



# Modern Slavery and Human Trafficking Statement 2025

NEC EUROPE LTD

# About this statement

This Modern Slavery and Human Trafficking Statement (the "**Statement**")<sup>1</sup> is published by NEC Europe Ltd and refers to the requirements of Section 54 of the Modern Slavery Act 2015 ("**The Act**").

The Statement covers the organisation structure, business and supply chain of NEC Europe Ltd, its subsidiaries and branch offices, including NEC (UK) Ltd. (collectively "**NEC Europe**", "**the Company**", "**we**", "**us**" or "**our**")<sup>2</sup>.

The Statement outlines the steps that we have taken during the Financial Year that ended 31st March 2025 ("**Reporting Period**") to prevent any form of modern slavery and human trafficking from occurring within our organisation and supply chain.

## NEC Europe

NEC Europe Ltd serves as the regional headquarters of the NEC Group<sup>3</sup> in the United Kingdom and is a wholly owned subsidiary of NEC Corporation.

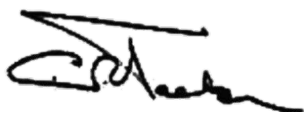
NEC Corporation<sup>4</sup> is a global leader in technology products, services, and integrated solutions established in Japan. The NEC Group comprises a network of companies headed by NEC Corporation, including all NEC entities referenced in this Statement.

The NEC Group promotes IT services, social infrastructure and other businesses based on its purpose "NEC creates the social values of safety, security, fairness and efficiency to promote a more sustainable world where everyone has the chance to reach their full potential".

This Statement was approved by the Board of Directors of NEC Europe Ltd on 30 September 2025.

Signed on the same day

Chris Jackson  
President & CEO  
NEC Europe



<sup>1</sup> We published our first Modern Slavery Statement in 2016 and this is our 10<sup>th</sup> statement.

<sup>2</sup> <https://uk.nec.com/>

<sup>3</sup> For more information on the NEC Group's business, please see: <https://www.nec.com/en/global/about/profile.html>.

<sup>4</sup> <https://www.nec.com/>

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## Ethical leadership and governance oversight

At NEC, Senior Leadership from Sustainability, Procurement, Finance, Legal and Human Resources are central to upholding our commitment to human rights and preventing modern slavery. They lead compliance initiatives and promote ethical standards across the organisation.

Governance is reinforced through quarterly reporting to the Board of Directors, ensuring strategic oversight of human rights risks. Biannual ISO management systems reviews, guided by supplier risk assessments, audit outcomes, and feedback from internal and external stakeholders, support continuous improvement. These mechanisms reflect NEC's zero-tolerance stance on human rights violations and strengthen supplier engagement across our value chain.

The Board of Directors of NEC Europe Ltd reviews and formally approves the Statement, which is signed by the President and CEO of the Company on behalf of the Board.

## NEC Europe Company-Wide commitment to action

Modern slavery and human trafficking remain persistent threats that can affect even the most advanced supply chains. At NEC, we recognise our responsibility to stay vigilant and act with transparency. Our commitment under the UK Modern Slavery Act 2015 goes beyond compliance. We respect human rights and actively identify and address risks across our operations and supply chain. As part of this, we assess whether any areas involve outsourced labour, complex procurement, or rapid innovation that could obscure potential risks.

We recognise that progress in tackling modern slavery is not always linear. We remain committed to report both our achievements and the challenges we face, while taking action to reduce the risk of exploitation.

Through meaningful engagement with our workers, suppliers and stakeholders, we are strengthening our due diligence processes and contributing to the global effort to eliminate modern slavery in all its forms.

## Our approach to progress

We continue to track progress in alignment with the initiatives outlined in our previous Modern Slavery Statements, ensuring consistency and accountability over time.

This year, we introduced new Key Performance Indicators (KPIs) aligned with relevant GRI Standards<sup>5</sup>, specifically GRI 2 (General Disclosures) and GRI 409 (Forced or Compulsory Labor), to strengthen our modern slavery due diligence and enhance transparency in our reporting.

This statement reflects NEC Europe's efforts to align with the principles and recommendations of the 2025 Transparency in Supply Chains (TISC) Guidance.

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<sup>5</sup> <https://www.globalreporting.org/standards>

# Organisation structure and supply chain

## Our organisation

The Statement applies to NEC Europe companies listed in *Figure 1*. Other NEC Group entities may issue separate statements or be covered under the broader Group Statement, as appropriate. Our non-UK operations are based in the European Union. NEC Europe's core operations encompass a broad spectrum of B2B functions, including business development, sales and marketing, customer support, research and development. We serve a diverse client base across both the private and public sectors, including government agencies and local authorities throughout the UK and Europe.

*Figure 1*

In UK	In the European Union
NEC Europe Ltd NEC (UK) Ltd.	NEC Deutschland GmbH; NEC Eastern Europe KFT.; NEC Finland OY; NEC France S.A.S.; NEC Iberica S.L.; NEC Italia S.p.A; NEC Laboratories Europe GmbH; NEC Nederland B.V.; NEC Portugal Telecomunicações e Sistemas, S.A. and NEC Scandinavia AB.

*Figures 2 and 3* outline our organisational structure and strategic customer revenue in relation to human rights and modern slavery disclosures.

*Figure 2*

Company	Principal country of operation <sup>6</sup>	Holding by NEC Europe	Contribution to NEC Europe Group Profit (Adjusted, £m)		% of employees (NEC Europe total)	
			FY23	FY24	FY23	FY24
NEC Europe Ltd	United Kingdom	-	2.6	-6.2	34	33
NEC (UK) Ltd.	United Kingdom	100%	0.3	0.4	5	3
NEC Deutschland GmbH	Germany	100%	7.3	4.2	19	23
NEC Eastern Europe KFT.	Hungary	-	-0.3	0.0	0	0
NEC France S.A.S.	France	100%	1.1	0.1	1	2
NEC Iberica S.L.	Spain	100%	0.7	0.4	13	16
NEC Italia S.p.A	Italy	100%	-0.1	3.8	8	7
NEC Nederland B.V.	Netherlands	100%	1.8	-2.0	13	11
NEC Portugal Telecomunicações e Sistemas, S.A.	Portugal	100%	0.4	0.1	4	3
NEC Scandinavia AB.	Sweden	100%	1.0	1.9	3	3

<sup>6</sup> Fixed Asset Investment in active operation

We monitor the public declarations on human rights and/or modern slavery of our strategic customers.

Figure 3

Top 5 Customers	Headquarters location		% revenue generated for NEC Europe Group (NEC Europe total)		Public declaration on human rights and/or modern slavery	
	FY23	FY24	FY23	FY24	FY23	FY24
Customer A	Germany	Germany	23%	20%	Yes	Yes
Customer B	Norway	Norway	9%	13%	Yes	Yes
Customer C	Germany	Spain	7%	7%	Yes	Yes
Customer D	UK	Germany	6%	5%	Yes	Yes
Customer E	Spain	Germany	4%	4%	Yes	Yes

## Our Supply Chain

We recognise the importance of maintaining ethical and transparent relationships across our supply chain. As such, we are committed to working only with partners who uphold internationally recognised standards on human rights, labour practices, and anti-slavery principles.

Our supply chain is composed of approximately one-third service providers and two-thirds third-party suppliers, collectively referred to as **"technology partners."**

**Among our service providers**, roughly one-third are engaged in professional and administrative functions, including consultancy, advisory, and support services. These partners range from small and medium-sized enterprises to large multinational firms with regional offices across the United Kingdom and the European Economic Area (EEA).

Figure 4 – Activity sectors of our services providers



**Our technology partners** deliver a broad spectrum of software, systems, products, components, and integrated solutions that support our operational and strategic objectives. NEC Corporation, our parent company, manages a global network of technology partners that support multiple NEC Group entities. These shared partners represent approximately 30% of NEC Europe's total annual technology spend and are subject to NEC Group's centralised oversight, which includes supplier vetting, contractual compliance, and adherence to group-wide ethical standards.

NEC Europe retains direct oversight of the remaining 70% of technology partners, referred to as “**regional technology partners**.” We maintain long-term strategic relationships with these partners, many of whom are subject to regular performance reviews and compliance checks. Our top five regional technology partners, each highly reputable, account for 36% of the annual technology spend under our direct management.

While we occasionally distributed goods produced by NEC Group companies or affiliated technology partners, NEC Europe did not engage in the manufacturing or physical assembly of products. Our commercial activities primarily focused on delivering turnkey solutions and tailored services to meet customer requirements.

During the reporting period, NEC Europe did not operate in, or conduct sales to, fragile or conflict-affected regions, areas commonly associated with elevated risks of human rights violations and modern slavery. We continue to strengthen our supply chain governance through enhanced due diligence, supplier engagement, and alignment with internationally recognised human rights standards.

*Figure 5 – Location of our top 5 regional technology partners*

Regional Technology partners Ranked by expenditure (highest to lowest)	Headquarters location		% Contribution to NEC Europe Group Spend (NEC Europe total)	
	FY23	FY24	FY23	FY24
Supplier A	Hungary	Germany	19	12
Supplier B	Taiwan	Taiwan	14	7
Supplier C	Germany	Hungary	13	6
Supplier D	USA	Germany	5	5
Supplier E	USA	UK	4	5

## Policies in relation to slavery and human trafficking

NEC Europe’s efforts to identify and combat modern slavery and human trafficking are integrated into NEC Corporation’s overarching Human Rights agenda, which underpins responsible business practices across the entire NEC Group.

### NEC Group Policies

The NEC Group has placed the respect for human rights as one of the Principles of the NEC Way<sup>7</sup> and in the NEC Group Code of Conduct<sup>8</sup>, which clearly states that each and every NEC Group officer and employee needs to comply with these principles.

In addition, the NEC Group upholds the International Bill of Human Rights, the International Labour

<sup>7</sup> <https://www.nec.com/en/global/about/the-nec-way.html>

<sup>8</sup> [https://www.nec.com/en/global/about/pdf/necway/nec\\_code\\_of\\_conduct.pdf](https://www.nec.com/en/global/about/pdf/necway/nec_code_of_conduct.pdf)

Organization (ILO) Core Labour Standards, the UN Guiding Principles on Business and Human Rights (UNGP), the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, the Ten Principles of the UN Global Compact<sup>9</sup> and other internationally recognised national laws and regulations in the relevant region.

The NEC Group Human Rights Policy<sup>10</sup>, which is applicable to all officers and employees of the NEC Group, including fixed-term contract employees, temporary employees, and part-time employees, states that where national laws in the relevant jurisdiction conflict with internationally recognized human rights, we will seek ways to respect the principles of internationally recognized human rights.

The NEC Group also encourages its suppliers, business partners, and customers to understand this Policy and share its commitment to respecting human rights. Furthermore, suppliers are required to comply with the "NEC Group Procurement Policy"<sup>11</sup> and "Guidelines for Responsible Business Conduct in Supply Chains"<sup>12</sup>.

The NEC Group's Modern Slavery and Human Trafficking Statement can be found here:

<https://www.nec.com/en/global/csr/modernslavery/index.html>

The NEC Group ESG<sup>13</sup> Databook can be found here:

<https://www.nec.com/en/global/sustainability/report/index.html>

## NEC Europe Policies

Aligned with the NEC Group policies referenced above, NEC Europe has implemented a comprehensive framework of procedures and processes that embed human rights principles across all aspects of our operations. These measures apply to all personnel, including permanent, temporary, and agency staff, as well as to our business partners, suppliers, and other relevant third parties.

New policies and policy changes are communicated clearly and consistently through internal channels, including our intranet, compliance communications, office displays, and targeted training sessions, to ensure staff are informed and equipped to uphold our standards.

<b>Responsible business policies</b>	▪ These policies are reviewed annually by Senior Leadership and play a central role in preventing risks related to modern slavery. They cover areas such as ethical procurement, sustainability, workplace safety etc. and support our wider human rights commitments.
<b>Ethical sourcing</b>	▪ Our approach to sourcing is based on the NEC Group Responsible Procurement approach <sup>14</sup> . For us, responsible sourcing includes never participate, knowingly or unknowingly in any form of child, forced or bonded labour and never encourage or be complicit to unethical procurement including through our sourcing practices.

<sup>9</sup> NEC has been a member since 2005. The Ten Principles of the UN Global Compact are a set of universal values that guide businesses in responsible and sustainable practices across four key areas (Human Rights, labour, environment and anti-corruption).

<sup>10</sup> [https://www.nec.com/en/global/csr/pdf/human\\_rights\\_en.pdf](https://www.nec.com/en/global/csr/pdf/human_rights_en.pdf)

<sup>11</sup> <https://www.nec.com/en/global/purchasing/renshiki-a2.html>

<sup>12</sup> [https://www.nec.com/en/global/purchasing/data/en2\\_sc\\_csr\\_guideline\\_4e.pdf](https://www.nec.com/en/global/purchasing/data/en2_sc_csr_guideline_4e.pdf)

<sup>13</sup> ESG: Environmental, Social and Governance

<sup>14</sup> <https://www.nec.com/en/global/purchasing/sustainable.html>



<b>Employment rights &amp; worker protections (relevant key employment provisions)</b>	<p>Our HR policies are designed to uphold and promote human and labour rights across our operations. In relation to modern slavery, we reference the following key principles:</p> <ul style="list-style-type: none"> <li>▪ <i>Freedom of employment:</i> Workers have the right to freely enter and leave employment without coercion or penalty.</li> <li>▪ <i>Freedom of movement:</i> No restrictions are placed on workers' ability to move freely during or outside working hours.</li> <li>▪ <i>Freedom of association:</i> Workers are free to join or form trade unions and to engage in collective bargaining.</li> <li>▪ <i>Prohibition of discrimination:</i> Discrimination based on race, gender, religion, nationality, or any other protected characteristic is strictly prohibited.</li> <li>▪ <i>No child labour:</i> Employment of individuals below the legal working age is strictly prohibited.</li> <li>▪ <i>No forced or compulsory labour:</i> All forms of forced labour, including compulsory overtime, are not permitted.</li> <li>▪ <i>No worker-paid recruitment fees:</i> Recruitment fees paid by workers are prohibited to prevent debt bondage and exploitation.</li> <li>▪ <i>No confiscation of identification documents:</i> Workers' original identification documents must not be withheld or confiscated.</li> <li>▪ <i>No threats or abuse:</i> Violence, harassment, intimidation, or any form of abuse in the workplace is strictly forbidden.</li> <li>▪ <i>Grievance and remediation:</i> Workers have access to grievance mechanisms, compensation, and justice in cases of modern slavery or human rights violations.</li> </ul>
<b>Work-life balance and wellbeing</b>	<ul style="list-style-type: none"> <li>▪ We promote work-life balance through flexible working arrangements and wellbeing initiatives, supporting employees' physical and mental health. Excessive working hours are discouraged.</li> </ul>
<b>Equal opportunity commitment</b>	<ul style="list-style-type: none"> <li>▪ We are committed to the principle of equal opportunity in employment, ensuring fair and non-discriminatory treatment for all personnel. This enables a respectful, inclusive workplace and helps reduce the risk of exploitation.</li> </ul>
<b>Whistleblowing and reporting mechanisms</b>	<ul style="list-style-type: none"> <li>▪ We maintain a confidential whistleblowing program, supported by the independent Safecall service, enabling employees and suppliers to report concerns, including those related to modern slavery.</li> <li>▪ The program is overseen by a senior-level committee and includes clear procedures for investigation, remediation, and protection against retaliation.</li> </ul>

## Due diligence processes

NEC Europe's due diligence process is grounded in the OECD's six-step framework<sup>15</sup> and strengthened through active industry engagement, regulatory monitoring, and peer collaboration. To better assess modern slavery risks, we regularly consult global indices and analyse wider labour, economic, political, and environmental trends that influence our supply chain.

<sup>15</sup>[Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Business Conduct](#)

Figure 6 – Due diligence process summary based on the OECD's six-step framework

1	<b>Embed responsible business conduct into policies and management systems</b>	<b>Our operations</b>	By aligning with NEC Corporation's global policies, we have integrated international standards into our internal processes, reinforcing ethical conduct and regulatory compliance across our operations.
		<b>Our supply chain</b>	Our sourcing practices are governed by the NEC Group Responsible Procurement framework, which strictly prohibits child labour, forced labour, and unethical conduct. During the reporting period, a cross-functional team ensured supplier compliance, with all our technology partners and service providers meeting legal and international standards and the principles outlined in NEC's guidelines.
2	<b>Identify and assess adverse impacts</b>	<b>Our operations</b>	<p>The various NEC Group-wide ESG compliance reviews led by NEC Corporation within our operations which didn't highlight adverse impacts for NEC Europe.</p> <p>We did operate outsourced services or remote teams in regions classified as high-risk for modern slavery according to Walk Free's Global Slavery Index (GSI)<sup>16</sup> such as the Philippines or India, but with strong controls in place.</p>
		<b>Our supply chain</b>	<p>During the reporting period, we applied a risk-based due diligence approach to screen all new suppliers, with a particular emphasis on ESG risks, including modern slavery. Strategic partners were actively monitored to ensure continued alignment with our ethical standards.</p> <p>We conducted supply chain mapping using criteria such as supplier headquarters location, the nature of goods or services procured, relevant ILO forced labour indicators, and exposure to compliance and human rights risk indices. This analysis did not identify any severe adverse impacts.</p>
3	<b>Cease, prevent or mitigate adverse impacts</b>	<b>Our operations</b>	NEC Europe ensured legal work eligibility through ongoing documentation checks and complied with all employment laws, including wage and working hour regulations. We collaborated with the NEC Group to align HR and procurement practices with international standards, taking corrective action when needed.
		<b>Our supply chain</b>	We collaborated with key suppliers to enhance transparency and recommended corrective actions where necessary. Suppliers inactive for two years were deselected, with reactivation only considered based on business needs, ensuring sourcing integrity.
4	<b>Track implementation and results</b>	<b>Our operations</b>	Due to changes in business activities, the number of high-risk suppliers posing health and safety concerns fell to nearly zero during the reporting period.
		<b>Our supply chain</b>	We ensured cross-functional oversight in 99% of supplier selections. Following changes in business activities, our internal verification team held six dialogue sessions with suppliers and concluded that only one prevention audit was required. While the audit did not identify any specific issues, it reinforced our commitment to early risk detection and continuous improvement.

<sup>16</sup> [Global Slavery Index | Walk Free](#)

5	<b>Communicate how impacts are addressed</b>	<b>Our operations</b>	NEC Europe ensured Senior Leadership oversight by reporting quarterly on human rights and due diligence, while promoting anonymous concern reporting through the Safecall service.
		<b>Our supply chain</b>	Safecall was made available to suppliers and partners to confidentially report human rights or modern slavery concerns, promoting transparency and ethical practices in the supply chain.
6	<b>Provide for or Cooperate in Remediation</b>	<b>Our operations</b>	NEC Europe's whistleblowing program provides structured procedures for investigating and addressing concerns related to human rights or modern slavery, with safeguards in place to protect individuals from retaliation.
		<b>Our supply chain</b>	Suppliers are required to promptly report serious incidents and implement corrective actions. During the reporting period, NEC Europe reviewed minor noncompliance cases, supported remediation efforts, and upheld contractual obligations, including back-to-back compliance with sub-suppliers. All partners must comply with our purchase terms throughout the relationship, and while we reserve the right to disengage in severe cases, no terminations took place due to noncompliance, child labour, forced labour and human rights breach.

Further information on the NEC Group due diligence process in relation to slavery and human trafficking in its supply chain is provided in the NEC Group Modern Slavery and Human Trafficking Statement<sup>17</sup>.

## Risk assessment and management

### Our business

NEC Europe's workforce, primarily professional and administrative roles based in the UK and EEA, is employed under stable, non-seasonal formal contracts. Combined with strong legal and ethical oversight, minimal reliance on outsourced labour, and transparent governance, this structure contributes to a low risk of modern slavery.

Employees benefit from legal protections, access to grievance mechanisms, and representation through the NEC European Forum and Health and Safety Committee. Risk is actively managed through Senior Leadership oversight, HR compliance checks, employee engagement, and ongoing dialogue. Staff consultations, both informal and via structured committees, support continuous improvement.

During the reporting period, no ILO indicators of forced labour were identified, and no modern slavery concerns were raised through Safecall or other grievance channels. Hence, no corrective actions, including remediation or compensation actions, were required.

Risks and opportunities were reviewed through ISO-aligned management systems and integrated into NEC's broader Enterprise Risk Management framework. Findings were reported quarterly to the Board and Senior Leadership, ensuring transparency and accountability.

<sup>17</sup> <https://www.nec.com/en/global/csr/modernslavery/index.html>

## Our supply chain

Although our exposure to direct labor risk is reduced, we recognised that we have an indirect exposure to risk.

To further mitigate supply chain risk, NEC Europe applies a structured due diligence process to its regional technology partners, including pre-engagement screening, contractual compliance clauses, and periodic performance reviews. Shared partners managed by NEC Corporation are subject to group-wide ethical standards and oversight mechanisms, ensuring alignment with our human rights commitments.

We continue to enhance our supplier engagement practices through training, risk mapping, and the integration of internationally recognised frameworks such as the UN Guiding Principles on Business and Human Rights.

To manage supply chain risks, NEC Europe:

- Applies due diligence to all Tier-One suppliers.
- Validates employment agencies prior to engagement.
- Engages only with reputable professional service providers and technology partners after a thorough vetting process.
- Offers Safecall as a confidential reporting channel for suppliers.

While the professional services sector is generally considered low risk for modern slavery, we assess all vendors against human rights criteria. During the reporting period, 99% of suppliers were rated low risk, with one moderate case resolved through further clarification. No disengagements were necessary, and no concerns were raised by NGOs.

We also maintained strict controls to prevent misuse of dual-use technologies that could pose human rights risks. These controls are enforced through full compliance with export control laws and human rights regulations. No such technologies were sold during the reporting period in the EU and EEA, and the risk of misuse within our value chain remained minimal.

We have not identified any evidence of undocumented or exploited migrant labour within our supply chain. We do not engage labour agents or brokers and only work with reputable recruitment agencies, ensuring they meet our standards for ethical employment practices.

Based on supplier engagement, grievance data, and internal reviews, our exposure to modern slavery risks across operations and supply chains was assessed as low.

## Key performance indicators to measure effectiveness of steps being taken

We measure the effectiveness of our modern slavery prevention efforts against tailored progress goals aligned with our business operations and supply chain.

Current results indicate that our processes are functioning effectively.

Key observations include:

- *Supplier responsiveness:* All suppliers responded to our conduct inquiries, with no disengagements required, demonstrating strong alignment with our ethical standards.
- *Grievance monitoring:* No forced labour-related grievances were reported during the period, suggesting low incident rates and good awareness of available reporting mechanisms.

We recognise, however, that our current approach has limitations, particularly our inability to assess risk beyond Tier One suppliers. Addressing this very challenging gap remains important for future improvement.

Figure 7 – KPIs

Progress Goal	Type of initiative	KPI	GRI alignment	FY2024
<b>Leadership and governance</b> <i>Enforce a zero-tolerance approach to modern slavery across all levels of our organisation and throughout our global supply chain.</i>	Leaders' promotion of compliance initiatives	% of company directors participating in compliance-related activities.	GRI 2-14 GRI 2-27	100%
		Number of formal internal communications promoting ethical conduct issued by leadership.	GRI 205-2	10
	Quarterly reporting to Board of Directors	Number of reports submitted on ethics, human rights, and sustainability.	GRI 2-16 GRI 409-1	8
		% of ESG topics covered in quarterly board reports.	GRI 2-13 GRI 2-14	33
<b>Due Diligence</b> <i>Strengthen due diligence by identifying, assessing, and mitigating risks of modern slavery and human trafficking.</i>	Review of internal policies	Frequency of updates to policies referencing human rights, modern slavery, Health & Safety.	GRI 2-23 GRI 2-27	Annual
	Ethical sourcing	% of purchase orders referencing updated Terms and Conditions that cover modern slavery.	GRI 2-23 GRI 409-1	100%
		% of new suppliers assessed for modern slavery risk prior to onboarding.	GRI 414-1 GRI 409-1	100%
<b>Risk management</b> <i>Conduct regular, risk-based compliance reviews to verify adherence to modern slavery and forced labour regulations</i>	Business Practices	% of ESG tender assessments resulting in documented operational improvements related to modern slavery or human rights compliance.	GRI 2-23 GRI 3-3 GRI 409-1	3%
		% of technology products with potential dual-use application procured or sold in the UK or EEA <sup>18</sup> .	GRI 2-27 GRI 416-1	0%
	Sustainable procurement	% of suppliers flagged as high-risk based on screening criteria.	GRI 414-1 GRI 409-1	0%
		% of strategic suppliers reviewed for compliance with NEC's Guidelines for Responsible Business Conduct in the Supply Chain.	GRI 414-2	98%
<b>Effectiveness</b> <i>Implement structured, risk-based monitoring to ensure timely detection and response to modern slavery risks</i>	Incident reporting and remediation	Number of modern slavery-related concerns reported via Safecall for own operations and resolution time	GRI 2-16 GRI 409-1	0
	Supply chain management	Number of modern slavery-related concerns reported via Safecall for the supply chain and resolution time.	GRI 2-16 GRI 409-1	0
		% of supplier onboarding files with complete documentation compliant with NEC protocols.	GRI 2-27 GRI 414-1	97%

<sup>18</sup> European Economic Area

Progress Goal	Type of initiative	KPI	GRI alignment	FY2024
<b>Training and awareness</b> Increase awareness of ESG topics, including modern slavery and human rights—among our employees and high-risk suppliers through tailored communications and targeted learning resources	Staff education	% of completion rate on sustainable procurement training, including ethical sourcing and modern slavery awareness.	GRI 2-24 GRI 2-30	99%
		% of employees in procurement roles completing annual refresher training on sustainable procurement.	GRI 2-24 GRI 2-30 GRI 414-1	100%
		% of new employees receiving induction training reflecting NEC's values and ethical culture within 30 days of hire.	GRI 2-24 GRI 2-30 GRI 2-23	90%
	Supplier capacity building	Number of active suppliers that have provided formal acknowledgement of NEC's Responsible Business Conduct Guidelines during the reporting period.	GRI 2-24 GRI 3-3 GRI 414-1	30
<b>Stakeholder engagement</b> Publish Statements on recognised websites that promote ethical business conduct and transparency including modern slavery	Human Rights engagement	Number of human rights related events attended during the reporting period.	GRI 2-23 GRI 2-24	10
	United Nations (UN) Global Compact participation	Submission of the annual Communication on Progress (CoP)	GRI 2-22	Annual
		Active membership in the UN Global Compact Network UK and contribution to initiatives that advance responsible business conduct and support modern slavery prevention.	GRI 2-22 GRI 3-3	Quarterly
	Statement accessibility	Modern Slavery Statement published on both company website and UK Government Registry.	GRI 2-24 GRI 2-25	Annual
	Supplier interactions	Number of documented supplier engagements focused on ESG topics	GRI 2-29 GRI 308 GRI 414	5
<b>Beyond legal compliance</b> Build a culture that helps prevent modern slavery and exploitation.	Support to the UN Sustainable Goals, especially SDG 8 and SDG 10	Number of internal events promoting inclusion and diversity during the reporting period.	GRI 405-1	1

## Training on modern slavery and trafficking

### Our business

NEC Europe promotes responsible business conduct and modern slavery prevention through comprehensive training for all staff levels and suppliers. Training content is reviewed annually and updated to reflect evolving risks, regulatory changes, and stakeholder feedback.

In FY2024, 100% of employees and relevant partners received formal communication on the NEC Code of

Conduct, Human Rights Policy, and compliance standards via town halls, eLearning, onboarding, and the internal portal.

Senior Leadership reinforced ethical culture through initiatives such as sustainable procurement training, compliance awareness events, induction programs, and intranet resources. Engagement was tracked with a 99% training completion rate.

## Our supply chain

We engaged our direct suppliers on our responsible business conduct expectations by sharing information on relevant sustainability processes. During the reporting period, about 30 suppliers confirmed their compliance with these standards.

## Stakeholder engagement

While NEC Europe does not operate with trade unions, we actively engage with labour councils to ensure employee representation and open dialogue.

We regularly seek input from customers, suppliers, employees, and subject-matter experts to remain aligned with evolving societal expectations around human rights and modern slavery. We also support customer requests related to our compliance with modern slavery requirements.

During the reporting period, as part of our ongoing commitment to continuous improvement and the Sustainable Development Goals, we participated in initiatives such as the UN Global Compact Network UK peer reviews of modern slavery statements, fostering shared learning among member companies. We also took part in a range of human rights and corporate responsibility events and webinars hosted by the UN Global Compact, Tech UK, and the Japanese Business Council in Europe, reinforcing our commitment to ethical business practices and stakeholder collaboration.

Insights gathered through peer reviews, event participation, and stakeholder consultations have informed enhancements to our training content, supplier engagement practices, and internal governance processes.

## Looking ahead, our plan

Throughout the financial year ending 31 March 2026, NEC Europe will continue to:

- Publish modern slavery and human trafficking statements on recognised platforms that promote global accountability.
- Strengthen human rights due diligence through ongoing vigilance and process enhancement.
- Integrate insights on forced labour, broader human rights, and environmental due diligence to drive coordinated, responsible business actions.
- Enhance transparency by aligning our reporting with internationally recognised standards.
- Use the 2025 Transparency in Supply Chains (TISC) Guidance as a reference to assess our practices and drive continuous improvement.

Through these efforts, NEC Europe seeks to play a constructive role in promoting ethical supply chains and supporting broader progress in the fight against modern slavery.