

Modern Slavery Act Transparency Statement

for the financial year 1 November 2017 to 31 October 2018

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 whose 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 2018, 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 third 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 is the only company covered by this statement that employs staff, so it 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 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 across 26 regional offices. NSC’s clients are larger organisations that require a capable and trusted partner to solve challenging technical, process and cost concerns efficiently.

Steps taken by to ensure slavery and human trafficking is not occurring within NSC's supply chain – supplier terms – applicable to NSC Group Plc and NSC Global Ltd

- 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://www.nscglobal.com/en/terms-and-conditions-purchase/> (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 non-compliance, 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 of 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.

NSC Policies – applicable to NSC Group Plc and NSC Global Ltd

The following NSC policies support and reinforce NSC's commitment to ensuring there is no modern slavery or human trafficking in its organisation or supply chains.

- **The Whistleblowing Policy (last updated in September 2017)** sets out how staff can raise concerns about illegal activity, and states that a member of staff investigating a disclosure should escalate their concerns if there is any evidence of criminal activity (which would include discovery of instances of slavery or human trafficking).
- **The Anti-Bribery and Corruption Policy (last updated in September 2017)** defines corruption as *"the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government."* The statement encourages employees to take steps to decrease the risk of NSC being complicit in misuse of power, such

as completing risk assessments, maintaining accurate records and putting in place effective monitoring and internal controls. NSC's Anti-Bribery and Corruption Policy also states that employees have a responsibility to speak up in accordance with the whistleblowing policy if they have concerns about wrongdoing.

- **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."

Additional steps taken by NSC Global Ltd to ensure slavery and human trafficking is not occurring within its organisation, in relation to its status as an employer

- **Global Code of Conduct for Employees (introduced in September 2017 and last updated in July 2018)** 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 Global Ltd 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.

Board Approval

This Statement has been reviewed and approved by the board of directors of NSC Group Plc and NSC Global Ltd on 25 March 2019.

Director signature for NSC Group Plc and NSC Global Ltd

Signed: 

Name: Surjit Bangar

Title: Director of NSC Group Plc and NSC Global Ltd
Group CFO

Date: 25 March 2019