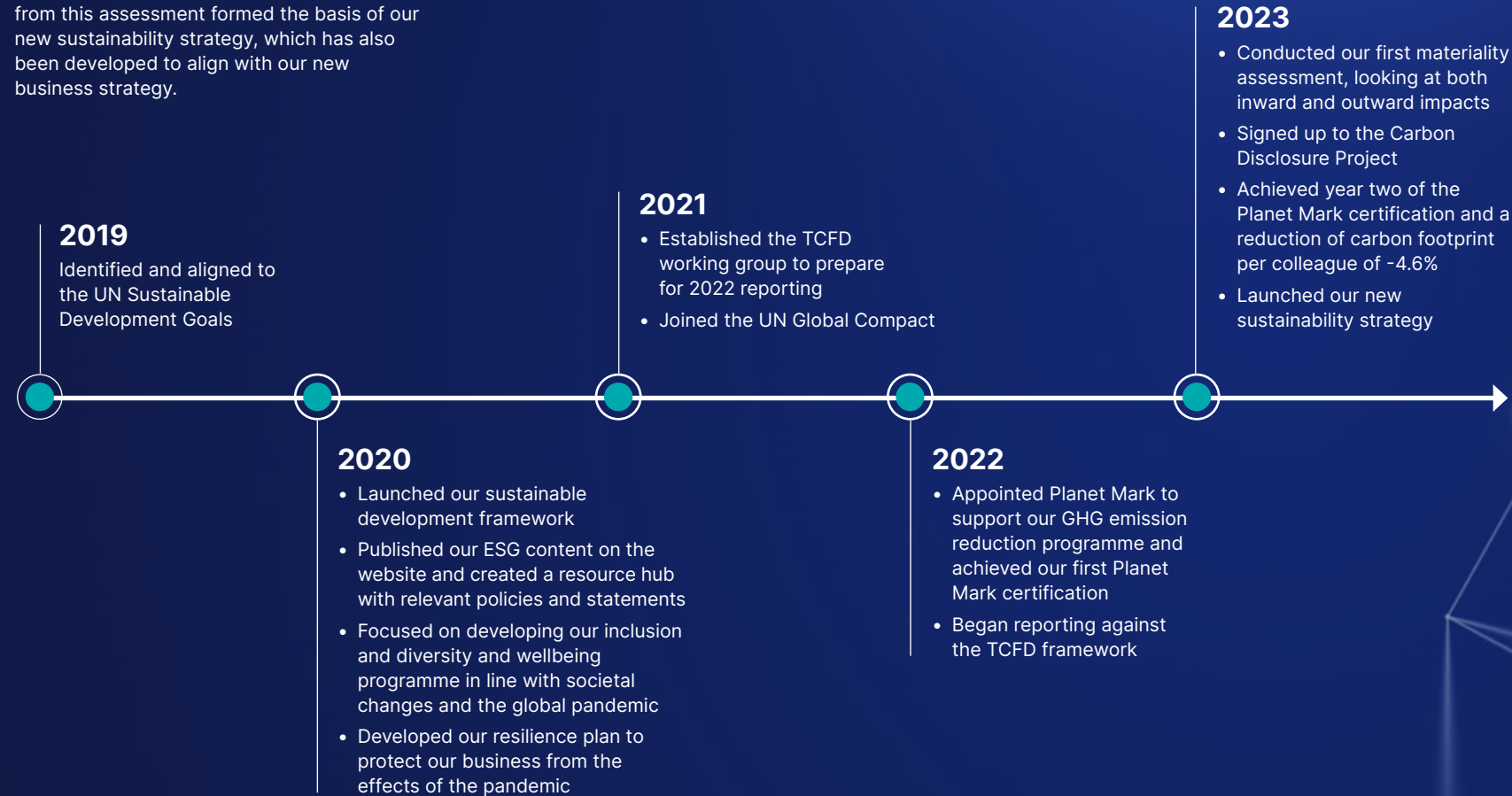
(2022: £56.3m)





# Our journey highlights

We are just at the start of our sustainability journey and over the past few years have been building capability internally and undertook our first materiality assessment in early 2023. Insights from this assessment formed the basis of our new sustainability strategy, which has also been developed to align with our new business strategy.



# Securing our future

At the heart of our sustainability approach is our purpose to create a more secure digital future enabling future technology solutions to advance sustainable development.

We recognise the paramount importance of cyber security as the world becomes more connected and relies on technology to progress. As a people-powered, technology-enabled global cyber security and software escrow business, we provide solutions that aim to make the digital world more secure and resilient. Our focus extends from cutting-edge technologies critical to achieving global net zero ambitions and reducing social inequalities, to fortifying existing technologies against potential cyber threats that harm society and the economy.

 Read more on our business strategy in our Annual Report and Accounts 2023 on pages 24 to 27



It is our responsibility to uphold the promise we've made to our stakeholders, placing sustainability at the core of our business ethos."

**Mike Maddison**  
Chief Executive Officer



## People-led, 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.

# Our performance highlights in FY23

With the launch of our new sustainability strategy, we are now going to engage with colleagues and various stakeholders to develop the KPIs that will drive progress forward. This will inform future reporting metrics that we will publish to demonstrate progress against the plan. As a result the following performance highlights are given as an illustration of activity over the past financial year.

## People-led, technology-enabled



Colleagues promoted

504

Colleagues taking up new roles within the Group

64

Mental health first aiders

+40

Colleague resource groups

5

[Read more on pages 10 to 13](#)

## Action on climate



FY23 reduction of emissions per colleague

(4.6%)

Scope 1 percentage of total emissions

10.8%

Scope 2 percentage of total emissions

59.9%

Scope 3 percentage of total emissions

29.3%

[Read more on pages 14 to 19](#)

## Responsible business



Eligible colleagues completing annual compliance training

100%

Colleagues on government advisory boards and groups

9

One-to-one shareholder meetings

66

Government or regulator plans, policies and laws shaped

18

[Read more on pages 20 to 23](#)





# Securing our future



By placing sustainability at the heart of our strategy, we're not just securing the digital world, we are securing the future for ourselves and generations to come."

