

## **Anti- Slavery and Human Trafficking Statement**

This statement is made on behalf of NCC Group plc and its subsidiaries pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement.

NCC Group plc is a public limited company registered in England and Wales (registered number 4627044) and is listed on the London Stock Exchange. The Group has around 1,800 employees and provides Escrow and Assurance Services across the world.

### **Our Approach**

As a company listed on the Main Market of the London Stock Exchange, we always work to the highest ethical standards and comply with all laws, regulations and rules relevant to our business. Our reputation is paramount and we take our Corporate and Social Responsibilities very seriously. We realise that our relationships with those we deal with, whether clients, employees, shareholders, suppliers or the local community, are key to our success and as such we take our obligations and commitments to those people very seriously.

We expect the same high standards from those we work with and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Please click [here](#) to see our Anti-Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships.

Our corporate policies and procedures help to ensure that our Anti-Slavery Policy is complied with in full. In addition we have a clear Open Door Policy which is published on our intranet site so that if there are any genuine concerns about any wrongdoing or breaches of the law these concerns can be raised in confidence without fear of disciplinary action.

We have also introduced new training which is available to all our staff, but made compulsory for those involved in recruiting and sourcing/managing a supply chain so that they are able to identify risk factors, understand the implications and assist us with implementing the Anti-Slavery Policy effectively.

### **Supplier Due Diligence**

Our Approved Supplier due diligence process includes evaluating every new supplier before appointment and then reviewing them after a 6 month period and thereafter annually. Should any suppliers fail to live up to our expectations or be unwilling to make any changes we may cease to engage with them.

As part of the initial assessment process all suppliers are required to complete a questionnaire containing questions on their Information Security Processes, Quality System, Corporate Social Responsibility, Business Continuity Management and their supply chain. In particular they will be required to confirm that no slavery is used in their business and supply chain and that all necessary processes and policies have been put in place to ensure this remains the case.

### **Further Steps**

We are currently reviewing our entire procurement process and will be introducing specific measures to ensure that our obligations under the Act are passed through our supply chain.

These will include reviewing our standard form of contracts to include:-

- warranties that no slavery is used anywhere in the supplier's business or by any of the suppliers in its supply chain and that all necessary processes and policies have been put into place to ensure that this remains the case;
- a contractual right to request compliance-related information and the right to audit suppliers at our discretion; and
- the addition of indemnity provisions and rights to terminate for breach of our Anti-Slavery Policy into our contracts.



Adam Palser (CEO)  
NCC Group plc  
February 2018