

**UN Global Compact
Communication on Progress for NSSLGlobal Limited**

For period 1 January 2021 – 31 December 2021

1. Statement of continued support by the Group Chief Executive Officer:

To our stakeholders:

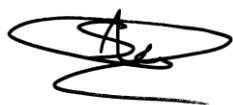
I am pleased to confirm that NSSLGlobal Limited reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations.

We also commit to sharing this information with our stakeholders using our primary channels of communication, including in our annual CSR report to majority shareholder, which, for 2021, is more comprehensive as we seek to measure and improve our impact in this area.

Sincerely yours,

Sally-Anne Ray



Group CEO

24 February 2022

2. Description of Actions

Human Rights

a. Policy and Guidelines

We have in place policies and guidance on the following:

- Health and Safety in the Workplace
- Anti-Bribery, Business Integrity and Corruption
- Bullying and Harassment at Work
- Equality and Diversity
- Modern Slavery Act Fourth Statement

Our policy on Human Rights is summarised as follows:

- We seek to be a fair employer and pride ourselves on being a customer and supplier of integrity. We expect the same of our clients, partners and our supply chain. The Business Integrity Steering Committee has continued to ensure ethical behaviour is at the core of all of our current and future business activities.
- We seek to comply with all applicable law and internationally recognised human rights.
- We acknowledge the part our business has to play in upholding human rights, whether in the workplace or through our suppliers or with our customers, including our legal obligation as regards Modern Slavery Act 2015. Our policy can be found on our website www.nsslglobal.com
- We adhere to the Modern Slavery Act 2015 six principles:
 - Principle 1: Business should support and respect the protection of internationally proclaimed human rights; and
 - Principle 2: Make sure that they are not complicit in human rights abuses.
 - Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
 - Principle 4: The elimination of all forms of forced and compulsory labour;
 - Principle 5: The effective abolition of child labour; and
 - Principle 6: The elimination of discrimination in respect of employment and occupation.

b. How The Company Is Working To Make Sure The Policies And Guidelines Are Followed

We continue to have a top-down commitment to being a fair and responsible employer, customer and supplier.

Human Resources (HR) matters are dealt with by our HR team. Our policies provide for regular reviews and monitoring of our HR activities by our management teams alongside regular induction and review training for all staff.

Our procurement team are also aware of the implications of the Modern Slavery Act in their purchasing decisions. Our supplier questionnaire has been extended to include questions on Slavery and Human Trafficking as well as Business Ethics more generally. As an ongoing activity, key suppliers sign up to adhere to our Business Integrity, Bribery & Corruption Code of Conduct.

We have included Human Rights as a topic for inclusion in our Risk Register, to ensure it is regularly revisited as a topic by the management team as part of its monthly meeting agenda.

The NSSLGlobal Business Integrity Steering Committee (part of the UK Management Team) convenes regularly to discuss the general topic of integrity in the organisation; this includes looking at human rights as well as ethical collaboration in business.

c. Evaluation Of The Results

Our dedicated HR function monitors employee related issues.

NSSLGlobal Business Integrity Steering Committee receive progress reports on a regular basis as part of its agenda and remit. Opportunities for improvement are discussed and if considered appropriate, implementation steps agreed.

d. Expectations/Plans For Future Work

2022 will see us review our stance on Human Rights in the light of UN SDG's and what initiatives geographically, people groups and external partnering opportunities exist which would make sense for NSSLGlobal to be involved in. This activity was paused during 2020 and 2021 owing to Covid-19 and travel restrictions.

We will continue to embed our position on Human Rights and Code of Conduct expectations when building relationships with clients, new commercial partners, resellers and suppliers. Induction training and refresher training for Code of Conduct are conducted regularly and 2021 will see a company-wide mandatory workshop on the Code of Conduct.

Labour Rights and Labour Conditions

a. Policy and Guidelines

In addition to the policies referred to in 2a above, we also have the following policies in place:

- Company Rules
- Disciplinary Rules and Procedures
- Communication Rules and Standards
- Acceptable Use Policy for Company issued IT
- Learning and Development
- Modern Slavery Act Statement
- Grievance
- Data Protection and our response to EU GDPR

We also have the following socially responsible policies (not shared publicly but available on request): Shared Parental Leave; Adoption Policy; and Flexible Working Policy.

Our aim is to ensure that our working practices are in line with relevant legislation and that labour rights of our staff are upheld.