**Mike Maddison**  
Chief Executive Officer

This year, with the launch of our new business strategy, we felt it was time to take a fresh look at our approach to sustainability and formalise our commitments to climate change, social value and governance.

We sought expert support to conduct a materiality assessment, looking at both the inward and outward impacts of our business. We spoke with investors, clients and colleagues to understand what was important to them and what they thought NCC Group should focus on, and we looked at industry sector trends to get a feel for how we could take this forward.

The result is a fresh, new framework with very clear areas of action for us to focus our efforts on, alongside the launch of our first sustainability strategy.

## Why sustainability matters

Sustainability is about doing the right thing in the right way, and this is reflected in our Code of Ethics and embedded into our everyday ways of working. It's important to our clients, who trust us to help secure their digital assets; it's important to our colleagues, who are critical to the value we bring to our clients; and it's important to our shareholders, who entrust their investments to NCC Group, relying on us to deliver returns to their shareholders. It also matters to our political stakeholders who turn to us for trusted and independent advice and insights that improve cyber rules and regulations around the world.

We live in a rapidly evolving digital world, where the concept of sustainability extends to how we operate in totality. Not only are we supporting our clients to meet their governance requirements through our cyber security and escrow solutions, we are also helping to advance technologies that are at the forefront of fighting climate change, as well as other UN Sustainable Development Goals.

This means systems, networks and infrastructures need to be resilient, secure and long lasting. Cyber security and sustainability are inherently intertwined, which means cyber threats pose a significant risk not only to individual businesses but to our very way of life too. The decisions we make today have far-reaching implications for the future.

## Securing our future

As our lives become more digitally interconnected, the risk landscape broadens. From smart homes to smart cities, from online banking to telehealth services, from power grids to water supplies – they all rely on complex digital infrastructures. If these systems are compromised, the repercussions can be devastating.

Hence, securing these infrastructures is an essential part of ensuring a sustainable future. Our ability to protect against cyber threats, through the work we do for our clients, plays a pivotal role in guaranteeing that our world remains functional, reliable and consistent for generations to come. Indeed, we believe strongly that we can't build a resilient economy without resilient cyberspace, and we can't have a resilient cyberspace without 21st century laws and an infrastructure to tackle cyber threats, which is why we share our expertise with policy-makers to improve cyber rules and regulations meaningfully.

## Our sustainability framework

While the primary focus of our industry has always been about security, we recognise our operations have a broader environmental and societal impact. We're launching our sustainability framework, with two core tenets focused on people and the planet, underpinned by being a responsible employer and supply chain partner.

This new framework gives us a fantastic foundation to start making tangible progress in addressing material topics for our stakeholders. We're developing KPIs and assigning executive ownership, and we will engage specifically with colleagues and our supply chain partners as we seek to improve our data points in next year's report – all with the aim of striving for continuous improvement.

By placing sustainability at the heart of our strategy, we're not just securing the digital world, we are securing the future for ourselves and for generations to come. We invite our stakeholders to join us, working together to build a future that is not only secure but also sustainable.

**Mike Maddison**  
Chief Executive Officer



# Mapping what matters most

This year we undertook a double materiality assessment to understand the impact of key sustainability topics on our business, and our impact on these areas. This included engaging with our stakeholders to understand and take into consideration their views. The matrix summarises our findings and helped us to prioritise the issues that will drive impact via our new strategy.

**People-led, technology-enabled**

- Inclusion and diversity
- Professional development
- Colleague mental health and wellbeing
- Colleague engagement

