

## 1 Introduction

This is the Modern Slavery Statement ('the Statement') of NC Limited and its subsidiaries (Northrop) for the financial year ending 30 June 2025.

NC Limited is the parent company which governs the Northrop group of subsidiary companies and sets and approves the Statement for the Group each financial year.

As an Australian-based business, we take our responsibilities regarding the prevention and countering of modern slavery very seriously. Northrop will not tolerate modern slavery in our operations and supply chain and regards it as a serious abuse of a person's freedoms and rights.

We are committed to developing our policies and practices to ensure a strong position according to our risk profile and industry with a proactive focus.

## 2 Northrop's structure, operations and supply chains

Northrop is a multi-disciplinary consulting engineering practice, owned, governed, and managed by our people. Northrop provides professional services in the Australian building and construction industry as engineers, consultants, drafters and advisors with technical specialisations to a diverse range of private and public sector clients.

Northrop has approximately 475 people based in nine offices across Victoria, New South Wales, ACT and Queensland with the majority of our work performed within these four states.

Northrop entities contract with clients to provide consulting services and advice. As such, the supply chain of our business involves minimal procurement of goods and equipment for projects. In addition, Northrop entities typically operate only within Australia.

The supply chain involves procurement of sub-consultants and intangible services – namely computer software and IP licenses – for the delivery of services. This includes the procurement of services overseas. In addition, Northrop contracts with corporate suppliers for the procurement of office-related goods, equipment and services including branded items and PPE. Northrop also engages professional advisors to provide professional services such as employment advice, external lawyers and auditing services.

### NORTHROP POLICIES RELATED TO MODERN SLAVERY

Northrop has a number of policies and procedures governing the appointment of people and working conditions at Northrop to ensure compliance with Australian legislation and prevent modern slavery within our operations. Building on these, Northrop has implemented a modern slavery policy addressing risks within our supply chain. The Modern Slavery policy confirms our commitment to working with clients and suppliers to ensure modern slavery does not exist within our supply chain and sets the expectations and standards required from our people and partners.

Our modern slavery policy also sets out our commitment to continual development, including an annual review of our policy and framework.

## 3 Modern slavery risks in operations and supply chain

Northrop's staff are employed directly by Northrop and engaged under contracts compliant with all applicable Australian legislation. Therefore, the risk of breaches of modern slavery regulations arising from Northrop's project and design consultancy-related services have been assessed as low risk when completed in-house.

While most of Northrop's suppliers are based in Australia (a Tier 1 country per the [Modern Slavery Risk Map](#)) the procurement of engineering and drafting services from overseas suppliers presents a higher risk of modern slavery within our supply chain. Northrop minimise the risk of modern slavery by carrying out a risk assessment of potential suppliers incorporating where the

company is based, the government response to modern slavery, and the internal policies and processes relating to modern slavery. Northrop also include contractual terms for the engagement of engineering and drafting services to require compliance with modern slavery legislation.

There is a potential risk of a breach of modern slavery regulatory requirements from suppliers of goods and services for our offices. This includes our branded products, personal protective equipment, office supplies including furniture and equipment, cleaning, maintenance and catering activities. Northrop has developed a framework to address risks in our supply chain and is currently working with our suppliers to assess the risks associated.

## 4 Risk management

### NORTHROP'S DUE DILIGENCE PROCESSES IN RELATION TO MODERN SLAVERY

Northrop has established a framework to apply due diligence screening to our suppliers of goods and services. Elements which have been implemented include:

- survey of our highest risk suppliers to assess the risk of modern slavery within our supply chain;
- the use of Northrop's Sub-consultancy Agreement which includes clauses to control the reporting of, and responding to any non-compliances in regard to modern slavery legislation; and
- maintenance and review of our sub-consultants register.

Elements of the framework to be implemented this year include:

- expanded distribution of the Modern Slavery Questionnaire to suppliers within the next level of risk;
- configuration of our practice management software to enable tracking and reporting within system;
- collaboration with our suppliers to reduce the risk of modern slavery within our supply chain; and
- training for procurement-related staff at Northrop regarding modern slavery.

Once the framework is established, automated due diligence will be increasingly utilised.

### REMEDIATION

All Australian suppliers must comply with all Australian laws and regulations regarding labour (including child labour and forced/bonded labour), wages and benefits, as well as health, safety (including psychosocial safety), anti-discrimination and sex-based misconduct.

Our international suppliers are expected to comply with the legal requirements of the countries in which they operate while working with Northrop to ensure modern slavery is eliminated within their operations.

Reporting mechanisms for any suspected or potential instances of modern slavery are outlined in our Modern Slavery policy. Alternatively, suspected incidents can be raised anonymously via our feedback form accessed via Nexus, our internal Sharepoint. Reports and concerns can be raised in confidence and all genuine allegations will be investigated taking all due diligence.

All staff have unrestricted access to these reporting mechanisms.

### MODERN SLAVERY AWARENESS TRAINING

Northrop is assessing training platforms for mandatory training for all procurement-related staff to raise awareness regarding modern slavery. While mandatory for procurement-related staff, it is intended that the training will be available to all staff, and all will be encouraged to complete it.

Training will encompass what modern slavery is, what it may look like inside and outside the workplace, and how to recognise it. Further information will be provided to all staff on the actions that Northrop is taking to ensure that our supply chain is free from modern slavery, and how our staff to respond to and report a suspected instance of modern slavery.

As our policies and procedures develop further, our training program will also be developed to reflect this.

## 5 Northrop's assessment of effectiveness

While acknowledging the difficulties that professional services firms face in this space, Northrop has yet to develop measurable metrics to evaluate our risk management effectiveness strategies. In the coming year, Northrop will seek to introduce:

- checks on completion rates of modern slavery assessments;
- development of reporting;
- learning and development training registers for all staff completing the Modern Slavery Online Training module; and
- monitoring and reviewing the actions and awareness of staff with procurement-related roles.

## 6 Northrop's Consultation process

The Statement is led by the General Manager - Operations, reviewed by the Managing Partner and approved by the board of directors of the Northrop Group. The Statement is reviewed and updated annually, then approved by the Northrop Board and formally communicated to and adopted by the board of directors of each operating subsidiary within the Group.

**This statement has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)* and was approved by the Board of Directors of Northrop on 23 October 2025.**



David Field  
Board Chair