The above-mentioned policies, standards and rules express our position on the following labour rights and labour conditions:

- The right to a legal and fair process as regards raising grievances and disciplinary matters
- Freedom of association and Trade Union Membership
- A zero tolerance policy on all forms of illegal child labour and forced and compulsory labour in our workplaces and those of our suppliers
- Discrimination in all its forms, whether direct or indirect, harassment, victimisation and whether related to gender, sexual orientation, race, nationality, religious, political or philosophical beliefs
- How personal and sensitive personal data of our personnel is retained, processed and used, in line with the provisions of EU GDPR and UK enabling legislation

b. How The Company Is Working To Make Sure The Policies And Guidelines Are Followed

Our work in these areas is ongoing and is met by the HR team, supported by the senior management team. As with our other CSR activities, we have and demonstrate a top-down approach.

We have an open and transparent approach to our HR function, with staff knowing they can speak with any of our management or HR team on matters of concern without fear of reprisal.

All staff sign up to Company Rules and our Policies and Standards.

We also seek to increase awareness of labour rights and human rights both inside the company and our supply chain in our ongoing learning and development activities for our global staff.

We invest time and resources into the NSSLGlobal Engineering Graduate Scheme in support of Science, Technology, Engineering and Maths (STEM); and in offering and promoting equal opportunity across gender and ethnicity as part of our commitment to diversity.

We directly support charitable causes and for 2022 will be focusing on how we can enhance Social Value within our local communities.

We promote a mental awareness culture including: Mental Health Awareness Training for directors and managers; introduction of Mental Health First Aiders; and promotion of Mental Health Awareness via CEO newsletters and notice board announcements (UN Goal 3) and new joiner induction training.

We show our commitment to use local Small and Medium Enterprises (SMEs) within our supply chain including prompt payment rules for all our suppliers but particularly SME's and are committed to our office locations globally in support of local economy and employment.

c. Evaluation Of The Results

Our appraisal process for the ongoing development of our staff provides an opportunity for airing and sharing of issues and concerns, on an individual basis. More informal meetings with staff and their manager regularly takes place during the year.

Our HR team is kept abreast of changes in law and regulation through various subscriptions.

d. Expectations/Plans For Future Work

2022 will see us implementing the work done in previous years which will culminate in the publication of our labour and HR policies into a revised and updated NSSLGlobal Code of Conduct, which will then be adapted for local law requirements (where mandatory) across our locations, pulling together our response and position on:

- Health, Safety and the Environment
- Security
- Employment Practices
- Equality of Opportunity
- Bullying & Harassment
- Use of Company Assets
- Company Property
- Data Protection / Data Security
- Information Management
- Business Communications
- Anti-bribery and Corruption
- Anti-money Laundering
- Conflicts of Interest
- Public Sector Procurement
- Ethical Calls and Bid Management
- Competition and Anti-trust
- Export Control and International Trade

We will continue to review all relevant systems and processes.

Having achieved ISO45001, which is the internationally recognised standard for management systems of Occupational Health and Safety, we will continue to implement best practices in this area proportionate to the NSSLGlobal group and its activities. This certification demonstrates the company's ongoing commitment to the improvement and monitoring of all Occupational Health and Safety matters.

Environmental Impacts

a. Policy and Guidelines

The Management and staff continue to be committed to ensuring that the sustainable development and environmental management are at the core of all activities undertaken by the company. We follow and promote good sustainability practice at all times in order to reduce the environmental impacts of all our activities and to assist our customers and suppliers to do the same. We are committed to improving our sustainable approach to our business activities.

In summary, our Policy states that NSSLGlobal will:

- comply with, and exceed wherever possible, all applicable legislation regulations and codes of practice;
- ensure that all environmental risks are assessed, managed and controlled;
- maintain and develop in a sustainable manner;
- educate, train and motivate employees to carry out their tasks in an environmentally and sustainable manner;
- advise customers and suppliers of our Environmental & Sustainability policy, and to encourage them to adopt sustainable management practices;
- review, annually report, and to continually improve where applicable our environmental and sustainability performance.

b. How The Company Is Working To Make Sure The Policies And Guidelines Are Followed

- i. The Operations and Logistics Team monitor and review our activities against our state policy.
- ii. ISO14001 and ISO9001 accreditation, being management system standards that will assist NSSLGlobal to become more environmentally friendly, reducing our consumption, waste and costs.
- iii. ISO14001 accreditation is helping us focus our efforts towards energy efficiency and providing us with areas to focus on for improvement, one example being LED lighting which was introduced in our head office during 2019.
- iv. NSSLGlobal Waste Management policy aims to reduce the amount of waste being (i) created and (ii) sent to landfill. Offices have recycling and segregation of waste facilities, with recycling being actively encouraged. This is the case whether office waste or electronic or obsolete client equipment.
- v. Continuous improvement meetings involving the management team.
- vi. The following actions have been successfully implemented within the last 12 months to address environmental protection:

- a. Refurbishment of main meeting rooms incorporating energy efficient lighting systems including motion sensors (UN Goal 7)
- b. Introduction of battery recycling points in the office (UN Goal 7)
- c. NSSLGlobal produces a Sustainability Plan and Assessment (separate to the Environmental Management Plan) for each Project that details all of the Sustainability considerations that will be applied to the project including Greening Strategy (Green ICT Lifecycle) (UN Goal 12)
- d. Refurbishment of IT equipment no longer needed by NSSLGlobal staff and donated to local schools. (UN Goal 7 and 12)

c. Evaluation Of The Results

The Operations and Logistics Team continues to monitor and review our activities against our ISO14001 and manage annual external audits.

d. Expectations/Plans For Future Work

The ongoing implementation and continual improvement of our ISO14001 programme in the organisation, including regular business improvement meetings on what actions can be taken by the company to reduce our carbon footprint as well as proactive encouragement of employees, customers and suppliers to be more environmentally focused.

Corruption Avoidance

a. Policy and Guidelines

As a group, NSSLGlobal has a Business Integrity, Bribery and Corruption Code of Conduct. It is based on the UK Bribery Act 2010, but also refers to applicable legislation applying in our other locations. This policy was issued in December 2019 and is being reviewed and updated for 2022. The current version is (and the updated version will be) available on our intranet for staff and all staff have undergone Code of Conduct training and/or briefings. The same Code of Conduct applies to our commercial relationships with customers and suppliers. An updated supplier questionnaire is now available.

Our reseller contracts include provisions on anti-bribery and corruption and we vet all resellers or agents of our services.

In summary, the Code of Conduct explains:

- what would constitute bribery or corruption
- our procedure in the event of a suspected bribe
- how we view facilitation payments and kick-backs, charitable or political donations
- how business entertaining and gifts are managed and the financial limits
- how third party (intermediary) relationships should be taken on and what risk assessment and due diligence questions should be done
- a ZERO tolerance approach to corruption

b. How The Company Is Working To Make Sure The Policies And Guidelines Are Followed

Commitment: We have a top-down commitment to corruption avoidance. All management are required to attend refresher training on an ongoing basis, together with their teams. We have formed a Business Integrity Steering Committee, which meets quarterly to discuss Code of Conduct priorities, new legal developments, case studies of interest, risks and training and development requirements.

Training Focus: Having assessed the activity risk, we have particular focus on our procurement, sales and business development teams. Attendees are registered and their attendance put on their attendance record. The training session ends with those attendees taking an informal group Q&A or team quiz to ensure information has been taken on board. The training sessions are tailored and make clear our approach is for transparency. Feedback has been positive. All relevant teams and individuals have been trained, with regular follow on refresher training. A group-wide refresher workshop planned for H1 2021 will now take place during 2022.

Our position on Business Ethics will also be repeated in a dedicated section in our induction programme for new joiners, with these inductions commencing March onwards.

Resources: We have access, through our advisors, to Ethics resources and best practice materials. Our consideration of whether ISO 37001:2016 Anti-Bribery Management Systems is appropriate for the NSSLGlobal business as a SME business is ongoing.

Due Diligence and Risk Assessment: We continue to evolve and develop additional procedures for how we take on resellers, agents or clients, to ensure our Code of Conduct is followed.

c. Evaluation Of The Results

We have not had any instances of activity which we would view as contrary to our Code of Conduct. The Business Integrity Steering Committee (for UK management team) has quarterly review meetings of the Code of Conduct with senior management team members to ensure we remain relevant and alive to issues arising.

The topic of business ethics is now an agenda item for consideration and reporting both at board and management team level.

d. Expectations/Plans For Future Work

Resources: As mentioned above, TRACE International Certification, ISO 37001:2016 is a possible 'quality mark' we are reviewing.

Training is an ongoing process.

As mentioned above, the Code of Conduct work is ongoing.

NSSLGlobal continues to look for ways to improve and embed good working practices in its day to day activities. We are now also accredited to ISO 27001, Information Security, which we achieved in 2021.

NSSLGlobal achieved ISO44001:2017 (Collaborative Business Relationship Management System) certification. This standard has at its focus trust and integrity and ensuring systems and process to support positive collaborative relationships, of which anti- corruption avoidance is one part. This standard further codifies our approach to anti-corruption best practice.