NOUS GROUP - MODERN SLAVERY STATEMENT & POLICY - FY 2024

Australia, the United Kingdom, and Canada have implemented modern slavery legislation to prevent and address the risk of modern slavery in supply chains and the operations of organisations.

Nous Group believes in doing business ethically and adopts a zero-tolerance approach to modern slavery.

This Modern Slavery Statement and Policy sets out the steps we are taking to identify, mitigate, and remediate the risks of modern slavery in our supply chain and business operations.

If you have any concerns about modern slavery taking place in our business, please contact governance@nousgroup.com

Reporting Entity, Structure, Operations and Supply Chain

Reporting Entity

This statement is for the financial year ending 30 June 2024, and has been approved by the Nous Executive Board (**NEB**) on 23 September 2024 for:

1. Nous Group International Pty Ltd (**NGI**);
2. Nous Group Pty Ltd (**Nous Australia**);
3. Nous Group (UK) Ltd (**Nous UK**);
4. Nous Group Holdings (Canada) Ltd (**Nous Canada**);
5. Cubane Consulting Group Pty Ltd (**CCG**);
6. Cubane Solutions Pty Ltd (**CS**);
7. Cubane Consulting Pty Ltd (**CC**);
8. Cubane Consulting (UK) Ltd (**CCUK**);
9. Cubane Consulting (Canada) Ltd (**CCC**); and
10. Health Policy Analysis Pty Ltd **(HPA**),

(together, **Nous Group**).

Our operations

Nous Group is an international business providing management consultancy and university benchmarking services, with approximately 750 people working across Australia, the United Kingdom, and Canada. Our work reflects our optimism and ambition for a better future. We partner with leaders to shape world class businesses, effective governments, and empowered communities. We believe in doing business ethically, and this underpins our commitment to examine our supply chains and promote our zero-tolerance approach toward modern slavery.

The organisations comprising Nous Group are each wholly owned or controlled by Nous Group International Pty Ltd.

The purpose of this Modern Slavery Statement and Policy is to:

- demonstrate Nous Group's commitment to only doing business with suppliers who effectively manage their modern slavery risks, where those risks might exist; and
- ensure Nous Group complies with applicable modern slavery legislation.

In this document, 'modern slavery' is defined as labour conditions where a worker cannot refuse or cease work because of coercion, threats or deception.

Supply Chain

Where possible, Nous Group engages partners and suppliers that aim to support the community by employing vulnerable populations. We promote relevant businesses internally and procure from such suppliers for both internal needs, and for client work.

Nous Group works with a range of suppliers across its offices for various services, including information technology, finance, marketing, and people functions. We also engage travel booking and transport services, as well as catering and cleaning services for facilities management.

While we deal with most of these suppliers directly, in many cases these suppliers will also work with entities that we do not have a direct contractual relationship with.

Nous Group maintains a centralised email address for people to report concerns regarding modern slavery and unethical practices within the Nous Group. These concerns will be received by Nous Group's Head of Information Security and Risk who will liaise with Nous Group's Head of Legal to determine the best course of action.

Risks of Modern Slavery

In terms of our people, the risk of there being any issues of modern slavery are low as our employment contracts comply with the relevant laws in each jurisdiction that we operate.

Regarding our direct supply chain (Tier 1 suppliers), there is minimal risk of modern slavery as our business does not intersect directly with any high-risk industries. We are, however, engaged with higher-risk industries indirectly (Tier 2 suppliers). For example, we procure laptops and electronic devices through third parties, and our building managers engage cleaners to perform cleaning services in our offices.

In FY24, to effectively manage our modern slavery risks, we assessed which types of suppliers would have a higher risk of modern slavery in their supply chain, based on the types of goods and services that Nous Group procures.

Actions taken to address the risks of Modern Slavery & assessment of effectiveness

Nous Group has a zero-tolerance approach to modern slavery. While we always seek to engage with ethical suppliers and vendors, we recognise the need to regularly review our policies and procedures as Nous Group's business grows in both jurisdictional reach, and operational sophistication.

In FY24, Nous Group's Sustainability Manager and the Head of Information Security and Risk consulted with Nous Group's Functional Leads and other senior team members who are responsible for procuring goods and services from various suppliers on behalf of Nous Group.

This consultation identified that the following categories of suppliers may have higher modern slavery risks in their supply chain. For example:

- Building management services, such as cleaners
- IT equipment providers
- SaaS IT vendors whom our annual spend is > $100,000
- Our primary provider of office supplies

To address these risks, Nous Group obtained the latest annual modern slavery statement from these suppliers to assess how they managed their modern slavery risks, and concluded that there were no modern slavery issues identified.

Consultation for this Joint Statement

This statement is issued on behalf of NGI, Nous Australia, Nous UK, Nous Canada, CCG, CS, CC, CCUK, CCC and HPA. This Statement was approved by the NEB, which is made up of Nous Group's Managing Principal and CEO, and a selection of Function Leads and Principals from across Nous Group. The NEB is predominantly made up of people working at Nous Australia as Nous Australia performs most of the administrative and support functions for, and on behalf of, the balance of the Nous Group entities including, providing finance, legal, marketing, and HR assistance. However, the NEB includes representatives from Nous UK and Nous Canada. CCG, CS, CC, CCUK, CCC and HPA are represented on the NEB by Nous Group's Managing Principal and CEO.

Other relevant information

While NGI is a holding company and engages only few suppliers, NGI has been added to this statement to ensure all entities within Nous Group consider relevant modern slavery issues.

Conclusion

Any concerns about modern slavery taking place in our business should be raised by emailing governance@nousgroup.com.

Signed



Tim Orton

Managing Principal and CEO