



Modern Slavery and Human Trafficking Statement 2026

NEC EUROPE LTD

About this statement

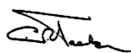
This Modern Slavery and Human Trafficking Statement (the "**Statement**")¹ is published by NEC Europe Ltd and refers to the requirements of Section 54 of the Modern Slavery Act 2015 ("**The Act**").

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

The Statement outlines the steps that we have taken during the Financial Year that ended 31st March 2026 ("**Reporting Period**") to prevent any form of modern slavery and human trafficking from occurring within our organisation and supply chain.

No instances of modern slavery or human trafficking were identified through our due diligence and monitoring activities during the Reporting Period. While our overall risk exposure remains low, we continue to strengthen our governance, due diligence and supplier engagement activities to support the effective management of modern slavery and human rights risks.

This Statement has been reviewed and approved by the Board of Directors of NEC Europe Ltd on 30 September 2026 and signed by the President and CEO on its behalf.



Signed on the same day

Chris Jackson
President & CEO
NEC Europe Ltd

¹ We published our first Modern Slavery Statement in 2016, and this is our 11th statement.

² <https://uk.nec.com/>

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Ethical leadership, governance and accountability

NEC Europe Ltd is the UK regional headquarters of NEC Group³ and a wholly owned subsidiary of NEC Corporation⁴, a global provider of technology services and solutions.

Responsibility for managing our human rights and modern slavery framework is shared across Sustainability, Procurement, Finance, Legal, and Human Resources, with Sustainability leading the implementation of controls and reporting on performance and progress.

Governance arrangements are supported through regular compliance reviews and management systems reviews.

The Board of NEC Europe maintains oversight of the human rights and modern slavery framework, including the effectiveness of associated controls, through our Quarterly Board reporting process.

These activities support NEC's zero-tolerance approach to modern slavery and human rights abuses.

Commitment to action

Modern slavery and human trafficking remain global risks. Building on the actions taken in previous years, we remain committed to a zero-tolerance approach to all forms of exploitation and to meeting our obligations under the UK Modern Slavery Act 2015.

We recognise that preventing modern slavery requires ongoing vigilance and collective effort. We assess modern slavery risks as part of our broader risk management and supplier due diligence activities, using a risk-based approach to identify, evaluate and address potential modern slavery risks across our operations and supply chain.

Beyond regulatory compliance, we continue to strengthen our efforts through transparency, stakeholder engagement and continual improvement. By working closely with our workers, suppliers and other stakeholders, we contribute to the wider goal of eliminating modern slavery and human trafficking.

Our approach to assessing effectiveness

We monitor progress against the commitments and initiatives outlined in our previous Modern Slavery Statements, through Key Performance Indicators (KPIs) informed by relevant GRI Standards⁵, supporting transparency, accountability and continual improvement. We also regularly review our processes against international developments, regulatory changes and emerging best practices.

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

⁴ <https://www.nec.com/>

⁵ <https://www.globalreporting.org/standards>, including GRI 2 (General Disclosures) and GRI 409 (Forced or Compulsory Labor)

Organisation structure and supply chain

Our organisation

The Statement reflects NEC Europe's ongoing efforts to align with the expectations of the 2025 Transparency in Supply Chains (TISC) Guidance⁶. It applies to the NEC Europe companies listed in *Figure 1*. Other NEC Group entities may issue separate statements or be covered by the broader Group Statement, as appropriate.

NEC Europe's operations are primarily based in the United Kingdom and the European Union. Our core business activities encompass a broad range of business-to-business (B2B) functions, including business development, sales and marketing, customer support, and research and development.

Figures 1 and 2 provide context for our statement.

Figure 1

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

Figure 2

Company	Principal country of operation ⁷	% of employees (NEC Europe total)	Contribution to NEC Europe Group Turnover (Adjusted, €m)	Holding by NEC Europe Ltd.
NEC Europe Ltd (Head office, including NEC (UK) Ltd. operations)	United Kingdom	38%	5%	-
NEC Deutschland GmbH	Germany	32%	68%	100%
NEC Iberica S.L.	Spain	21%	9%	100%
NEC Scandinavia AB.	Sweden	4%	14%	100%
NEC Portugal Telecomunicações e Sistemas, S.A.	Portugal	3%	1%	100%
NEC Nederland B.V.	Netherlands	0%	2%	100%
NEC France S.A.S.	France	0%	1%	100%

During the Reporting Period, NEC Europe Group employed approximately 240 people and generated revenue of approximately €138 million during the Reporting Period across its operations.

Approximately 99% of our workforce is employed on a permanent basis, and we have very limited reliance on temporary labour and contractors.

Our workforce is primarily located in the UK, Germany and Spain, which together account for over 90% of our employees. The predominantly permanent nature of our workforce, together with established labour

⁶ [Transparency in supply chains: a practical guide \(accessible\)](#) - GOV.UK

⁷ Fixed Asset Investment in active operation

protections, employment practices and management oversight in the countries where we operate, contributes to a lower risk of modern slavery within our own operations. We do not engage labour agents or labour brokers and work only with recruitment agencies that are expected to meet our standards for ethical employment practices and legal compliance.

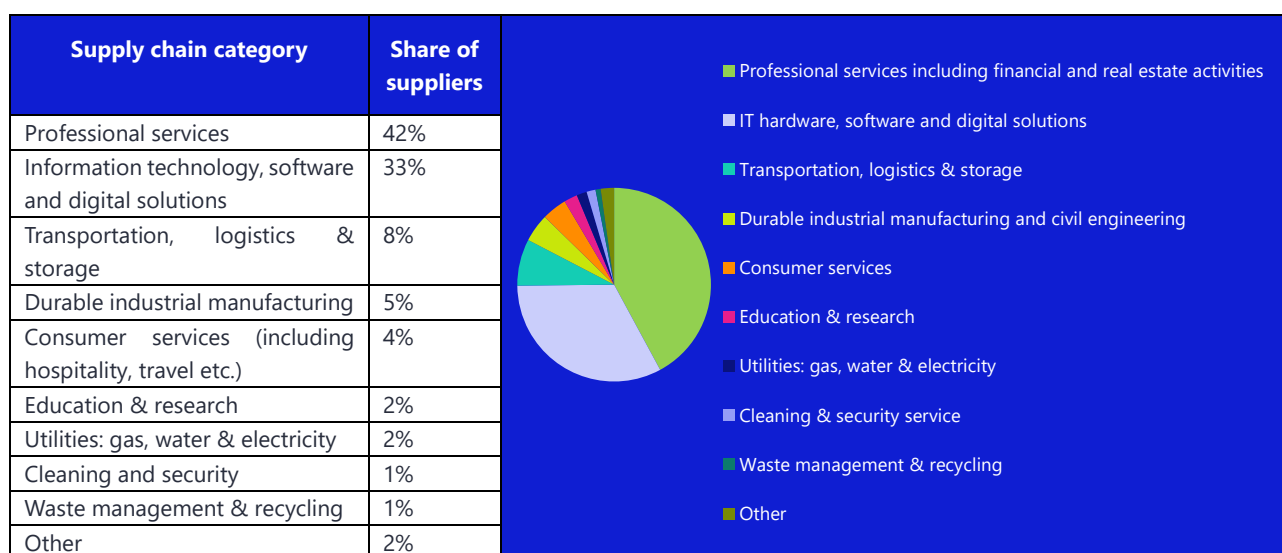
We serve a diverse client base across the private and public sectors, including commercial organisations, government agencies, and local authorities in the United Kingdom and European Economic Area (EEA).

Given the scale of our operations, we review publicly available human rights and modern slavery disclosures or Codes of Conduct of our strategic customers to inform our understanding of industry practices, governance frameworks and approaches to managing these issues. Most significant customers publish human rights, sustainability or modern slavery disclosures demonstrating established governance arrangements

Where publicly available disclosures were less informative, this was generally associated with the nature of the organisation rather than identified human rights concerns.

Our Supply Chain

Figure 3 shows the distribution of active suppliers and partners by activity sectors during the Reporting Period, based on the number of suppliers.



While we occasionally distribute products supplied by NEC Group companies and technology partners, we do not undertake manufacturing or product assembly activities ourselves.

Our suppliers and technology partners include both small and medium-sized enterprises (SMEs) and larger multinational organisations and are primarily located in the United Kingdom, Germany, Spain, the Netherlands and Portugal. A smaller number of our partners are in Sweden and the United States.

We apply a risk-based approach to supplier management, including periodic performance reviews, risk assessments, due diligence activities and compliance monitoring. The level of due diligence, monitoring and review is proportionate to the nature of the supplier relationship and the associated risks.

We assess human rights, labour, environmental and business ethics risks across our supplier base as part of our due diligence and supplier management processes.

However, visibility beyond our direct supplier base varies depending on the nature of the products and services provided and the information available from suppliers, and we recognise that modern slavery risks may still

exist within our wider supply chain.

Going forward we will continue to strengthen our supply chain governance through enhanced due diligence, supplier engagement, and alignment with internationally recognised human rights standards.

Policies in relation to slavery and human trafficking

NEC Europe's efforts to identify, assess and address modern slavery and human trafficking risks form part of NEC Corporation's broader Human Rights agenda. This framework guides responsible business conduct across the NEC Group and supports a consistent approach to respecting human rights, promoting ethical business practices and managing modern slavery risks.

Our commitment is supported by a suite of global policies and standards that apply across the NEC Group, and related procurement and compliance procedures. Together, these policies establish expectations for employees, suppliers and business partners regarding ethical conduct, respect for human rights, fair labour practices and the prevention of modern slavery and human trafficking. These requirements are embedded within our governance processes and inform our approach to supplier due diligence, risk assessment, supplier engagement and compliance monitoring activities.

NEC Group Policies

The NEC Group has placed the respect for human rights as one of the Principles of the NEC Way⁸ and in the NEC Group Code of Conduct⁹, which clearly states that 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 Organization (ILO) Core Labour Standards, the UN Guiding Principles on Business and Human Rights (UNGPR), the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, the Ten Principles of the UN Global Compact¹⁰ and other internationally recognised national laws and regulations in the relevant region.

The NEC Group Human Rights Policy¹¹, 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"¹² and "Guidelines for Responsible Business Conduct in Supply Chains"¹³.

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 ESG¹⁴ Databook can be found here: <https://www.nec.com/en/global/sustainability/report/index.html>

⁸ <https://www.nec.com/en/global/sustainability/management/nec.html>

⁹ https://www.nec.com/en/global/about/pdf/necway/nec_code_of_conduct.pdf

¹⁰ 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).

¹¹ https://www.nec.com/en/global/csr/pdf/human_rights_en.pdf

¹² <https://www.nec.com/en/global/purchasing/renshiki-a2.html>

¹³ https://www.nec.com/en/global/purchasing/data/en2_sc_guideline_4e.pdf

¹⁴ ESG: Environmental, Social and Governance

NEC Europe Policies

NEC Europe applies NEC Group policies and standards through its governance, procurement and supplier management arrangements. This framework supports a consistent approach to identifying, assessing and managing human rights risks and modern slavery across our operations and supply chain.

Aligned with the NEC Group commitment to responsible business conduct, NEC Europe has established policies, procedures and internal controls that embed human rights principles into day-to-day business activities. These arrangements apply to all personnel, including permanent, temporary, and agency workers, and inform our expectations of suppliers, business partners and other relevant third parties. New and revised policies are communicated through established internal channels, including our intranet, compliance updates, management communications and targeted training programmes. This helps ensure that employees remain aware of their responsibilities and are equipped to uphold our ethical, human rights and anti-slavery commitments.

Figure 4 – NEC Europe Policies

Responsible business policies	Policies are reviewed annually by Senior Leadership and provide the framework for managing human rights and modern slavery risks across NEC Europe's operations, procurement activities and supply chain.
Ethical sourcing	Guided by the NEC Group Responsible Procurement framework ¹⁵ , we promote responsible sourcing practices that support human rights, fair labour standards and ethical conduct throughout our supplier chain. We expect our suppliers and business partners to uphold equivalent standards throughout their operations and supply chains.
Employment rights & worker protections (relevant key employment provisions)	Our Human Resources policies support the protection of human and labour rights through fair employment practices, non-discrimination, the prevention of child and forced labour, and access to effective grievance mechanisms. These policies include freedom of employment; freedom of movement; freedom of association; non-discrimination and equal opportunity; prevention of child labour; prevention of forced labour; no worker-paid recruitment fees; protection of personal documentation; respectful workplace; access to grievance and remediation mechanisms.
Work-life balance and wellbeing	We promote employee wellbeing, healthy work-life balance, flexible working arrangements and responsible working practices to support the welfare of our employees and reduce the risk of exploitation.
Equal opportunity commitment	We are committed to fostering a diverse, equitable and inclusive workplace that promotes fair treatment, respect for human rights and protection from discrimination, harassment and abuse.
Whistleblowing and reporting mechanisms	We maintain confidential reporting channels that enable concerns relating to modern slavery, human rights and other misconduct to be raised, investigated and addressed without fear of retaliation. The programme is overseen by senior management and incorporates clear processes for investigation, corrective action and remediation.
Procurement control	We reviewed our vendor management controls and introduced a new supplier corrective action and remedy process.

Due diligence processes

Our due diligence approach is aligned with the OECD's six-step due diligence framework¹⁶. We strengthen this approach using recognised country and sector risk indicators, stakeholder engagement and ongoing

¹⁵ <https://www.nec.com/en/global/purchasing/sustainable.html>

¹⁶ [Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Business Conduct](#)

monitoring to identify, assess and manage potential human rights and modern slavery risks within our operations and supply chains.

Figure 5 – Due diligence process summary based on the OECD's six-step framework

1	Embed responsible business conduct into policies and management systems	Our operations	We embed international standards into our operations through NEC Corporation's global policies, promoting ethical conduct and regulatory compliance.
		Our supply chain	Our supplier due diligence and governance activities support compliance with responsible procurement requirements and identified no instances of modern slavery or human trafficking during the Reporting Period.
2	Identify and assess adverse impacts	Our operations	No adverse human rights or modern slavery impacts were identified through NEC Group ESG compliance reviews. Although our operations did not include outsourced services or remote teams in higher-risk regions ¹⁷ , we recognise that risks may arise within global supply chains and maintain appropriate due diligence controls to manage them.
		Our supply chain	We used risk-based supplier due diligence, supply chain mapping and ongoing supplier monitoring to assess potential modern slavery risks. Based on these activities, no suppliers were identified as requiring enhanced investigation for severe modern slavery impacts during the Reporting Period.
3	Cease, prevent or mitigate adverse impacts	Our operations	We support compliance with employment, human rights and labour standards through right-to-work verification, responsible employment practices, and ongoing improvements to human resources and procurement controls.
		Our supply chain	We promote supply chain transparency through supplier engagement and apply renewed due diligence to suppliers before re-engagement following extended periods of inactivity.
4	Track implementation and results	Our operations	The number of suppliers assessed as presenting elevated health and safety risks was at a minimal level during the Reporting Period.
		Our supply chain	Cross-functional supplier oversight, periodic reviews and preventive audits support proactive risk management and continuous improvement. No modern slavery concerns were identified during the Reporting Period.
5	Communicate how impacts are addressed	Our operations	Senior Leadership oversight and independent whistleblowing mechanisms support the monitoring, reporting and management of human rights and modern slavery risks.
		Our supply chain	Our independent whistleblowing mechanism, NEC Compliance & Integrity Hotline ¹⁸ , supports the confidential reporting of human rights, modern slavery and ethical concerns, promoting transparency and accountability across our supply chain.
6	Provide for or Cooperate in Remediation	Our operations	Whistleblowing procedures support the confidential reporting, investigation and resolution of human rights and modern slavery concerns, with safeguards against retaliation.
		Our supply chain	Supplier monitoring, incident reporting and remediation processes support ongoing compliance and continuous improvement. No supplier relationships were terminated due to modern slavery or other human rights violations during the Reporting Period.

Further information on the NEC Group due diligence process in relation to slavery and human trafficking in its

¹⁷ Walk Free's Global Slavery Index (GSI)

¹⁸ [NEC Compliance & Integrity Hotline: EMEA Policies | NEC](#)

supply chain is provided in the NEC Group Modern Slavery and Human Trafficking Statement¹⁹.

Risk assessment and management

We have identified the following supplier groups as presenting the greatest potential human rights and modern slavery risk within our supply chain, based on the nature of the products or services provided, geographic location and supply chain characteristics:

Figure 6 – Identification of priority risk areas

Risk area	Why this may present a risk	Controls in place	Further action planned
Suppliers providing hardware or physical products (representing approximately 24% of our total supplier count)	Product supply chains can involve multiple suppliers and manufacturing stages, reducing visibility beyond direct suppliers.	Risk-based supplier due diligence; supplier risk assessments and, monitoring review of supplier location, sector, human rights risks.	Continue to improve supply chain mapping and supplier engagement to increase transparency in product supply chains.
Suppliers operating in countries assessed as presenting elevated human rights and forced labour risks based on recognised international risk indicators (representing approximately 1% of our total supplier count).	Some countries may present increased risks due to weaker labour protections and enforcement.	Country risk screening; risk-based supplier due diligence; ongoing supplier monitoring and periodic risk reviews.	Continue to monitor country risks and apply enhanced due diligence where appropriate.
Suppliers providing cleaning, security, waste management, recycling services and logistics (representing approximately 10% of our total supplier count).	These sectors often rely on labour-intensive work and subcontracting arrangements, which can increase the risk of poor labour practices.	Supplier onboarding controls; contractual requirements; supplier reviews; supplier engagement and compliance monitoring; whistleblowing mechanisms.	Continue targeted engagement and monitoring of labour practices and subcontracting arrangements where appropriate.
Suppliers using agency, temporary or migrant labour.	Increased risk of labour exploitation and reduced visibility beyond Tier 1 suppliers.	Risk-based due diligence, agency validation, supplier requirements and reporting mechanisms.	Continue supplier engagement and promote responsible business conduct throughout the supply chain.

Our business

NEC Europe's workforce is primarily comprised of professional and administrative employees based in the United Kingdom and the European Economic Area (EEA), who are engaged under stable, non-seasonal employment contracts. Combined with strong legal and ethical oversight, limited reliance on outsourced labour, and established governance arrangements, this operating model contributes to a comparatively low risk of modern slavery within our direct operations.

¹⁹ <https://www.nec.com/en/global/csr/modernslavery/index.html>

Employees benefit from legal employment protections, confidential reporting channels, and representation through the NEC European Forum and Health and Safety Committee. Risks relating to labour rights, employee wellbeing and ethical conduct are managed through Senior Leadership oversight, HR compliance processes, employee engagement activities and ongoing dialogue with employee representatives. Informal consultations and structured committee forums support the continuous review and improvement of workplace practices.

To identify potential modern slavery risks, NEC Europe considers indicators including recruitment practices, employment arrangements, working hours, freedom of association, worker feedback, grievance reporting and relevant ILO forced labour indicators. These assessments are conducted through established governance processes and integrated into NEC's Enterprise Risk Management framework.

During the Reporting Period, no ILO indicators of forced labour were identified within our direct operations, and no concerns relating to modern slavery or human trafficking were raised through the NEC Compliance & Integrity Hotline or other grievance mechanisms. Consequently, no corrective actions or remediation measures were required.

Risks and opportunities were reviewed through ISO-aligned management systems and reported quarterly to the Board and Senior Leadership, supporting transparency, accountability and informed decision-making.

While no significant modern slavery risks were identified within our direct operations during the Reporting Period, we recognise that risks can evolve and therefore continue to monitor and assess potential impacts through our governance, compliance and due diligence processes.

Our supply chain

Although our direct operational exposure is low, we recognise that modern slavery risks may arise within our supply chain.

To further mitigate supply chain risk, NEC Europe applies a structured risk-based due diligence process and assessment to its suppliers and regional technology partners, including pre-engagement screening, contractual compliance clauses and periodic performance reviews. Shared partners managed by NEC Corporation are also subject to group-wide ethical standards and oversight mechanisms, complementing NEC Europe's own supplier management activities.

We continue to enhance our supplier engagement practices through training and awareness, risk mapping, and the integration of internationally recognised frameworks such as the UN Guiding Principles on Business and Human Rights. Our assessment considered a range of risk indicators including geography, sector and supplier category, adverse media and supplier due diligence responses. When we feel we need further information, we strengthen our assessment by assessing subcontracting, agency or temporary labour, migrant labour, recruitment practices, labour providers, worker accommodation, known modern slavery typologies, previous incidents, audit findings, grievance data.

To manage supply chain risks, NEC Europe:

- Applies risk-based due diligence to Tier-One suppliers.
- Assesses 98% of suppliers through its supplier risk management processes and controls.
- Validates employment agencies prior to engagement to help reduce labour-related risks.
- Engages only with reputable professional service providers and technology partners after a thorough vetting process.
- Makes the NEC Compliance & Integrity Hotline available to suppliers as a confidential channel for raising concerns regarding NEC's conduct and business practices.

- Implement corrective action and remediation processes where supplier issues are identified through our supplier corrective action and remedy process. and monitor the implementation of agreed actions.

While the professional services sector is generally considered lower risk for modern slavery than labour-intensive industries, all suppliers are assessed against relevant human rights and modern slavery risk criteria. During the Reporting Period, 99% of newly assessed suppliers were classified as low risk based on our supplier risk assessment methodology.

Modern slavery risk assessments are informed by supplier location, the nature of goods and services provided, relevant ILO forced labour indicators, supplier due diligence outcomes and recognised country and sector risk indicators. Suppliers identified as presenting elevated risks are subject to additional review and enhanced engagement where appropriate.

We also maintain controls to prevent our products, services and technologies from contributing to adverse human rights impacts, including compliance with applicable export control and regulatory requirements.

We have not identified any evidence of undocumented or exploited migrant labour within our direct supplier relationships through our due diligence and supplier management activities.

Based on supplier due diligence, risk assessments, supplier engagement activities, grievance data and internal reviews, NEC Europe assessed its exposure to modern slavery risks across both its operations and direct supply chain as low during the Reporting Period. Nevertheless, we recognise that risks may evolve over time and remain committed to continuously strengthening our due diligence, supplier engagement and risk management processes.

Where adverse human rights impacts are identified, NEC Europe seeks to work with the relevant supplier to implement appropriate remediation measures, which may include corrective actions, improvements to management controls, worker-focused remedies and ongoing monitoring to verify effectiveness.

Controls in Vendor Management

NEC Europe applies a risk-based approach to vendor management to help identify, prevent and mitigate potential human rights, labour rights and modern slavery risks within its supply chain. Controls are applied throughout the supplier lifecycle and include supplier selection controls (onboarding criteria and due diligence), lifecycle controls (removal of inactive suppliers and requalification prior to re-engagement), system controls (contractual requirements and monitoring tools), administrative controls (training and ongoing collaboration) and behavioural controls (a culture of integrity, accountability and respect that guides decision-making and supplier relationships).

Key performance indicators to measure effectiveness of steps being taken

We measure the effectiveness of our modern slavery risk management activities through a range of qualitative and quantitative indicators aligned to our business operations, supply chain profile and due diligence processes.

These measures help us evaluate the effectiveness of our governance, supplier engagement and risk management activities, and identify opportunities for continuous improvement.

During the Reporting Period, our monitoring activities did not identify any instances of modern slavery within our operations or direct supply chain. Based on the indicators outlined below, our controls and due diligence

processes continued to operate as intended during the Reporting Period.

Key observations include:

- **Supplier Screening:** Risk-based due diligence was applied to new suppliers and relevant supplier assessments were completed in accordance with our procurement and supplier governance processes. 100% of new suppliers were screened against relevant human rights and modern slavery risk criteria prior to onboarding (including geography, sector of activity, product and service purchased).
- **Supplier Responsiveness:** Suppliers engaged constructively with our due diligence and compliance activities, and no supplier disengagements or terminations were required because of modern slavery, forced labour, child labour or human rights concerns
- **Supplier Risk Assessment:** 99% of new suppliers were classified as low risk for human rights. One supplier required further review and clarification, after which no significant modern slavery concerns were identified. All supplier reviews were completed in accordance with established procedures. Supplier risk classifications are determined using our internal supplier risk assessment methodology, which considers geographic, sector, labour and governance-related risk factors.
- **Grievance Monitoring:** No modern slavery or forced labour concerns were reported through the NEC Compliance & Integrity Hotline, employee grievance channels or supplier reporting mechanisms during the Reporting Period.
- **Supplier Reviews:** Primarily desktop-based supplier reviews did not identify any modern slavery concerns or significant control weaknesses. During the Reporting Period, we introduced a supplier assessment tool to support the identification of potential red flags during supplier visits.
- **Governance and Oversight:** Human rights and due diligence activities were reported to Senior Leadership on a quarterly basis, supporting ongoing oversight, accountability and review of emerging risks.
- **Remediation:** Where supplier issues are identified, including potential human rights or labour-related concerns, NEC Europe implements corrective action and remediation processes, with follow-up activities to monitor the completion and effectiveness of agreed actions. No circumstances arose requiring formal remediation during the Reporting Period; however, established procedures remain in place to investigate concerns, protect affected individuals and implement corrective actions where necessary.

While our current controls provide assurance, we remain committed to continuously improving supply chain visibility, due diligence and supplier engagement to support effective risk management.

Figure 7 – Key Performance Indicators (KPIs²⁰)

Progress Goal	KPI	Reporting Period	Previous Reporting Period
Leadership and governance	Directors participating in compliance activities.	100%	100%
Communications	Internal communications promoting ethical conduct and responsible business practices	10	10
Supplier coverage	Supplier spend covered by risk assessment.	99%	-
Risk management	Strategic suppliers identified for enhanced due diligence following initial risk assessment.	1	-
Due diligence	New suppliers' disclosures screened for human rights risk based on geography, sector of activity, product and service purchased.	100%	100%
Corrective action	Suppliers requiring enhanced review or additional due diligence	1	0
Remediation	Formal remediation plans issued.	0	0
Effectiveness	Modern slavery concerns raised through formal reporting channels.	0	0
Training and awareness	Completion rate of sustainable procurement and procurement refresher training	100%	99%
Stakeholder engagement	External human rights, responsible business and modern slavery events attended	10	10

No modern slavery concerns were reported during the Reporting Period. Grievance and whistleblowing mechanisms remained available to employees, suppliers and other stakeholders.

Training on modern slavery and trafficking

Our business

NEC Europe promotes responsible business conduct and the prevention of modern slavery through a programme of training, awareness and communication activities for employees and, where relevant, suppliers and business partners. Training content is reviewed annually and updated to reflect emerging risks, changes in legislation, internal learning and stakeholder feedback.

During the Reporting Period, employees received communications relating to the NEC Code of Conduct, Human Rights Policy and compliance requirements through a range of channels, including town halls, e-learning modules, induction programmes and the corporate intranet.

Senior Leadership continued to reinforce an ethical and compliance-focused culture through sustainable procurement training, compliance awareness campaigns, employee induction programmes and access to online guidance resources. These activities supported awareness of human rights, ethical business conduct and

²⁰ The KPIs presented in Figure 7 are aligned, where relevant, to applicable GRI Standards. A detailed GRI cross-reference is provided in Appendix A.

modern slavery risks across the organisation.

Training participation and engagement were monitored throughout the Reporting Period, achieving nearly 99% completion rate for mandatory compliance training. The programme was made available to all employees.

We continue to enhance our awareness programme to ensure employees and relevant stakeholders remain equipped to identify, escalate and respond appropriately to potential human rights and modern slavery concerns.

Our supply chain

We engaged with direct suppliers to promote awareness of responsible business conduct, human rights and modern slavery expectations. Through supplier communications and ongoing engagement activities, approximately 20 suppliers formally acknowledged NEC's responsible business requirements during the Reporting Period.

Stakeholder engagement

NEC Europe does not operate with recognised trade unions; however, we actively engage with employee representative bodies and labour forums, including the NEC European Forum, to support employee representation, consultation and open dialogue on workplace matters.

We regularly seek feedback from customers, suppliers, employees and subject matter experts to help inform our approach to human rights, modern slavery and responsible business conduct. We also respond to customer due diligence requests and support assessments of our compliance with modern slavery and human rights requirements.

As part of our commitment to continuous improvement and the UN Sustainable Development Goals, we participate in external initiatives, industry forums and peer-learning opportunities focused on human rights and modern slavery. During the Reporting Period, this included participation in UN Global Compact Network UK modern slavery statement peer reviews, enabling the exchange of good practice and insights with other member organisations.

Building on participation in prior years, we attended a range of human rights, sustainability and corporate responsibility events hosted by organisations including the UN Global Compact, TechUK and the Japanese Business Council in Europe. These engagements support our understanding of emerging risks, stakeholder expectations, regulatory developments and evolving best practice.

Insights gained through stakeholder engagement, peer reviews and external events have informed ongoing improvements to our training programmes, supplier engagement activities, due diligence processes and internal governance arrangements, supporting the continued development of our approach to identifying and managing modern slavery risks.

Although no incidents of modern slavery were identified during the Reporting Period, NEC Europe maintains procedures to investigate concerns, engage affected stakeholders and implement appropriate remediation measures where necessary.

Looking ahead, our plan

Throughout the financial year ending 31 March 2027, NEC Europe will continue to:

- