

## **Modern Slavery Act Transparency Statement**

This Modern Slavery Act Transparency Statement (“Statement”) is made pursuant to the requirements of section 54(1) of the UK Modern Slavery Act 2015 and has been approved by the board of directors of Netcompany UK Limited (“Netcompany”).

Netcompany recognizes the importance of identifying and preventing modern slavery in our business and supply chain. This Statement sets out the steps we have taken to reduce the risk of modern slavery and human trafficking in our business operations and supply chain as of our financial year 2021 ended on 31 December 2021 as well as our future plans for the current year and beyond.

### **Our business**

Netcompany is the 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. The Netcompany Group was founded in 2000 and has its headquarters in Copenhagen, Denmark. Netcompany Group A/S has over 6500 employees worldwide and operates in 17 countries.

### **Our UK operations and supply chain**

Netcompany operates in the UK from 2 offices located in London and Leeds. We employ around 400 employees in the UK, and our UK business is organised into 2 business units (“BU”):

1. Application Development BU; and
2. Infrastructure BU.

Netcompany business is focused on the delivery of IT innovative, socially, and business-critical services and solutions using the pool of its IT skilled personnel. Occasionally, we engage suppliers for the delivery of customer projects, and we always aim to establish a relationship of trust and integrity with all our suppliers, ensuring compliance with applicable laws and regulations. Almost all such suppliers are located in the UK or Denmark.

We also have a small pool of the following suppliers that supply everything used for our operations that is not our services to customers:

- Recruitment agencies and contract IT resources;
- Suppliers of IT equipment and software;
- 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.

All above suppliers are usually located in the UK or Denmark.

### **Our approach**

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 uphold the same obligations and high standards so to prevent modern slavery and human trafficking anywhere in our supply chain.

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

Due to the nature of our IT consultancy business, we consider the risk of modern slavery and human trafficking within our own organisation and our main supply chain to be low. We continuously review and undertake due diligence of such suppliers that may be considered as a high risk for modern slavery (e.g the manufacture of IT equipment and software, property/facility maintenance suppliers and etc).

## **Our Policies**

Netcompany has the following policies which address issues relevant to slavery and human trafficking:

- **Group 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. 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.
- **Netcompany's core values and ethical guidelines set out in Employees Handbook** 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.
- **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. In addition, Netcompany support the UN Global Compact anti-corruption tenth principle. Netcompany Group A/S joined the UN Global Compact in January 2013.
- **Whistle-blower policy and system** in which employees, members of the Executive Board and Board of Directors, auditors, lawyers, suppliers, and other business partners of Netcompany can report serious offences or suspected serious offences. Reports may be submitted anonymously, and they are investigated by an external law firm.
- **Anti-Slavery and Human Trafficking Policy** expressly requiring all our employees to comply with UK Modern Slavery Act 2015 and prohibiting our employees from engaging in or supporting human trafficking, forced labour and child labour in connection with Netcompany activities, including in our supply chains.
- **Group Environment, Social and Governance (ESG) policy** which has been improved last year to demonstrate our continued commitment to building strong and sustainable societies, successful companies, and better lives for all of us, and to strengthen our approach to managing the risk of modern slavery within our business and supply chains.
- **Tax policy** which describes our guidelines to act as a "Good Corporate Citizen" from a tax payment perspective in all and any country Netcompany is doing business in, and that we ensure disclosure of our corporate income taxes paid in each jurisdiction to give transparency into our business and reduce the risk of modern slavery.
- **Diversity & Inclusion policy** which describes our commitment the UN Global Compact and basis human rights of our employees ensuring equal opportunities and a diverse and including workplace.

## **Our Progress to Date**

In 2020 we assisted the charitable organisation 'STOP THE TRAFFIK' with their redevelopment of their application in which enables people across the world to join the fight against human trafficking and modern slavery by enabling users to submit suspicious activity by sending text-based messages and attaching photos and videos to increase the value of each report.

Over the last financial year, we have:

- Continued to apply and raise awareness of the Anti-Slavery and Human Trafficking Policy recently introduced.
- Continued implementation of a new and improved supplier due diligence process and reviewing the areas for further improvement.
- Reviewed and considered any possible improvements to Group policies.
- Published our Tax-, and Diversity & Inclusion Policies.
- Continued to report annually on Netcompany ESG key figures and activities following the guidelines and recommendations from Nasdaq, and in accordance with the updated ESG policy. This includes reporting on the well-being of our employees and any whistle-blower reports made. Our newest ESG report can be found on this link - <https://www.netcompany.com/int/esg>.

## **Our future plans**

Over the coming year and beyond we plan to focus on the following areas:

- Continue to report annually Netcompany group wide ESG key figures and activities following the guidelines and recommendations from Nasdaq, and to review any possible improvements to such reporting.
- Continue to maintain effective and continued focus on employee awareness of how we expect employees to conduct business responsibly, focussing on treating people fairly and equally.
- Continue working on developing an employee awareness training and planning a roll out such training to our employees.

Signed by:



**Thomas Johansen**  
Director  
Netcompany UK Limited