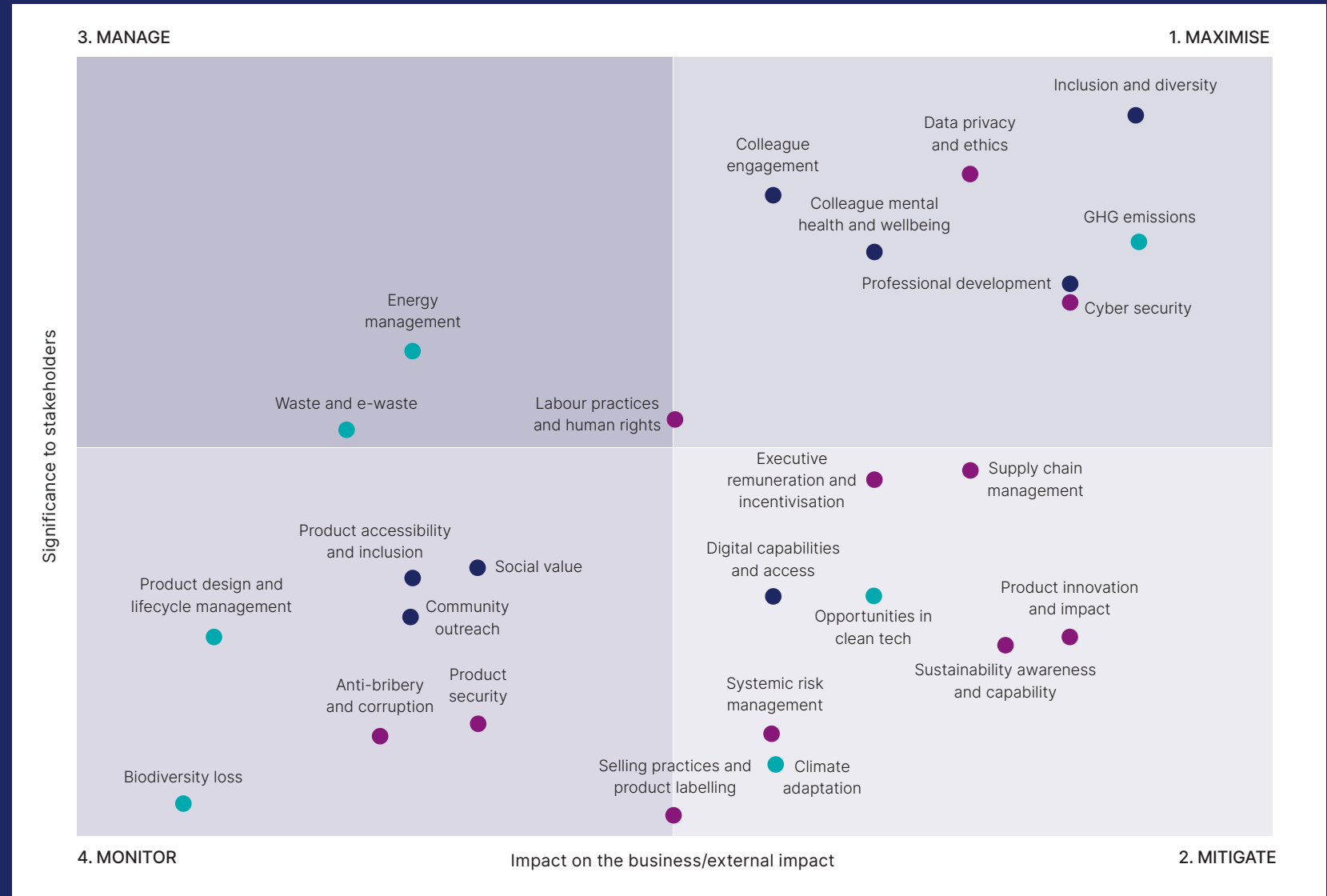
**Action on climate**

- Greenhouse gas emissions
- Product innovation and impact
- Opportunities in clean tech
- Energy management

**Responsible business**

- Data privacy and ethics
- Cyber security
- Supply chain management
- Executive remuneration and incentivisation
- Labour practices and human rights

Read more on our approach and ambition in our Annual Report and Accounts 2023 on pages 46 to 49





# Sustainable development and our commitment to a safer and more secure digital world

We believe that sustainable development is inextricably linked to the safety and security of the digital world. It is at the heart of our purpose and is why we support the United Nations 2030 vision and use the Sustainable Development Goals (SDGs) as a framework to guide us.

While the SDGs were primarily created for governments, they form an integral part of the UN's 2030 vision, which also calls on businesses to harness their creativity and innovation in addressing global challenges. We know, through the work we do for our clients, that we can be a real catalyst for change. Not only does this alignment present significant business opportunities, but it's also our responsibility to proactively make change happen.

We don't just see the SDGs as a call to action, rather they are a lens through which we can understand and influence for change, and make a tangible, positive impact on society.

Our clients are embracing digital transformation, and we see the potential for each of the SDGs to be entwined as this develops, and therefore the important role we play in helping clients to do this safely and securely. For example – smart cities empower communities by providing access to information and opportunities without exacerbating our environmental footprint. In health, digital platforms and tools are vital for remote care, diagnosis, and research. And in education, we've seen e-learning platforms breaking down barriers and making education, and access to knowledge accessible by all.

As society continues to rely on digital technologies, there is complexity and interdependencies in the supply chain, which increases the threat landscape. The connection between all these technologies, makes the task of securing these expansive networks even more crucial. By making the digital world safer and more secure, working with our clients to understand how technology supports them to be more sustainable, we're safeguarding futures, opportunities, and the core of a sustainably developed world.

Our alignment with the SDGs is both a strategic and moral choice. We will use our insight, innovation and intelligence to help pave the way for a future where technology and sustainability go hand in hand.



Examples of how we are supporting SDGs through our client work

## Improving security for a university

We reviewed the university's online security and helped implement the changes needed to gain Cyber Essentials accreditation. This is mandatory requirement for the university to enable them access to funding applications.

In a two-day workshop we help the university team to create a step by step project plan, which was implemented in collaboration with the in-house security experts, bringing in policy changes and made significant improvements to all aspects of their security.

Read the full case study online at [www.nccgroup.com/uk/case-study-improving-security-for-higher-education/](http://www.nccgroup.com/uk/case-study-improving-security-for-higher-education/)

## Helping an operator of essential services achieve Network and Information Systems (NIS) compliance

Our client, in advance of an inspection from the UK Office of Gas & Electricity Markets (Ofgem), wanted an independent assessment that would clarify the current maturity of their security posture.

The client's position was assessed against the Cyber Assessment Framework (CAF) baseline commitment, demonstrating whether the client had achieved its self-assessed position against the NIS guidelines. Our experts carried out a series of pragmatic security assessments provided the client with a comprehensive report, providing a rating for each CAF requirement, rating, and recommendation on remediation actions.

Read the full case study online at [www.nccgroup.com/uk/case-study-helping-achieve-nis-compliance-for-an-operator-of-essential-services/](http://www.nccgroup.com/uk/case-study-helping-achieve-nis-compliance-for-an-operator-of-essential-services/)

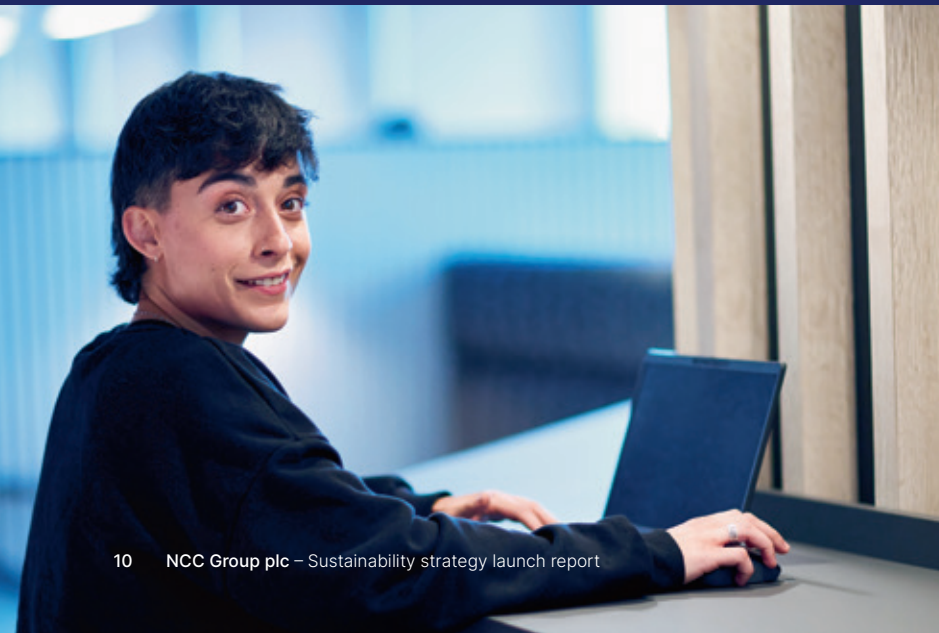




# People-led, technology-enabled

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, to optimise talent, and to enhance the colleague experience.







## Build an inclusive culture

An inclusive culture enhances team creativity and innovation, directly enhancing 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, 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.

### 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. We have embedded inclusion and diversity 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 (gender, LGBTQIA+, neurodiversity, accessibility, race and ethnicity) 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

Over the past few years we have made steady progress in building a more inclusive workplace. However there is more to be done, and this year, having worked closely with our colleague resource groups, we have actively encouraged colleagues to share additional diversity information securely in our HR management system – Workday. Where this data is provided, it will support us to develop targeted initiatives to build a more inclusive workforce.

### Our future and ambition

To further underline our support and bring to life our value, embracing difference, we intend to continue making progress. This year we started collecting colleague data so we can create a baseline measure, benchmark ourselves against leading organisations and measure progress in a meaningful way. The data will focus our efforts to ensure sustained positive impact.

We will continue to seek partnerships and alliances with external partners to strengthen our diversity initiatives beyond the NCC Group community. Established partnerships include UK-based Uptree – targeting young people before they leave school, JINC in the Netherlands, which strives for a society where a young person's background doesn't determine their future, Capslock – a UK-based training organisation providing accessible funding for people who want a cyber career. In the past year we have partnered with Women In Cyber Security – a global organisation aimed at supporting the recruitment, retention and advancement of women in cyber security.

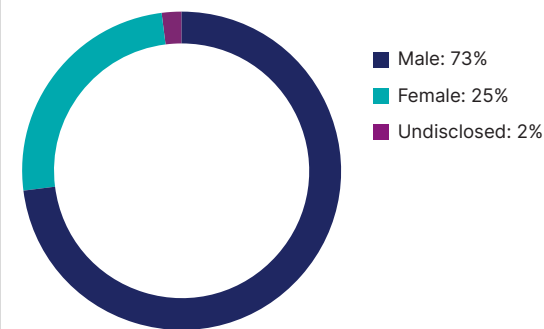
There are many more and we actively encourage colleagues to get involved, from giving talks to organising workshops or taking part in local mentoring schemes. Through all these actions we are positively contributing towards increasing diversity within the technology sector.



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

**Michelle Porteus**  
Chief People Officer

### Gender diversity



Read more on our gender diversity in our Annual Report and Accounts 2023 on page 44

Follow the story online at [www.nccgroupplc.com/sustainability/social/gender-pay-gap/](http://www.nccgroupplc.com/sustainability/social/gender-pay-gap/)



### Case study

## Partnering with Empowering You to build powerful communities of female cyber security leader

For the third consecutive year, we are continuing our partnership with Empowering You – a cross sector initiative in the UK to help build communities of diverse, authentic, female leaders in digital and cyber security, through their Empowering Women to Lead programme.

Backed by industry and government, the regionally delivered programme supports the sector's emerging leadership talent through inviting women across the country to apply to participate in a free three-month course designed to enable the transition of aspirational and early to mid-career professionals, team leaders and managers into more confident, capable, and energised leaders.

Through the partnership, we will feed into the development of the programme, scope successful applicants and support them on their journey through a series of workshops, talks and mentoring sessions.

Find out more online at [newsroom.nccgroup.com/news/ncc-group-partners-with-empowering-you-to-build-powerful-communities-of-female-cyber-security-leaders-472433](http://newsroom.nccgroup.com/news/ncc-group-partners-with-empowering-you-to-build-powerful-communities-of-female-cyber-security-leaders-472433)





## Optimise talent for a secure digital future

With ever advancing technologies, and the subsequent developing threats, it's critical 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 make the digital world safer and more secure. With our roots stretching back to the 1990s we have a track record of being at the cutting edge of innovation – insight, innovation, and intelligence are the core elements of our DNA. This is

what gives us our position in the market that no one else can match and this is achieved through our investment in the critical skills to deliver for our clients.

### 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 such as LinkedIn learning, as well as 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 skills needed 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 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.

In FY23, 504 colleagues were promoted to more senior roles and 64 colleagues took up new roles within the organisation. Across our global operations, over 500 new colleagues joined NCC Group.

We actively encourage mentorship within the organisation, with formal and informal agreements in place across the organisation. Our global delivery community are actively encouraged and supported by senior technical experts to their reports on our dedicated technical blog. This mentorship

programme is critical not only for their development, but also plays an important role in the broader security community.

