

A young woman with dark, curly hair is looking down at her smartphone. She is wearing a blue sleeveless top. The background is a warm orange gradient.

NEC

MODERN
SLAVERY
STATEMENT
AU

2021-2022

\Orchestrating a brighter world

Introduction

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and is published on behalf of NEC Software Solutions ANZ Pty Ltd (referred to as “we” or “our”).

We are a wholly-owned subsidiary within the group ultimately owned by NEC Corporation, a Japanese multinational information technology and electronics corporation, registered in Japan. Further information regarding NEC Corporation’s response to modern slavery can be found here: <https://www.nec.com/en/global/csr/modernslavery/>.

We are group-managed by our shareholder NEC Software Solutions UK Limited, registered in England and Wales. We enclose a copy that company’s Modern Slavery Statement and apply the same practices and principles as far as they relate to Australian law.

About our business

In Australia, we provide software and related services to Governments and public bodies, including for the administration of public housing.

Risk identification and remediation

We have reviewed the potential risk of modern slavery practices across our ANZ operations and supply chain, taking into consideration factors such as sector, industry, product and service type and geographic location.

As a result of the review, we identified some potential low-risk items concerning direct employees and independent contractors. An assessment of these areas revealed that the relevant individuals were compensated at or above industry award rates and had satisfactory working conditions or maintained a high level of autonomy over their working conditions.

We focused our immediate efforts on major vendors as determined by annual spend. Although no obvious risks of modern slavery were identified as part of this process, we acknowledge the need for ongoing diligence and review. In line with our Supplier Management Policy, we have commenced annual questionnaires of our critical and high-risk vendors and, where appropriate, we will also carry out on-site vendor audits.

Where any actual or suspected circumstance of modern slavery is identified, we will promptly seek an explanation from the relevant supplier and, if appropriate, work with the supplier to develop an approved remediation plan. If a remediation plan is not appropriate in the circumstances, the supplier fails to satisfactorily implement the remediation plan, or the remediation plan fails to address the issue, we will review our relationship with the supplier with a view to terminating the contractual relationship and engage alternative suppliers who share a commitment to the eradication of modern slavery.

Risk management and due diligence

To manage the risks of modern slavery in our supply chain we:

- issue our suppliers with a supplier code of conduct; and
- where possible, appropriate provisions around compliance with the Modern Slavery Act 2018 (Cth) and the Fair Work Act 2009 (Cth) are drafted into contracts.

This statement was approved by the Board of Directors.



Tina Whitley
Director



Anthony Hall
Director

A woman with dark, curly hair is looking down at her smartphone. She is wearing a teal-colored sleeveless top. The background is a warm orange gradient. The NEC logo is in the top right corner.

NEC

**MODERN
SLAVERY
STATEMENT
2021-2022**

\Orchestrating a brighter world

Foreward



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	India	Eire	ANZ	North America	Israel
Headcount	1192	1629	119	47	4	3
% of Headcount	53.13%	42.48%	3.01%	1.20%	0.10%	0.08%

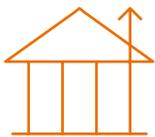
*As at August 2022

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.

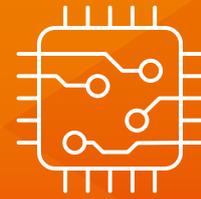
We also offer cloud hosting and end-to-end service design in all sectors.



Inspiring



Involved



Innovative

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 are more at risk of slavery and/or human trafficking issues. We map our supply chain to assess particular 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, the majority of our suppliers for our operations outside of the EU are contracted centrally (and are therefore 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.

With regard to 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 and associated policy.

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 of 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 each individual'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 come into contact with 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 who are 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 as part of their induction process and all colleagues take annual compliance training. 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 of our business and dealings.

Application

This statement relates to the financial year from 1 April 2021 to 31 March 2022, and applies (subject to the section entitled "Exclusion" 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
- i2N Ltd
- Medical Imaging UK Limited
- Digital Healthcare Limited
- Vantage Diagnostics Ltd (not part of the group until June 2021)
- 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)

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

Exclusion

This statement does not apply to either SSS Public Safety Limited (registered in the UK) or Secure Solutions USA LLC (registered in USA), both of which were acquired by the NEC Software Solutions group on 3 January 2022, but which for the time being are independently operated and managed.



Tina Whitley
Chief Executive Officer

\Orchestrating a brighter world

NEC

NEC Software Solutions UK
BizSpace
1st Floor, iMex Centre
575-599 Maxted Rd
Hemel Hempstead
HP2 7DX
United Kingdom

necsws.com