

MODERN
SLAVERY
STATEMENT

2023-2024

Foreword



The NEC Software Solutions group* is committed to the sustainable development of our business. This includes putting in place the right governance, policies and processes to help us understand and improve our impact on people and the planet.

We take our responsibilities seriously.

We are committed to ensuring that human trafficking and forced, bonded or compulsory labour have no place in our business or our supply chain. Our directors and senior management are responsible for implementing our controls in this area and for making sure that colleagues have the right resources - including training, investment and confidential reporting channels - to minimise risk wherever we operate.

We are aware that the risk of exploitation is likely to rise during periods of political and economic uncertainty, so we will continue to review our controls and take fast action wherever necessary.

A handwritten signature in black ink, appearing to read 'Tina Whitley'.

Tina Whitley
Chief Executive Officer

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015.

*See page 6 for a list of group companies

About our business

NEC Software Solutions is headquartered in the United Kingdom. We also operate out of India, Canada, Australia, Ireland and New Zealand, but most of our revenues remain UK-derived.

Our headcount is split as follows:

	UK & Ireland	India	ANZ	North America	Israel
Headcount	2394	1278	42	3	3
% of Headcount	64.40%	34.40%	1.1%	0.1%	0.1%

*As at 31st March 2024

We provide software and services in four main sectors:



Public Safety

We provide software to police forces, emergency services and the justice sector, including prison and probation services. We also provide facial recognition technologies to the police and major transport hubs.



Government

We work with government at all levels, providing software and business processing support to collect revenue, pay financial support, streamline regulatory services and manage information effectively.



Healthcare

Our work spans referral management, medical registries and health screening, including managed services for diabetic eye screening and newborn hearing screening in the UK and Ireland.



Housing

Our software helps more than 200 housing providers to improve tenant engagement and manage homes more effectively. Our customers are primarily in the UK but we also support housing providers in Ireland, Canada, New Zealand and Australia.

We also offer cloud hosting and end-to-end service design in all sectors.



Our values

Our business is all about making lives safer, healthier, better managed and mobile, and we do that by living our values. We create an inclusive, engaged and purpose-driven culture with an environment where all colleagues feel valued, heard and have a meaningful sense of belonging.

About our supply chain

We source components and services to support our operations and global companies make up the bulk of our supply chain.

We recognise that the level of management control required for the review of any imports from sources from outside of the UK and EU is potentially higher than that from within, as the former can be more at risk of slavery and/or human trafficking issues. We map our supply chain to assess product or geographical risks of modern slavery and human trafficking and will perform additional checks on suppliers operating in high-risk regions according to The Walk Free Foundations Global Slavery Index.

However, most of our suppliers for our operations outside the EU are contracted centrally (and are subject to the same controls we set out below). Furthermore, the main provider of services from India is our sister company, NEC Software Solutions India, which is part of the same corporate reporting structure.

Policy and action

We will not support or deal with any business that we know to be involved in slavery or human trafficking and we comply with internationally recognised standards on human rights, the principles of the UN Global Compact and the elimination of child labour.

The risk of modern slavery and human trafficking within our group and our supply chain is assessed by our compliance and risk team prioritising critical / high risk suppliers and all new vendors. We also ensure our responsibilities in this area are communicated effectively and transparently among our colleagues and partners.

Regarding our supply chain, our actions include:

- ✓ Taking steps to ensure that each new supplier confirm the controls undertaken by it to combat slavery and human trafficking in its organisation and supply chain, before that supplier is approved on our systems.
- ✓ Using a risk-based approach, taking steps to ensure that we monitor and audit existing suppliers, including verification of the controls undertaken to combat modern slavery.
- ✓ Including in supplier contracts, where possible, appropriate provisions around compliance with the Modern Slavery Act 2015, equivalent legislation and associated policies.

In addition, we have a set of internal supporting policies in place, to protect against the risks of slavery and human trafficking.

Whistleblowing Policy

We encourage all our employees, customers and partners to report any concerns related to our direct activities or to our supply chains. This includes any circumstances that might give rise to concerns relating to modern slavery or human trafficking within NEC or NEC suppliers.

Equality, Diversity and Dignity Policy

NEC aims to be an employer of choice, for people from different backgrounds promoting respect for the individual and equality of opportunity. We promote a culture of openness, fairness and respect, promoting and protecting everyone's human rights. We are committed to eliminating discrimination and encouraging diversity.

Safeguarding Policy

Sets out our commitment to safeguarding our colleagues and any other adults or children we encounter at work. We provide colleagues with a process to manage any potential safeguarding concerns and provide a framework for the company to effectively handle any concerns raised.

Recruitment Policy

We employ a team of experienced recruitment professionals responsible for providing a comprehensive range of solutions to our permanent and fixed-term recruitment needs. For temporary and contract recruitment needs our arrangements include a managed service agreement with a supplier with the right controls to combat slavery and human trafficking.

Annual Compliance Training

Policies are made available to all employees, and all employees take compliance training both as part of their induction process and annually. This online training serves as a reminder of the significance of the work we do and the importance of following company policy. Modules on Equality, Diversity and Dignity remind us about our responsibilities with regards to slavery and human trafficking. Completion of the training is mandatory and is audited across the business.

As part of the wider NEC group, we also adhere to the NEC Code of Conduct, which promotes ethical behaviour in all our business dealings.

Effectiveness

NEC recognises that its actions to combat modern slavery and human trafficking is an evolving process. We use the following Key Performance Indicators (KPIs) to measure the effectiveness of the steps we have taken:

KPI	FY23/24
Number of modern slavery instances identified within our operations or supply chain	0
% of assessed suppliers in our supply chain that have a modern slavery statement (where required)	100%
% of assessed suppliers that support and confirm compliance with the principles of the Modern Slavery Act 2015 (where required)	100%
% of employees who have completed annual mandatory compliance training	97%

Goals

We will continue to strengthen our risk identification and due diligence measures. We will continue to build capability across the organisation, particularly in procurement roles, so that our employees understand what steps they should be taking to prevent modern slavery in our supply chains.

Application

This statement is made pursuant to section 54 of the Modern Slavery Act 2015.

This statement relates to the following financial year:

- for SSS Public Safety Limited and Secure Solutions USA LLC, from 1 January 2023 to 31 March 2024; and
- for all of the other companies, from 1 April 2023 to 31 March 2024

This statement applies (subject to the section entitled “SSS Public Safety” below) to all members of the NEC Software Solutions group, including the following companies (registered in the UK unless otherwise stated):

- NEC Software Solutions UK Limited
- SSS Public Safety Limited
- Medical Imaging UK Limited
- Digital Healthcare Limited
- We Are Snook Limited
- Rave Technologies (UK) Limited
- MIDRSS Limited (registered in Ireland)
- NEC Software Solutions Canada Limited (registered in Canada)
- NEC Software Solutions ANZ Pty Limited (registered in Australia)
- NEC Software Solutions India Pvt Limited (registered in India)
- Rave Technologies USA Inc (registered in USA)
- Secure Solutions USA LLC (registered in USA)

SSS Public Safety

While this statement does apply to SSS Public Safety Limited (registered in the UK) and Secure Solutions USA LLC (registered in USA), both of which were acquired by the NEC Software Solutions group on 3 January 2022, those companies were independently operated and managed for a portion of the relevant period. During such time those companies adhered to the same principles as set out in this statement, but different processes were followed, and different policies were in place. The internal supporting policies in place included:

- Company Values
- Speak Up policy
- Diversity and Inclusion policy
- Anti-racism, Discrimination, Harassment and Bullying policy
- Human Rights policy
- Procurement - Supplier Charter

For the financial year starting 1 April 2024, each of SSS Public Safety Limited and Secure Solutions USA LLC will be subject to the same processes and policies as the rest of the NEC SWS group.



Tina Whitley
Chief Executive Officer

\Orchestrating a brighter world

NEC

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