

## Netcompany UK Ltd - Modern Slavery Act Transparency Statement for Financial Year Ending 2019

Published September 2020

### Preface by Simon Seymour-Perry, Country Managing Partner of Netcompany UK Ltd

This is Netcompany UK's third published statement regarding our approach to modern slavery and human trafficking. We are committed to high ethical standards in all aspects of our operations. To support this, we seek to have right policies and processes in place to ensure, as far as possible, that we are not directly or indirectly involved in any human rights abuses.

Whilst we will continually look to refine and improve our approach, this statement reflects our established commitment to providing safe and fair working conditions for our 300 plus employees and the way in which we work with our partners and suppliers to ensure responsible and ethical business practices.

**The purpose of this statement is to satisfy part 6 of the Modern Slavery Act and to provide an update on our commitment to ensuring that our supply chains are free from slavery and human trafficking.**

### 1. Organisation's Structure

We are a next generation IT service company delivering business-critical strategic IT projects in the Information Technology and Services sector. We are a part of the Netcompany Group, and our ultimate parent company is Netcompany Group A/S. Netcompany was founded in 2000 and has its headquarters in Copenhagen, Denmark. Netcompany Group A/S has over 2000 employees worldwide and operates in six (6) countries.

Netcompany UK Ltd has three (3) offices in the UK and these are located in London, Leeds and Derby. Our business is organised in to three (3) business units:

1. Application Development;
2. Infrastructure; and
3. Systems Integration.

### Our Supply Chains

Our supply chains include:

- Recruitment agencies and contract IT resources
- Suppliers of IT equipment, software and services
- Professional services from lawyers, consultants, accountant
- Office cleaning and other office management services
- Marketing and other PR services
- Print and promotional material production
- Training organisations and venues

### 2. Our Policies Relating to Slavery and Human Trafficking

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. Our Modern Slavery Act policy reflects our commitment to acting ethically and with

integrity in all our business relationships and through contractual terms we ensure that our suppliers are upheld to the same obligations and high standards so that slavery and human trafficking is not taking place anywhere in our supply chains.

All of our services are underpinned by robust ISO9001:2015 & ISO27001:2013 certified processes and a variety of industry accreditations.

This anti-slavery statement and its practical effectiveness is reinforced by several existing and aligned Netcompany UK Ltd training information and policies, which include:

- Code of Conduct in which we provide the general foundation for how we conduct our business. It declares that board members and employees are obliged to comply with both applicable laws and regulations in the performance of their duties, and in accordance with good business practice, values and ethical guidelines when carrying out their work.
- Anti-bribery and anti-corruption policy to prevent bribery and corruption as well as ensuring compliance with national and international rules. We do not tolerate any bribery or corruption and we condemn it in all forms and we are committed to doing business in compliance with the policy and with integrity.
- Whistle-blower system in which employees, members of the Executive Board and Board of Directors, auditors, lawyers, suppliers and other business partners of the company can report serious offences or suspected serious offences. Reports may be submitted anonymously, and they are investigated by an external law firm.
- Our core values and ethical guidelines that make us a people-oriented workplace with strongly rooted human rights approach. Our expectation of being an inclusive and equality supporting organisation is guided by the United Nations' Declaration of Human Rights. Through our Code of Conduct training, policies and engagement with our employees, we regularly cover key topics of importance to the company and our employees, such as non-discrimination and protection against harassment.
- Through our Code of Conduct and related anti-corruption activities, we support the UN Global Compact anti-corruption tenth principle. Netcompany Group A/S joined the UN Global Compact in January 2013.

### **3. Due Diligence Process in Relation to Slavery and Human Trafficking**

Netcompany UK Ltd is committed to responsible supply chain management and its objective is to comply with applicable laws and regulations and strive for best practice with regard to responsible supply chain management. Netcompany UK Ltd does not tolerate slavery and human trafficking and will not knowingly engage in, or deal or partner with any suppliers who engage in slavery or human trafficking. Netcompany UK Ltd employees are aware of the company's strong stance against slavery and human trafficking.

Netcompany UK Ltd has assessed the risk of slavery and human trafficking in its UK business and the assessment has revealed the risk of modern slavery in our own organisation to be low. Our skilled and agile employees have greater control over their careers, and this significantly reduces the risk of modern slavery. We have a range of employment policies that protect and enhance our employee's experience at work. In compliance with English law, our recruitment teams conduct a right to work check on all new joiners. External resourcing is a potential risk area for Netcompany UK Ltd, although the highly skilled, specialist contractors we engage from time to time are at low risk of modern slavery offences.

We consider the biggest risk of modern slavery to be outside our organisation. Our risk assessment has revealed that the highest potential exposure to slavery and forced labour is likely to be in the following areas:

1. Supply chain – Suppliers of IT equipment, software and services.
2. Maintenance of our buildings – carried out by construction and property maintenance third parties.

Netcompany UK Ltd is committed to ensuring that its suppliers adhere to the highest standards of ethics. Anti-slavery obligations are included in our contracts with suppliers and they are required to confirm that no part of their business operations contradicts these requirements. Any serious violation may lead to termination of the business relationship.

As part of our commitment to identify and eradicate slavery and human trafficking from within our organisation and from those businesses with which we interact, over the past 12 months we have:

- Published a new global policy expressly prohibiting our employees from engaging in or supporting human trafficking, forced labour and child labour in connection with Netcompany UK's activities, including in our supply chains.
- Implemented a new and improved supplier due diligence process. We have enhanced the questions we ask of all suppliers, in relation to human trafficking and slavery, health and safety, the environment, data protection, information security and bribery to ensure we only partner with suppliers who uphold the same ethical principles as us.
- Updated our group wide Environment, Social and Governance (ESG) policy in order to improve our continued commitment to build strong and sustainable societies, successful companies and better lives for all of us.

In 2020 we will continue to strengthen our approach to managing the risk of modern day slavery within our business and supply chains and:

- Report annually on on Netcompany ESG key figures and activities following the guidelines and recommendations from Nasdaq. This includes reporting on the well-being of our employees and any whistle-blower reports made.
- Maintain effective and continued focus on employee awareness of how we expect employees to conduct business responsibly, focussing on treating people fairly and equally.
- Roll out awareness training to our employees.

#### **4. Our Effectiveness in Combating Slavery and Human Trafficking**

In order to assess the effectiveness of the measures we have taken we will continue to review the following key performance indicators:

- The number and nature of incidents reported via our whistle-blowing system.
- The number and nature of major and minor non-compliances reported to the Human Resources.
- The number and nature of incidents reported through our internal incident reporting mechanisms in relation to our suppliers.

In 2019 Netcompany UK Ltd:

- Received no reports of breaches through the whistle-blowing system.
- Has had to take no remedial actions in relation to modern slavery or human trafficking.
- Has received no notifications of violation of the supplier code of conduct by any of our existing suppliers.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Netcompany UK Ltd slavery and human trafficking statement for the financial year ending 31 December 2019.

**This Transparency statement was reviewed and approved by Board of Directors for Netcompany UK Ltd on 22 September 2020.**

**Signed for and on behalf of Netcompany UK Ltd**



**Simon Seymour-Perry**  
**Country Managing Partner of Netcompany UK Ltd**