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BUSINESS ETHICS POLICY

NES is committed to maintaining the highest standard of ethics and integrity in the conduct of its business. We embrace our core values throughout global operations and shall act in the best interests of the business at all times.

Our Business Ethics policy outlines the expectations and responsibilities of NES employees, and business partners, to help achieve our obligations in preserving the trust and confidence of our Stakeholders and to ensure our business complies with defined requirements across our global operations.

The basic principles of this Policy are to:

- highlight the importance of maintaining NES's reputation for dealing with its employees, customers, suppliers and competitors fairly and legally;
- communicate the values and standards that should govern the behaviour of NES employees and business partners;
- create an environment where all employees are confident that their actions on behalf of NES are ethical; and
- encourage and promote corporate social and responsibility throughout the organisation.

While the standards in this Policy are mainly based on compliance to applicable laws, they also reflect the values which define NES and its employees.

SCOPE OF THE POLICY//

This Policy applies to all NES employees, its business partners and as applicable any contractors and workers engaged by NES who provide services to clients. All such persons are expected to comply with this Policy and to use their best endeavours to ensure that all of its operations comply with the legal requirements of any geographic region in which it operates, in accordance with local cultural customs, NES core values, and in agreement with the NES Schedule of Management Authority (SOMA).

The NES Board has overall responsibility for the Policy and for the development of supporting practices and procedures.

The Policy will be reviewed annually. Directors of subsidiary companies are responsible for communicating the Policy to employees and those contents and expectations are understood and followed throughout their respective companies.

All employees are encouraged to report any actions or events that are or may appear to be in breach of any aspect of this Policy, in accordance with the Whistleblowing Policy, without fear of reprisal.

BRIBERY & CORRUPTION//

NES work in compliance to the Bribery Act 2010 and conduct business with integrity, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

Whilst some of the sectors and geographical locations that NES works in are known to be high risk areas for corruption and bribery, NES continue to have a zero tolerance approach to corrupt practices in any form, or any illegal or non-compliant behaviour, wherever it may occur.

Our Anti-Bribery and Corruption Policy sets out how NES will maintain high standards and how our practices and expectations extend to those to whom NES wish to do business with.

HOSPITALITY & GIFTS//

It is rare for NES to be involved in the giving or receiving of hospitality or gifts, and they definitely will not be offered if it is against the corporate policy of a client or local law or custom.

The Hospitality and Gifts Policy provides guidance to NES employees when considering whether to offer or accept any form of gifts or hospitality and encourages employees to adopt a questioning attitude to consider the context in which the hospitality or gift is being given or received, and the approvals that are required.

Any hospitality or gift that NES gives will be reasonable, proportionate, in good faith and connected with legitimate business.

If it appears the intention behind any hospitality or gift offered to NES is to influence improper behaviour, that employee should politely refuse. If a client or business partner feels any hospitality or gift offered by NES is inappropriate, then they should decline without feeling they need to explain why.

HUMAN RIGHTS//

NES promote respect for, and protection of human rights throughout the business and will not take part in any activity that involves human rights abuses nor be complicit in activities that solicit or encourage such abuses.

NES work to ensure the protection of employee rights and in turn expect our employees to respect the rights of others.

Our Human Rights Policy defines standards and expectations of NES, its employees and business partners, and responsibilities in relation to the rights and treatment of others.

FORCED LABOUR & HUMAN TRAFFICKING//

Personal integrity and responsibility are the foundation of our business; we differentiate our solutions on the basis of compliance, integrity and responsibility, and in accordance with local and international laws. Within this context, NES will not accept any practices involving slavery, servitude, forced or compulsory labour, or human trafficking. We will continue to work to fully understand the risks involved and to ensure such practices are not taking place within our business, that of our partners or the ensuing supply chain.

NES' approach to tackling modern slavery is defined within our [Modern Slavery statement](#).

EQUALITY & DIVERSITY//

NES embraces diversity and will seek to promote the benefits of diversity to all employees and clients in all of its business activities. NES will seek to develop a business culture that reflects that belief and widen the media in which it recruits to ensure as diverse an employee and candidate base as possible.

NES will review on an on-going basis all aspects of its recruitment to avoid unlawful or undesirable discrimination and ensure adherence to the Equal Opportunities and Diversity Policy at all times and will strive to make sure that our clients meet their own diversity targets.

NES will treat everyone equally irrespective of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or membership or non-membership of a Trade Union or spent convictions, and places an obligation upon all employees to respect and act in accordance with the Equal Opportunities and Diversity Policy.

NES is committed to providing training for its employees in equal opportunities practice.

ACCOUNTING STANDARDS//

All accounts and records must be documented in a manner that clearly identifies and describes the true nature of business transactions, assets or liabilities, and properly and promptly classifies and records entries in conformity with generally accepted accounting principles.

No record, entry or document shall be deliberately false, distorted, misleading, misdirected, incomplete or suppressed. The retention or proper disposal of NES records shall be in accordance with established corporate policies and applicable legal and taxation requirements.

TAXATION//

NES always aims to be tax compliant and our tax policy reflects and supports our business by ensuring a sustainable tax rate, mitigating tax risks in a timely and cost efficient way and complying with rules and regulations in the jurisdictions, including the UK, in which NES operates.

Each NES subsidiary works closely with reputable, local tax advisors to ensure it understands local tax risks and obligations in respect of all applicable direct and indirect taxes, and to ensure payments and filings are made on time and in full.

NES' policy and approach to taxation and tax risk is defined with our [Taxation Strategy](#).

CONFLICT OF INTEREST//

Employees should avoid conduct which would be detrimental to the best interest of NES or its clients and shall ensure they do not enter into any situation in which their personal or financial interests may potentially or actually conflict with those of NES or its clients by giving rise to personal benefit or cause embarrassment and / or damage to the reputation, name or goodwill of NES or its clients.

Where any potential conflict of interest may arise, the employee must promptly declare that interest in writing and seek advice from their Director.

RESPONSIBLE PROCUREMENT//

NES follows the Ethical Trading Initiative (ETI) Base Code and compliance with applicable laws.

As a minimum NES promotes responsible procurement which includes:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practiced;
- Regular employment is provided;
- No harsh or inhumane treatment is allowed.

COMPETITORS//

NES supports laws prohibiting restraints of free trade and unfair practices. Employees will not:

- Wrongfully induce a competitor's client to break a contract with that competitor;
- Commit industrial espionage to acquire a competitor's trade secrets; or
- Make false or disparaging comments about a competitor's products or services.

QUALITY ASSURANCE//

Quality is key driver within NES and is incorporated to business operations and strategy. Our management system allows NES to demonstrate its ability to provide a consistent service that meets customer and legislative requirements. Our practices ensure continuity and best practice is delivered to achieve customer satisfaction by mitigating risk exposure and continually looking at opportunities for business growth.

In order to achieve intended results, it is important that NES, employees and business partners are fully committed to providing quality services and support to our customers. Our Quality Assurance Policy details our commitment for a quality assured service.

The following statements proclaim our expectations of employees in respect to quality assurance:

- NES believe that customer service quality must be established and assured right from the initial approach;
- NES's reputation is very dependent on agreeing and defining clear and measurable service levels;
- ISO 9001 compliance is assured; certification is monitored through a nationally accredited body and compliance through internal reviews; and
- Adherence to NES policies and the practices of continual improvement by monitoring performance, service levels and customer feedback is a duty required of all employees.

DATA PROTECTION & CONFIDENTIALITY//

As an organisation, NES has a need to process accurate personal information about individuals in order to provide an effective and efficient service.

As such, Information Security plays a key part of our daily security measures to ensure data is handled in a confidential manner, to ensure business continuity, compliance to data protection laws and to minimise or prevent impacts of any incidents, whether these are accidental or deliberate, internal or external.

HEALTH, SAFETY & WELFARE//

NES the health and safety of all its employees as a high priority and will take the required steps to ensure that health & safety responsibilities continue to be met at all times.

Our aim is to provide the safest working conditions possible and to ensure, so far as is reasonably practicable, that the health, safety and welfare of its employees is sustained, as is the health and safety of any other persons who may be affected by its activities.

Employees are provided with the necessary equipment, information, training and supervision to implement our Health and Safety Policy, and have a duty to ensure the highest standards are maintained at all times and to conduct their roles safely and in accordance with policy content and their responsibility levels

CORPORATE SOCIAL RESPONSIBILITY//

Understanding where we fit in the business world and how we engage with the business world is key which is why NES not only commit to providing employment opportunities in the areas in which we do business, but also to contribute to local communities and support causes or charities that matter to them.

Along with individual contributions by NES employees, NES have a global initiative encouraging employees to dedicate some of their time to a cause of their choice applicable to their locality. Every employee is entitled to take one paid working day a year and apply it to a charity activity as they see fit. NES will work with the employee to highlight their cause to the rest of the group via our company intranet portal. Local and global offices will often also provide further support via group fundraising and team events. This approach is line with our overall philosophy of providing local support backed by global resources.

ENVIRONMENT//

NES are increasingly determined to achieve and demonstrate sound environmental performance by assessing and controlling the impact our operations have on the environment.

As an office based service provider, NES is aware that good housekeeping is an effective way to manage such environmental and energy conservation, and therefore our strategy is to adopt environmentally sustainable practices to reduce carbon footprint and improve environmental performance, by way of:

- Complying with applicable legal requirements which relate to environmental aspects;
- Reducing waste through re-use, recycling or conservation practices;
- Communicating with employees on environmental matters; and
- Integrating environmental considerations into day-to-day activities.

Employees are asked to familiarise themselves with our Environmental Policy and, wherever possible to reduce waste, use recycling facilities and unnecessary travel and to consider the environment when making purchasing or operational decisions.

QUERIES, REPORTING SUSPICIONS AND INVESTIGATING//

NES has procedures in place to enable employees to report instances or concerns relating to modern slavery in a confidential manner.

NES will ensure that any concerns are investigated appropriately and any identified instances relating to modern slavery or human trafficking are dealt with timely and relevant remedies made available to potential victims.

Concerns relating to activities that may involve the indicators of modern slavery should be immediately reported to NES' Expected Business Conduct officer(s) via ethics@nesgt.com. This includes where individuals have reasonable suspicion or have evidence of actual instances of modern slavery either through NES' business operations or the operations of our suppliers or clients.

For confidential notifications, NES' Whistleblowing Procedure sets out the process an employee should follow if they have a serious concern about certain business conduct within NES by a director, manager or employee. In the first instance, the employee should raise the matter with their line manager but if unable to do so, then the matter should be escalated to the NES' Expected Business Conduct officer(s) via ethics@nesgt.com.

For emergency situations, individuals should report findings to their local emergency helpline number.

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