

SASB Standards Report - Sustainability

This is the first year that NSC has developed a Corporate Social Responsibility/Sustainability Report under the SASB standards for the financial year 2020. We will continuously strive to improve our processes and reporting mechanisms over the coming years. We have chosen to adhere to the SASB standards for Software and IT Services as they provide industry specific guidance to enable the identification of environmental, social, and governance (ESG) issues most relevant to our industry.

September 2021





NSC, as experts in IT networks, logistics, infrastructure and service delivery, has a policy to comply with all international and regional Environmental Legislation and best practice appropriate to our business. This applies to all those who are employed within the company or who are protected by its undertakings.

It is our policy to do all that is reasonably practicable to:

- Reduce the level of energy consumption and obtain utility and hardware supplies from environmentally friendly providers and those who use renewable energy sources;
- Recycle equipment, waste products and redundant items, and reduce the consumption of consumables;
- Use, store, control and dispose of hazardous materials in line with best environmental practices;
- Reduce travel and off-set our air travel carbon emissions; and
- Purchase items manufactured or produced from sustainable sources.

In particular, it is our policy to:

- Obtain services, equipment and power from providers who are committed to environmental protection;
- Aim to prevent or reduce pollution and actively pursue reduction in the use of substances, processes and procedures that adversely affect the environment;
- Counteract our air travel carbon emissions through the purchase of carbon credits;
- Purchase supplies from providers who are committed to environmental protection thereby producing items for NSC from sustainable sources;
- Consult with employees on matters that may affect them related to environmental control;
- Continually strive to improve our environmental performance by setting annual targets and reviewing our objectives and measuring the progress; and
- Carry out an annual review and update of our policies and other environmental control systems employed.

Employees are also invited to participate in our environmental initiatives and are asked to co-operate in the operation of our policy and make a positive contribution to environmental management by making themselves aware of the firm's environmental policy and complying with the management system and control measures in place.

- We accept responsibility for the harmful effects its operations have on both the local and global environment and are committed to reducing them.
- We will measure our impact on the environment and set targets for ongoing improvement.
- We will comply with all relevant environmental legislation.
- We will implement a training program for our staff to raise awareness of environmental issues and enlist their support in improving our performance.
- We will encourage the adoption of similar principles by our suppliers.
- We are committed to leading the industry in minimising the impact of its activities on the environment.

The key points of our strategy to achieve this are:

- Minimise waste by evaluating operations and ensuring they are as efficient as possible.
- Minimise toxic emissions through the selection and use of its fleet and the source of its power requirement.
- Actively promote recycling both internally and amongst its customers and suppliers.
- Source and promote a product range to minimise the environmental impact of both production and distribution.
- Meet or exceed all the environmental legislation that relates to the Company.
- Use an accredited program to offset the greenhouse gas emissions generated by our activities.

We strongly believe that businesses are responsible for achieving good environmental practice and operating in a sustainable manner. We are therefore committed to reducing our environmental impact and continually improving our environmental performance as an integral and fundamental part of our business strategy and operating methods, and it is our priority to encourage our customers, suppliers and all business associates to do the same. Not only is this sound commercial sense for all; it is also a matter of delivering on our duty of care towards future generations.

Our policy is to:

- Wholly support and comply with or exceed the requirements of current environmental legislation and codes of practice.
- Minimise our waste and then reuse or recycle as much of it as possible.
- Minimise energy usage in our buildings and processes in order to conserve supplies, and minimise our consumption of natural resources, especially where they are non-renewable.
- Apply the principles of continuous improvement in respect of air, water, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community.
- purchase products and services that do the least damage to the environment and encourage others to do the same.
- Assess the environmental impact of any new processes or products we intend to introduce in advance.
- Ensure that all employees understand our environmental policy and conform to the high standards it requires.
- Address complaints about any breach of our policy promptly and to the satisfaction of all concerned.
- Update our policy annually in consultation with staff, associates and customers.

We are 100% committed to reducing our impact on the environment. Over the next 5 years we will strive to improve our environmental performance over time and to initiate additional projects and activities that will further reduce our impacts on the environment. Our commitment to the environment extends to our customers, our staff, and the community in which we operate. In addition to the above, we are committed to:

- Investing in carbon offsetting (purchasing carbon credits);
- Reducing the number of physical offices and accommodate working from home;

- Preventing pollution whenever possible;
- Training all of our staff on our environmental program and empower them to contribute and participate;
- Communicating our environmental commitment and efforts to our customers, staff, and our community; and
- Continually improve over time by striving to measure our environmental impacts and by setting goals to reduce these impacts each year.

TC-SI-130a.1

For our first report, we have decided to include the below offices as they have been identified as our key offices hosting the largest number of employees, and are the material contributors of our carbon footprint. We have not included water consumption as part of our disclosure as this usage was deemed to be immaterial.

Energy Consumption Per Office

1 London Bridge	FY20
Total Energy Consumed	197,263 (KWH) 710 (GJ)
Percentage Grid Electricity	100%
Percentage Renewable	0%

Barcelona	FY20
Total Energy Consumed	53,852 (KWH) 194 (GJ)
Percentage Grid Electricity	100%
Percentage Renewable	0%

South Africa	FY20
Total Energy Consumed	40,767 (KWH) 147 (GJ)
Percentage Grid Electricity	100%
Percentage Renewable	0%

India	FY20
Total Energy Consumed	51,654 (KWH) 147 (GJ)
Percentage Grid Electricity	100%
Percentage Renewable	0%

Hungary	FY20
Total Energy Consumed	47,767 (KWH) 172 (GJ)
Percentage Grid Electricity	100%
Percentage Renewable	0%

Frankfurt	FY20
Total Energy Consumed	7,260 (KWH) 172 (GJ)
Percentage Grid Electricity	100%
Percentage Renewable	0%

Mason, Ohio	FY20
Total Energy Consumed	477,675 (KWH)* 1720 (GJ)
Percentage Grid Electricity	100%
Percentage Renewable	0%

^{*}The energy consumption figures above show the energy consumption of the entire building (six floors), of which, NSC operate in only one floor. We are consistently working with landlords to explore strategic avenues to lower energy usage. The energy consumption of the entire building is 2,866,050 (KWh) however, as NSC operates in only one floor, we have therefore taken 1/6 of the total as our energy consumption.



2. Data Privacy & Freedom of Expression



TC-SI-220a.1

As a global operating company, we process the personal data of our employees, customers, suppliers, and business partners. We take responsibility for handling data entrusted to us with care, and we continue to enhance our data protection measures to fulfil our responsibility. The overall responsibility for data protection on the NSC corporate level lies within the responsible management Board member for Legal, Compliance and Human Resources.

NSC has in place various policies and procedures in relation to Data Protection and data handling, which include:

- Data Protection and Privacy Standards
- Data Retention Policy
- Supplier Code of Conduct
- GDPR contract addendums
- GDPR training

- Intercompany Data Processing Agreement
- Internal staff privacy notice
- External customer privacy notice
- Applicant privacy notice

Data Protection is a core task for us, and we therefore constantly work on developing our data protection management systems to tackle new challenges. Operational activities in the area of data protection management are the responsibility of the functional departments. The functional departments are supported by basic processes of our data management systems. In addition, selected processes are also supported by the compliance management systems, such as general risk assessments or investigation of possible data protection violations. We continuously work to fulfil the requirements of the GDPR and other applicable national regulations.

NSC believes that organisations must seriously consider privacy and data protection at the design phase of any system, service, product or process and then throughout the lifecycle, including when:

- building new IT systems to store or access personal data;
- complying with regulatory or contractual requirements;
- developing internal policies or strategies with privacy implications;
- collaborating with an external party that involves data sharing.

All our employees should endeavour to minimise the collection, processing, and transfer of personal data wherever possible, and adopt a 'privacy-first' approach.

Our primary objective is to ensure that we develop, maintain and follow processes which reduce the risk of unauthorised disclosure or processing of personal data. Our Privacy standard sets out how the company seeks to protect personal data and ensure staff understand the rules governing their use of personal data to which they have access in the course of their work. We recognise that the correct and lawful treatment of Personal Data will engender confidence in the organisation and will provide for successful business operations. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously at all times.

2. Data Privacy & Freedom of Expression



All employees have the possibility to report potential violations of data protection regulations or internal guidelines via existing whistleblowing systems or dedicated e-mail addresses. We take all reports on potential violations as an opportunity to clarify the case as quickly as possible and to review and adjust our company processes where needed. If necessary, we inform affected persons about possible data protection violations promptly and in accordance with legal requirements.

We give high priority to ensuring an appropriate level of data protection in all international data transfers as defined by the GDPR. NSC only transfers data to third countries outside the European Union based on a potential adequacy decision of the European Commission, generally recognised certifications, or other legal safeguards. To this end, we conclude additional specific agreements on data processing with data recipients besides the regular commercial contracts, and our intercompany data processing agreement allows us to share data between NSC companies operating inside and outside of the EEA. We train employees on current requirements and threats in relation to data protection and data security. The training ensures that employees responsible for data processing activities are aware of current legal and internal requirements. We inform new employees about confidentiality and handling sensitive data when they start work and commit them to secrecy.

Our Privacy Policy can be located on our website.

	2018	2019	2020	2021
TC-SI-220a.2 – Number of users whose information is used for secondary purposes.	0 – We only process personal data in line with the original purpose for which it was collected.	0 – We only process personal data in line with the original purpose for which it was collected.	0 – We only process personal data in line with the original purpose for which it was collected.	0 – We only process personal data in line with the original purpose for which it was collected.
TC-SI-220a.3 – Total amount of monetary losses as a result of legal proceedings associated with user privacy.	£0	£0	£0	£0
TC-SI-220a.4 –(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure.	(1) O (2) O (3) O%			

2. Data Privacy & Freedom of Expression



TC-SI-220a.5 - List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring.

We do not currently include this topic as part of our internal group reporting by subsidiaries, but we do operate within the many global regulations that surround trading activities and the import and export of products, services and technology. We abide by all laws and regulations in each jurisdiction.



3. Data Security



	2018	2019	2020	2021
TC-SI-230a.1 – (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected.	1) O	1) O	(1) O	1) O
	(2) O%	(2) O%	(2) O%	(2) O%
	(3) O	(3) O	(3) O	(3) O

TC-SI-230a.2

NSC's approach to managing data security risk is both technical and organisational. NSC has identified a number of key risk areas, which are examined and checked including the:

- misuse of data;
- accidental or intentional dissemination of data;
- loss, theft or compromise of the data/or information;
- incorrect data being used for internal or external purposes;
- and unauthorised access of equipment and/or facilities.

As a result, we have developed and manage a number of key controls that enable data security risk to be controlled and addressed as far as possible. This includes:

- maintenance of data protection standards;
- physical security measures and remote management devices;
- data protection awareness training;
- security procedures and protocols;
- operation of cloud-based system architecture with minimal onsite data storage; and
- annual security assessments

We entirely recognise the obligations that we have towards individuals and the organisations with which it works with regard to the security of information. As such, not only do we comply with the ISO 27001 certification, we also operate a cohesive global breach management and response function to assess, handle and address any data security breaches that arise.

This function is overseen by the Group Chief Financial Officer, the breach management function, which consists of representatives from IT, Operations, and Legal units to be able to manage the assessment of business or client impact, risk containment and remediation, communication and where required, regulatory notification.

3. Data Security



We follow a very thorough information security and data protection strategy that influences a number of technical and procedural controls that underpin how we create, transmit, process, and store types of data. These controls and approaches are documented in our information security policies that cover a range of mitigations and control areas included but not limited to:

- training and awareness;
- acceptable use;
- access management;
- data loss prevention;
- data handling, retention and protection;
- encryption;
- intrusion detection and prevention; and
- physical and environmental security.





% of employees in leadership positions (director or above in the USA)		
Gender	2021	
Male	85%*	
Female	15%*	
Age		
Under 30	38%*	
30-50	54%*	
Over 50	8%*	
EEO-1		
Black or African American	N/A	
Hispanic or Latino	N/A	
Asian	N/A	
White	N/A	
Other	N/A	
Two or More	N/A	
Not disclosed/ available	N/A	

% of employees in non-leadership positions (USA)		
Gender	2021	
Male	86%*	
Female	14%*	
Age		
Under 30	10%*	
30-50	50%*	
Over 50	40%*	
EEO-1		
Black or African American	N/A	
Hispanic or Latino	N/A	
Asian	N/A	
White	N/A	
Other	N/A	
Two or More	N/A	
Not disclosed/ available	N/A	

^{*}Figures have been rounded to the nearest whole number.



% of employees in leadership positions (director or above) Non-USA		
Gender	2021	
Male	68%*	
Female	32%*	
Age		
Under 30	35%*	
30-50	59%*	
Over 50	6%*	
Minority Groups		
Minority	N/A	
Non-minority	N/A	

•	% of employees in non-leadership positions (below director) Non-USA	
Gender	2021	
Male	75%*	
Female	25%*	
Age		
Under 30	13.24%	
30-50	60.36%	
Over 50	26.4%	
Minority Groups		
Minority	N/A	
Non-minority	N/A	

^{*}Figures have been rounded to the nearest whole number.

Human Rights

At NSC, we are committed to developing innovative technology solutions that not only solve our clients' challenges, but also help improve the lives of people around the world. We believe that long-term relationships are built on honesty, integrity and acting ethically. Respect for human rights plays an important role in maintaining these foundational principles.

NSC is committed to upholding human rights and eliminating discriminatory practices, seeking to enable employees to do their best work by embracing and valuing each individual's unique combination of talents, experiences and perspectives. NSC's Global Human Rights Policy elaborates on the requirement in its Global Code of Conduct to treat with dignity, fairness and respect its employees, those with whom it does business, and those living in communities affected by its activities. NSC expects its employees and representatives to be an example of its commitment to human rights at all times.



Purpose and Scope

This Global Human Rights section emphasises NSC's commitment to human rights as a core element of the way we do business. It helps ensure that employees engaged in company business understand their responsibility for upholding human rights and equality in the workplace, and supports the creation and maintenance of a work culture that protects the rights of children, prohibits forced labour, and supports equality, freedom of association and other human rights.

Definitions

Child Labour. Labour undertaken by any person who is either (1) younger than 16, or (2) younger than the minimum age required for the employment under applicable law.

Collective Bargaining. A process by which employers or their organisations, and representatives designated by the workers, discuss and negotiate their relations, particularly the terms and conditions of work, to reach mutually acceptable collective agreements.

Forced or Compulsory Labour. Work or service that is coerced or imposed with little or no freedom of choice, or that which deprives a worker of a genuine possibility of terminating his or her employment without penalty or the threat of penalty, including deliberate withholding or non-payment of wages.

Free Association. The forming of a group, political alliance, or other organisation without any external restriction, the joining of groups by workers and employers for the promotion and defence of occupational interests and matters.

Interns and Work Experience Employees. Individuals working on paid or unpaid assignments to gain experience that will be beneficial for their future careers.

Our Requirements

Anti-Bullying

NSC operates a strict Anti-Bullying and Harassment Policy that supports the rights of all employees to conduct their work without fear of judgement, abuse (verbal or otherwise) or any other form of bullying in the workplace.

Child Labour

NSC prohibits all forms of Child Labour as defined in this Section. When employing employees under the age of 18, managers must comply with all legal requirements and NSC policies, including limitations on minimum hiring age, and hours and tasks performed by these employees, to ensure any work performed does not hamper the child's education, health, safety, and mental or physical development.



Equality and Non-Discriminatory Practices

All employees are offered equal opportunities to develop knowledge, skills and competencies relevant to the company's mission through inclusion, equality and accessibility. NSC employees are required to uphold the elimination of discriminatory practices in the workplace as outlined in our Equal Opportunity and Diversity Policy. Additionally, all NSC employees are expected to uphold practices that focus on merit and the ability to perform work, as laid out in our internal recruitment policies and Career Development Policy. NSC's talent management process treats all employees fairly, including where an employee's circumstances change during their employment. NSC promotes, protects and helps ensure the full and equal enjoyment of human rights by all persons, including those with disabilities.

Forced or Compulsory Labour

NSC will not make use of any form of forced or compulsory labour at any time for any purpose. Wages will be paid regularly and according to all NSC requirements and applicable laws. It is prohibited for employees to instruct or permit anyone to complete work for NSC that is intentionally not compensated. NSC will comply with the provisions of the UK Modern Slavery Act 2015 where applicable and will take adequate steps to ensure that human trafficking and slavery does not occur in its organisation and supply chain.

Interns and Work Experience Employees

All employees completing an internship or work experience at NSC are provided a buddy or mentor, are offered additional support and the framework for each position complies with the relevant laws and minimum working wage requirements.

Free Association and Participation in Collective Bargaining

NSC upholds employees' rights to engage in free association and respects its employees' rights to participate in a collective bargaining process should they so choose. NSC supports open and direct communication between managers and employees as an effective way to work together and resolve differences.

Recruitment

NSC promotes and strictly adheres to an open recruitment policy where applicants are assessed on their skills, experience and ability, and not discriminated against on the basis of protected characteristics such as ethnicity or disability. We welcome all applicants from all walks of life and pride ourselves on our diverse and talented workforce.



Employee Responsibilities

All employees are responsible for supporting human rights in the work environment. It is every employee's responsibility to:

- Understand and uphold NSC's Global Human Rights Policy.
- Contribute to a positive experience at NSC, seeking to promote principles of inclusion, equality and accessibility to employees, customers and stakeholders, irrespective of religion, ethnicity, sexual orientation, sex, disability or background.
- Treat each other with respect and decency.
- Foster free, direct and open communication among all employees.
- Raise awareness of any behaviours or business situations involving NSC that may compromise the company's values relating to human rights.
- Encourage each other to be more openly accepting and non-judgemental and to work together, embracing each other's individuality.
- Report actual or potential violations of this Policy to their line manager, the Board, or the HR department.

The global expansion of NSCs corporate activities has meant growing diversification of not only our customers but also our employees. Work and lifestyle choices are changing, driven by demographic changes such as an aging population and urbanisation. We believe that for employees to work in a worry-free, self-initiated manner, they need to be able to pursue their careers regardless of gender, nationality or other factors and at the same time choose from among various workstyles to suit their particular stage of life. Skill development programs are another essential part of making the workplace attractive to employees. We believe that diversity and inclusion are a source of competitiveness for the company. By having employees from a range of backgrounds work together while respecting one another's different values, new concepts and ways of thinking are born and even greater value and creative solutions are produced, leading to even better business results. In order to meet the diverse needs of customers around the world and to provide the revolutionary products and services that come about when each employee is highly motivated, we have made diversity and inclusion part of our corporate strategy and are actively promoting this in all workplaces.

In order to promote diversity and inclusion across our global operations, policies are created. We then put in place local initiatives based on the specialist knowledge needed for their implementation. We aim to be a truly inclusive company with a diverse workforce, in which individual employees can demonstrate their potential to the fullest. We promote diversity and inclusion based on three approaches: building representational diversity (what we can see and count), fostering interactional diversity (the capacity to engage diversity effectively), and committing to structural diversity (how an organization or institution enacts this commitment).



Representational Diversity	Interactional Diversity	Structural Diversity
Bring a more diverse set of people. Invite and include Enable Engage and invest	Increase the capacity of diverse individuals to interact in a manner that actualises the benefits of diversity. Educate and train Motivate Engage and discuss Empower and ally	Reflect a commitment to diversity in practice, policy, and governance throughout the organisation. Provide focused programming and initiatives Share power Infuse DEI everywhere Evaluate efforts Reward and incentivise Network Invest in long term and interconnected ways



5. Intellectual Property Protection

& Competitive Behaviour



TC-SI-520a.1

Monetary losses associated with anti-competitive behaviour	FY19	FY20	FY21
	£0	£0	£0

Figures show the total amount of monetary losses it incurred during the reporting period because of legal proceedings associated with anti-competitive behaviour such as those related to enforcement of laws and regulations on price fixing, anti-trust behaviour (e.g., exclusivity contracts), patent misuse, or network effects and bundling of services and products to limit competition. This includes all monetary liabilities to the opposing party or to others (whether as the result of settlement or verdict after trial or otherwise), including fines and other monetary liabilities incurred during the reporting period as a result of civil actions (e.g., civil judgments or settlements), regulatory proceedings (e.g., penalties, disgorgement, or restitution), and criminal actions (e.g., criminal judgment, penalties, or restitution) brought by any entity (e.g., governmental, business, or individual).



6. Managing Systemic Risks from Technology Disruptions



Performance issues and disruptions (outages) are viewed through two distinct lenses. First, as a service, as we monitor outages for customers as a service (i.e. downtime associated with a given product owned by a third-party). Second, are outages we are directly accountable for and that are associated with services we provide.

In both instances, we actively monitor for outages and have dedicated customer support available for manually reported disruptions not already identified by our proactive monitoring. While all outages are important, we have formalised processes in place to prioritise and address issues based on priority. We actively monitor our responsiveness and overall process to enable efficient and effective solutions for future outages.

TC-SI-550a.1 – Customer as a Service	
Number of:	
(1) performance issues and	(1) O
(2) service disruptions;	(2) 0
(3) total customer downtime.	(3) 0

TC-SI-550a.1 – Directly Accountable	
Number of:	
(1) performance issues and	(1) O
(2) service disruptions;	(2) 0
(3) total customer downtime.	(3) 0

TC-SI-550a.2

NSC is committed to safeguarding our co-workers and maintaining a resilient enterprise for our customers. We have established catastrophe management and business continuity as a top priority for the organisations.

We have a dedicated business continuity plan and a management team who are responsible for the administration and overall management of the program. The team is managed by the Group Chief Financial Officer.

We also include policies and actionable procedures for key stakeholders to follow during any business interruption. Supporting the programme is a risk management and mass notification tools that are utilised to activate plans and immediately notify team members, customers, and key suppliers.

6. Managing Systemic Risks from Technology Disruptions



Leveraging strategies such as redundant IT systems, alternate office space, and recovery services, we have developed robust plans to ensure the continuity of our operations and support we provide to our customers. Business interruptions are addressed in the plans include, but are not limited to:

- Power Outage
- Fire
- Infectious Diseases
- Workplace Violence
- IT Infrastructure Failures

- Severe Weather
- Civil Disturbances
- Cyber Attacks
- Explosions

We assess and perform risk-based due diligence on third-party service providers' resiliency and ability to continue to provide the services during an event. As part of that assessment and due diligence, we evaluate vendors and supplier's continuity and crisis management plans and maturity levels, and all plans must meet our standards for continuity.

Our business continuity plan is available upon request.



7. Activity Metrics



Certain topic-related metrics and activity metrics within the Software & IT Services industry SASB standard were deemed to be immaterial and (or) not applicable to NSC and were therefore excluded in our disclosure. These are/have been marked as "immaterial".

Code	Description	Justification
TC-SI-130a.2	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Immaterial to NSC
TC-SI-000.A	(1) Number of licenses or subscriptions, (2) percentage cloud-based.	(1) User licensing: 2221 seats, which is a monthly subscription service.
		Server licensing: 192 CPU Cores (perpetual license).
TC-SI-000.B	(1) Data processing capacity, (2) percentage outsourced	NA - we are a B2B organisation and do not process or store personal information outside of this conduct.
TC-SI-000.C	(1) Amount of data storage, (2) percentage outsourced	NA - we are a B2B organisation and do not process or store personal information outside of this conduct.

End of document

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