

Modern Slavery Act Transparency Statement
for the financial year 1st November 2019 to 31st October 2020
of NSC Group Plc (company number: 04108244), covering the activities of NSC Group Plc
and its subsidiary, NSC Global Ltd (company number: 03303053)
(together the "Companies" or "NSC")

Introduction and commitment to combating Modern Slavery

NSC Group Plc is a holding company. Its main activity is to invest in and hold shares in other NSC group entities, including NSC Global Ltd.

NSC Global Ltd is the NSC group's main UK operating company. It employs over 200 staff in the UK.

The turnover of both of NSC Group Plc and NSC Global Ltd was above £36m in the Companies' financial year ended 31 October 2020, so they are required to produce a modern slavery transparency statement setting out the steps they have taken to prevent modern slavery in their business and supply chains. This is the fifth financial year for which the Companies have been required to produce a Modern Slavery Act transparency statement.

The guidance issued under section 54(9) of the Modern Slavery Act 2015 states: "Where a parent and one or more subsidiaries in the same group are required to produce a statement, the parent may produce one statement that subsidiaries can use to meet this requirement (provided that the statement fully covers the steps that each of the organisations required to produce a statement have taken in the relevant financial year)."

This statement is of NSC Group Plc and covers the steps taken by both itself and its subsidiary, NSC Global Ltd. It will be used by both NSC Group Plc and NSC Global Ltd.

The Companies share the same policies and standard supplier terms. NSC Global Ltd employs staff, whereas NSC Group Plc does not, so NSC Global Ltd has taken additional steps to prevent modern slavery as a result of its status as an employer.

Modern slavery is a term used to encompass slavery, servitude, forced or compulsory labour, bonded or child labour, and human trafficking. NSC recognises that slavery and human trafficking are serious crimes and human rights violations, which all of us have a responsibility to combat.

NSC strictly prohibits the use of modern slavery and human trafficking in its operations and supply chains and is committed to implementing systems and controls to prevent this. NSC is dedicated to acting ethically and with integrity in all of its business dealings and relationships, and expects that its suppliers will hold their own suppliers to the same high standards.

Business activities of the NSC Group

The NSC group is a multi-national technology services and infrastructure provider that helps international clients solve their challenges across 180 countries. The NSC group has grown consistently since 1998 and the global group now employs over 2,000 staff, with legal entities in 36 countries. NSC's clients are larger organisations that require a capable and trusted partner to solve challenging technical, process and cost concerns efficiently.

NSC's Policies

The **Whistleblowing Policy** (last updated in March 2019) sets out how staff can raise concerns about illegal activity, which would include discovery of instances of slavery or human trafficking, and sets out the protection and support to be provided to whistleblowers.

The **Global Human Rights Policy** (introduced in September 2017 and updated in January 2018) emphasises NSC's commitment to human rights as a core element of the way NSC does business, helps ensure that employees engaged in company business understand their responsibility for upholding human rights and equality within 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. It states "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."

NSC's **Health and Safety Policy** sets out NSC's approach to providing a healthy working environment for staff, contractors and visitors.

NSC operates with a robust set of **recruitment and HR policies** to ensure that all employees know that they can raise concerns about how colleagues are treated, or practices in NSC's business or supply chain, without fear or reprisal.

Steps taken to ensure that slavery and human trafficking is not occurring within NSC's supply chain/supplier terms

- The majority of the Companies' suppliers sign NSC's standard terms and conditions for suppliers, which state that suppliers must comply with all applicable laws.
- NSC's standard purchase terms, available at <https://nscglobal.com/en/purchase-terms/> (last updated in January 2018) state:
 - "6.3 The Supplier shall comply with all applicable laws in its dealings with NSC and agrees to comply with NSC's supplier code of conduct as amended from time to time and, on request, to certify such compliance periodically. Supplier also agrees to permit NSC to audit Supplier's compliance at such times and in such manner as NSC reasonably requests."
 - "6.4 The Supplier 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. In the event of any noncompliance, Supplier will notify NSC immediately."
- The NSC Supplier Code of Conduct (introduced in January 2018) makes clear NSC's commitment to ethical and responsible conduct in all its operations and NSC's expectation that suppliers and subcontractors will share this commitment. This code states "Supplier will not use forced or involuntary labour, including prison, bonded, indentured, or otherwise. Supplier 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. In the event of any non-compliance, Supplier will notify NSC immediately." Suppliers that do not conform to NSC's standards may be disqualified from preferred status and/or have their business relationship with NSC terminated.

- NSC takes a risk-based approach to contracting processes and keeps them under review, considering, where necessary, the need to audit suppliers for their compliance with its Code of Conduct.
- The suppliers who do not sign NSC's standard terms and conditions for suppliers are typically professional service providers such as lawyers and accountants, with whom NSC contracts on the terms in the supplier's engagement letter, and in relation to whom the risk of modern slavery and trafficking is low.

Additional steps taken to ensure that slavery and human trafficking is not occurring within NSC's organisation

- The Global Code of Conduct for Employees (introduced in September 2017) confirms to employees the actions and behaviour expected of them when representing NSC. It states that employees must comply with the letter and spirit of the law, encourages them to report any illegal behaviour they witness, and states that employees who violate the standards will be subject to disciplinary action, including possible dismissal.
- NSC checks that its employees have the right to work in the UK upon commencement of their employment.
- All employees are paid at least the applicable local minimum wage.
- All employees have an employment contract which sets out their salary, main place of work, working hours and notice period.
- Employees are free to give notice to leave the employment of the company for any reason.

NSC does not keep its employees' original documentation such as passports, ID cards or driving licences.

Covid-19

NSC understands that some workers may be more vulnerable to modern slavery as a result of the coronavirus pandemic. NSC has adhered to government guidelines to ensure a Covid-safe working environment and will continue to pay statutory sick pay when required in order to prevent the spread of Covid-19. NSC's policies are available on the Intranet and by email from NSC's HR team, and grievances or concerns can be raised remotely.

Board Approval

This Statement has been reviewed and approved by the board of directors of NSC Group Plc and NSC Global Ltd on 13th April 2021

Signed: 

Name: Yaseen Khan

Title: Director and CEO, NSC Group Plc and NSC Global Ltd

Date: 13th April 2021