We are in the process of developing our new management development programme which will ensure our managers have the right skills and behaviours to effectively lead their teams in the future.

### Developing the next generation of talent

Since 2013, we've welcomed over 200 colleagues into our Next Generation Talent programme, which has gained industry recognition including the 2017 JobCrowd Top 100 companies to work for in the "IT Development and Consulting" category. In 2022, we received over 700 applications for 40 places across our global operations.

We are an industry partner with the UK Government's CyberFirst scheme with representation on the advisory board and colleagues across the UK getting involved to support various activities in local schools. This also includes providing summer placements and bursaries to students going through the scheme.

### Our future and ambition

By investing in our people, we will position ourselves as a market leader in cyber security, delivering effective solutions for our clients – always looking 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 in discussions on cyber security policy and raising awareness of cyber threats.



Fostering continuous learning is what makes us successful. Colleagues gain new skills, certifications and industry insights through training, workshops and on demand resources. Diverse skills are vital for innovation, and innovative thinking helps us tackle complex challenges with unique client solutions."

**Mike Maddison**

Chief Executive Officer



## Enhance the colleague experience

Creating an exceptional colleague experience is the key to unlocking our 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 keep 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, heard and psychologically safe, they are more likely to innovate and contribute to a more positive client experience. By creating the right environment, we can create 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.

### Our approach to colleague engagement

We operate a speak up policy, where colleagues are encouraged to respectfully share their feedback, ideas and concerns through various mechanisms including:

- Non-Executive Director led discussions, which provide direct feedback to the Board.
- Elected colleague representative forums in the UK, Spain and Australia.
- Works Council in the Netherlands.
- Quarterly anonymous colleague feedback process through an independent third party provider.
- Local business and regional town halls, with open forum Q&A.
- Bi-annual performance management process and regular one-to-ones with managers.

Investment in learning and development (see page 12 equips colleagues with the skills they need to excel in their roles and adapt to the changing needs of our clients.

We celebrate success through our annual NCC Diamonds programme, which is a peer to peer nominated programme against our core values. Regional and global winners are selected by a diverse judging panel and stories are powerful examples of the talent within our organisation.

Our reward programme continually evolves to ensure we are competitive within our industry and positions us to attract and retain top talent by using various benchmarking sources and market intelligence to ensure pay and reward decisions are fair and equitable. Through our Non-Executive Director engagement activities we seek feedback on Executive remuneration and reward too.

We operate a hybrid working policy, which was developed as we came out of the global pandemic. This provides a general framework, that enables each part of the business to design a way of working that is appropriate to client delivery. This supports our overall health and wellbeing programme addressing both physical and mental wellness.

Our global giving back programme supports colleagues to get involved in their local communities – providing match funding up to the equivalent of £500 a year per colleague, as well as giving every colleague the opportunity to take one day off in service of a good cause. Colleagues can do this individually or as a team, which is a great way for them to engage in team building activities.


### Our progress

This has been a year of change across our business as we designed and implemented a new operating model creating global agility to evolve to meet the needs of our clients.

To support us in managing the change, and to ensure we received a more regular pulse on colleague sentiment and engagement, we moved away from the traditional annual colleague survey to a quarterly based survey. This empowers managers to make changes based on real-time feedback by providing direct access to anonymised results. The insights from this, as well as our other communication channels with colleagues, are discussed and considered in both Executive and Board decision making.

We have improved our colleague benefits over the past year, providing colleagues with access to discounts and wellbeing support through Perkbox, as well as enhancing Employee Assistance programmes and benefit packages in North America.

Our colleague resource groups continue to help shape engagement activities, and areas for improvement with direct access for the Committees to the Chief People Officer and other Executive team members.

 Read more on our progress this year in our Annual Report and Accounts 2023 on pages 43 and 44

### Our future and ambition

There's always more we can do, and to take this forward we appointed a dedicated colleague experience lead at the start of our new financial year, who will work closely with various stakeholders across the organisation to develop a new colleague experience programme.



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."

**Michelle Porteus**  
Chief People Officer





# 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.





## Support the net zero transition

We have a responsibility to reduce our carbon emissions as a business by understanding all applicable Scope 1, Scope 2 and Scope 3 emissions, and taking credible steps towards reducing them in line with the international Paris Agreements objective to achieve net zero emissions before 2050.

### 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 supporting our clients with their cyber security challenges and minimising the impact of that on their emissions. We know the importance of net zero transition to our colleagues and it's an important consideration for attracting future talent too.

### Our approach

At this early stage of the journey, we are focusing our efforts on understanding the source of our full emissions and putting in place processes that will improve our data collection and reliability and enable future science-based targets to be set. As a global professional services organisation, with just over 2,000 colleagues employed, we partner with experts where appropriate to support each stage of the maturing journey and to map our net zero transition plan.

### Our progress

In 2022, as part of our preparation for reporting against the Task Force on Climate-related Financial Disclosures (TCFD) framework for the first time, we appointed Planet Mark to certify our greenhouse gas emissions. In Year 2 of this reporting we have experienced a temporary increase in our total emissions, however we reduced our emissions per colleague by 4.6%. We also undertook Energy Savings Opportunity Scheme (ESOS) audits in the UK, and the Energy Efficiency Directive (EED) audit of our Delft leased office in both FY23 and in FY24.

### Executive and Board engagement

In 2022 at the start of our new financial year, we invited Planet Mark to run a workshop with the Executive Committee and then with the NCC Group plc Board members too. This workshop gave participants the opportunity to reflect on the journey ahead, using the baseline data from our first Planet Mark certification, and to commit to embedding net zero transition into business decision making. In January 2023, Non-Executive Director and head of the Audit Committee Lynn Fordham was appointed the Board person with responsibility for sustainability.

### Leased office buildings

In FY23, we significantly improved our leased office data collection, including adding in data centres, through improved landlord engagement and accounting for all relevant office spaces.

We also took decisions to close, enhance or reduce leased buildings in line with a strategic business review, to assess what physical spaces we need to service our clients better.

Through an improved decision making process we've set a standard for all future locations with greater landlord engagement on their transition plans to net zero as a requirement. See page 19 for an example of this in action with our new office in Manila.

### Colleague commuting

As part of our materiality assessment we incorporated a questionnaire for colleagues to collect commuting data for enhanced Scope 3 emissions reporting. Unfortunately, we didn't achieve the 40% participation rate that was needed to enable us to include this in our FY23 Greenhouse Gas (GHG) report. The data we did capture, however, has given us a data point from which to build into our ongoing colleague engagement plan and we will continue to work on this to improve participation.

We introduced a green car lease scheme in the UK and are phasing out the UK fleet programme, transitioning eligible colleagues to this new scheme.

### Purchased goods and services

In early 2023, an exercise to gather supplier specific GHG emissions from our suppliers yielded a poor response rate, which we know is something many organisations struggle with. Following GHG Protocol guidance on Scope 3 Category 1 Purchased Goods and Services, we will seek to explore other data collection methods to establish a baseline for our FY24 reporting period.

### Carbon Disclosure Project

We signed up to the Carbon Disclosure Project to make it easier for our clients to understand and account for our emissions as part of the service we offer, but also to enable us to gather our significant supplier emissions. Our first report is due early in 2024 from the submission we made in July 2023.

### Our future and ambition

Our ambition is to set credible science-based targets that enable us to define how we will achieve net zero emissions before 2050.

In the year ahead to continue the journey toward our net zero ambition our focus is on:

- Enhancing our Scope 3 emissions by reporting on Purchased Goods and Services, and colleague commuting.
- Identifying opportunities to transition to renewable energy sources for our leased office buildings and data centres.
- Procuring a new travel tool, which improves how we book (lower carbon options) travel and report on the subsequent emissions.
- Launching our new colleague engagement climate change programme, helping to educate and embed conscious decision making at every level of the organisation.



**Our ambition is to set credible science-based targets that enable us to define how we will achieve net zero emissions before 2050."**

**Yvonne Harley**

Director of Investor Relations and Sustainability





## Develop sustainable solutions

Developing sustainable solutions goes beyond environmental conservation, economic stability and social equity for a business like NCC Group. Cyber security enables 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.



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

**Siân 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 policy makers, industry think tanks and governments, we gain firsthand 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.



### Case study

## Enabling rapid scale up of biogas operations

We worked with a biogas producer and distributor to deliver a Cyber Assessment to provide them with a holistic 'as-is' view of the cyber maturity, along with recommendations to improve both short-term and long-term as they begin to rapidly scale their operations.

As energy companies often rely heavily on Operational Technology (OT), a key challenge they have is balancing the security of these systems with their availability and maintainability. Legacy systems are regularly used, and due to this, common IT controls are not always able to be implemented due to system limitations. Securing OT systems poses a new challenge for many organisations.

### The solution

We were able to assemble a team of consultants from across our global business with varying skillsets such as industrial process control systems, network penetration testing, Microsoft systems, wireless communications, risk management and governance experience. It took seven weeks to complete, and the client report details current compliance to the standards and frameworks their controls were measured against. The reports also contained descriptions of key observations with recommendations on how to improve their current level of cyber maturity.

As a result, the client had the information they needed to confidently begin scaling their operations to produce biogas – an important industry to help fight climate change.

 **Develop sustainable solutions**  
continued



**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. The best way to demonstrate our progress is to share case studies of two pieces of work – one enabling a biogas producer and distributor rapidly scale to produce a greener alternative to fossil fuel gas. The other is providing expertise on digital transformation to enable local councils in the UK embrace new connected and automated road technologies. This brings to life our insight, intelligence and innovation, understanding our client's needs, and how they use technology securely to create the solutions to fight climate change.

**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.



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.”

**Kevin Brown**  
Chief Operating Officer



 **Case study**

**Advising on UK Government's Manual for Smart Streets**

Our transport practice was instrumental in supporting the Department of Transport with the development of the Manual for Smart Streets by providing invaluable cyber security guidance, which is embedded into the Manual's core use cases for digital service development.


Local authorities are working towards the challenging goals of achieving net zero, making transport more accessible and revitalising regional economies. This has led authorities to embrace new connected and automated road technologies which come with new risks such as cyber security.

The Manual is a working document which will continue to evolve with emerging practice and technology and encourages ongoing engagement with the transport technology forum and the wider practitioner community to further develop the content.



While not regulation, its impact is set to be far reaching as it emphasises the need to prioritise security throughout the entire process.”

**Liz James**  
Senior Security Consultant, NCC Group

 Learn more about the Manual online at [www.ttf.uk.net/manual-for-smart-streets/](http://www.ttf.uk.net/manual-for-smart-streets/)



## Decarbonising our energy use

As a global cyber security business, decarbonisation means we need to transition our energy consumption towards cleaner, renewable sources 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, as a people-led, technology-enabled business, travel, our offices and data centres make up a significant proportion of our overall emissions. While we've proven we can move swiftly to remote operations when pandemic restrictions necessitated this – it's very important we can bring people together, selecting the most appropriate way of connection to achieve the best outcome for our clients and our colleagues. Therefore, we need to take action to minimise the impacts we have by decarbonising our energy use.

### Our progress

Over the past 12 months we have focused our efforts on improving the quality of the data we collect so we understand the source of our emissions. Understanding the source and scope of our emissions enables us to take positive action to reduce consumption.

The following initiatives are already underway across the following areas:

#### Optimised office energy use

We lease our office spaces and data centres, many of which are legacy leases; however, coming out of the pandemic and supporting our new global delivery operating model, we have taken steps to optimise our office energy use:



- New leases must be sustainable spaces, with renewable energy (either from the grid and/or self-generated), and energy-efficient spaces that consider water, biodiversity and waste reduction strategies. Offices must also be close to public transport links to encourage colleagues and visitors alike to use greener transportation methods to access our spaces. See our office of the future feature on page 19 as an example of how we are applying this in practice.
- Using information from formalised and informal self-audits we are seeking opportunities to implement energy-efficient measures to reduce our consumption from LED lighting, smart thermostats and energy-efficient appliances.
- Removal of printers for all but essential requirements in UK offices.
- Closing or reducing office space that isn't utilised by colleagues or clients on a regular basis and continually reviewing our office footprint to ensure it is fit for purpose and, as above, applying our new climate positive standards to any new leases signed.

- We operate a hybrid working policy, with colleagues encouraged to use a combination of technology and in-person activity to engage effectively with their stakeholders. We empower people to apply conscious decision-making by considering their own welfare, and the needs of their clients or colleagues in how they operate wherever possible.

### Taking a responsible approach to travel

Where we can deliver remotely we will do so, but equally, as a client-centric business, it's important that we build relationships and are adaptable to different working styles. That said, there are lots of things we can do to minimise the impact of business related travel:

- We encourage colleagues to select the most efficient mode of transport for their business related trips – encouraging them to consider their personal wellbeing and safety, client needs and the impact on their own productivity. Where appropriate and within reason, we would encourage colleagues to select train journeys over short-haul flights.
- Adopt a hybrid-first approach to internal meetings – while we all love spending time together, we recognise it's not always practical to do so for remote workers. We will create set times throughout the year where we encourage people to come together, as well as use technology, and create an effective and valuable virtual and in-person experience.
- Colleagues who benefit from in-person experiences are supported to attend their nearest office or encouraged to come together with others in their locale where possible so they don't feel isolated.
- Where in-person travel is essential, we encourage colleagues to cluster meetings so they can reduce their trips, and ensure they focus on personal wellbeing.

### Our ambition and future

As we deliver on our vision to protect our clients against cyber threats, it's only right we take a leading role in protecting the physical world from the threats of climate change.

In this coming year our primary decarbonisation focus is on identifying further opportunities to move to renewable energy sources for our leased offices and data centres. We will review current renewable energy sources to ensure they meet Renewable Energy Guarantees of Origin (REGO) certification requirements as set by Ofgem in the UK. We'll review the results of ESOS and EED audits in the UK and the Netherlands respectively and implement recommendations to reduce our current energy consumption within the buildings.



As we deliver on our vision to protect our clients against cyber threats, it's only right we take a leading role in protecting the physical world from the threats of climate change."

**Guy Ellis**

Chief Financial Officer



### Case study

## Our Manila operations

Our new office is situated in the Seven/NEO building, which is a pilot project for the International Finance Corporation's Building Resilience Index (BRI) programme. The BRI aims to promote resilient and sustainable infrastructure development in emerging markets, and currently being piloted in the Philippines.

The building successfully earned an A+ rating under the BRI framework demonstrating resilience against climate-related hazards under wind, water, fire and geophysical. Strategically located in a flood-free area, its rainwater harvesting system and pervious concrete design further reduces the risk of flooding. Its biophilic elements also contribute to the building's heat wave mitigation by providing natural ventilation.

The space is also designed with wellbeing of tenants in mind and provides the perfect environment for us to focus on client and colleague needs.

Leading our new office is Saira Acuna. Saira has been with NCC Group for 12 years where she previously led the Sales Operations and Client experience team for the APAC region.

To help establish the business and to ensure we invest in the local community, university partnerships have already been forged, focused on promoting women in technology as well as providing input to the curriculum to help develop future cyber talent.

A great example of our talent development is in the form of one team member, who joined us for experience, then came back to join our next generation talent programme, is now going to Manila on secondment to help train our new team members.

This is just the start, but it perfectly embodies our whole sustainability strategy and commitments.

“

I am honored to be part of NCC Group, a company that is creating a blueprint for the future that is both client-centric and colleague-centric, while considering the environment and giving back to the community. The Manila office will help us further our sustainability strategy. This is a very exciting time for the company, colleagues, and the community we build and serve including the Philippines.

As a previous leader of the Sales Operations and Client Experience team at CC Group, I have firsthand experience in the importance of ensuring equitable access to services and employment practices. I will continue to advocate for these principles and others that are essential to sustainability.”

**Saira Acuna**  
Country Manager







# 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, to protect our stakeholders with leading cyber resilience and data protection standards and to be a responsible employer and supply chain partner.



### Strong governance and ethical standards

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.

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 27001:2013 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 scope of ISO 2001:2013 and ISO 9001:2015 and we are expanding the scope through a phased rollout schedule. We are transitioning to ISO27001:2022 next year.
- 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 Providers.
- 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: 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 27001:2013, ISO 9001:2015 and ISO 17025:2017 certifications.

We are externally audited by Lloyd's Register Quality Assurance, the accreditation body for our ISO 27001:2013 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/governance/accreditations-certifications-and-network/](http://www.nccgroupplc.com/sustainability/governance/accreditations-certifications-and-network/)





## Leading cyber resilience and data protection standards

Our Board formed a Cyber Security Committee in 2016, to focus 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's aim 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 FY23 report in our Annual Report and Accounts 2023 on pages 113 and 114

### 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 quarterly 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 program 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 rights 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.



## Stakeholder 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.

In the past year, we've engaged with governments, regulators and supranational bodies like the United Nations, the World Economic Forum and the Organisation for Economic Co-operation and Development (OECD). We've influenced influencers like parliamentarians and think tanks. We've ensured our expert security voice has been heard in government and policy circles at least three times a week on average, on everything from AI, quantum and the Internet of Things (IoT) through to cyber laws, ransomware and digital skills.

## 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, address and identity verification.

### 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/](http://www.nccgroupplc.com/sustainability/governance/)



### Case study

## Representing NCC Group at the highest level

Katharina Sommer, our Head of Government Affairs, joined the United Nations' inter-sessional consultation on a new cyber-crime convention, sitting alongside representatives from Microsoft, Trend Micro, the Austrian telecoms operator A1 Telekom and others. We made recommendations on how to improve international collaboration between law enforcement authorities, promote cyber capacity building, create innovative approaches to cyber-crime prevention and ensure the effective implementation of the convention once it is agreed in early 2024.

We highlighted the importance of partnership working, even informally, sharing our positive experience of working as part of the UK National Cyber Security Centre's Industry 100 initiative, and made the case for national cyber-crime laws that acknowledge and protect the important contribution of the cyber industry in tackling cyber-crime.

### Case study

## Resilience by design advocacy

We engaged with multiple regulators around the world to advocate for the adoption of "Resilience by Design" principles and practical resilience solutions such as Escrow. As a result, we have shaped regulations in Canada, Switzerland, the UK and India, paving the way for our software resilience business – Escode – to support compliance more effectively.



We've changed global financial regulation to promote resilience by design and include escrow as a recommended compliance solution."

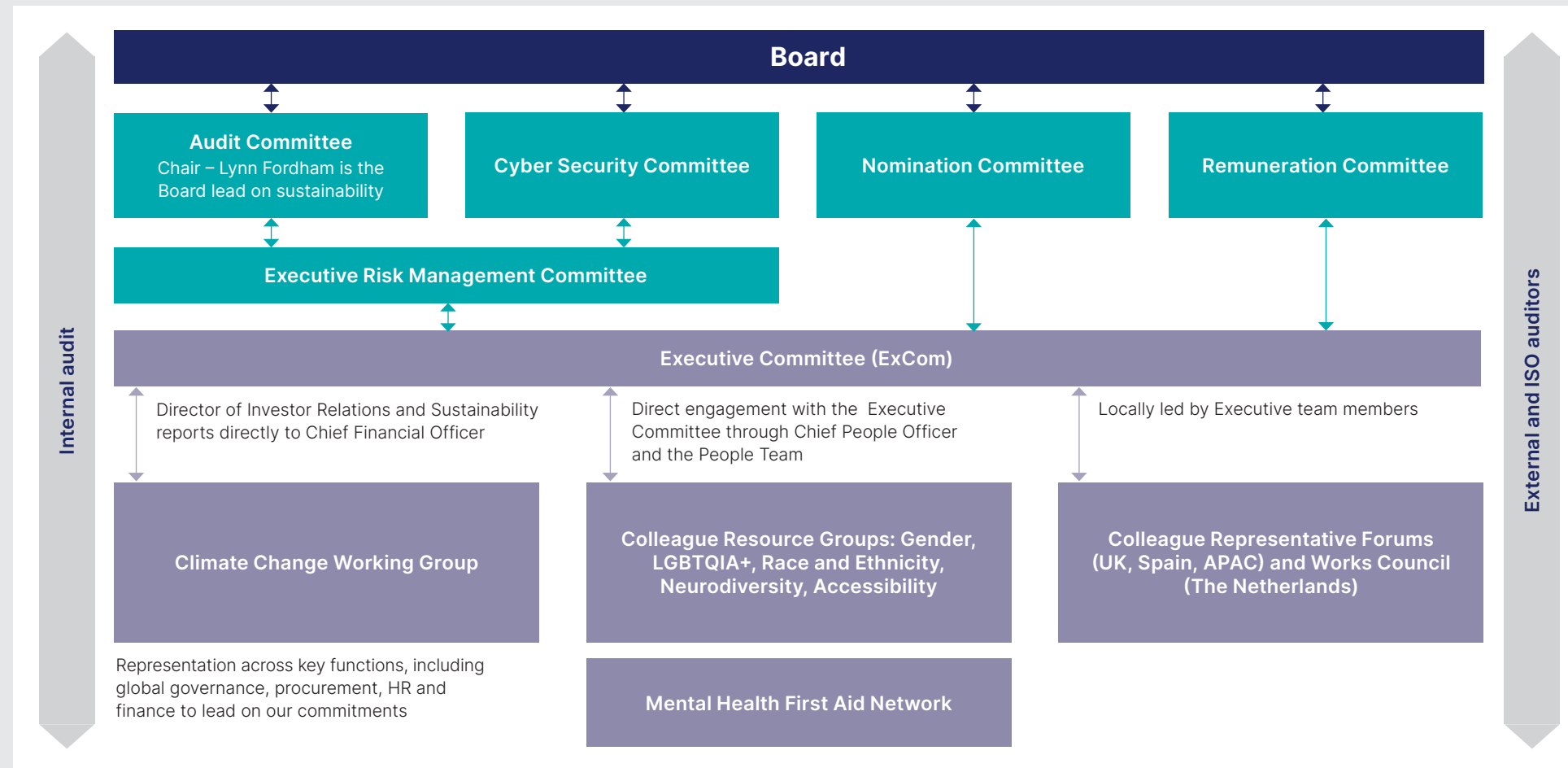
**Wayne Scott**

Regulatory Compliance Solutions Lead



# Oversight and governance

We integrate oversight and governance into our core operations. Our dedicated frameworks ensure sustainable practices are embedded into our everyday decision making, creating long-term value for all stakeholders.





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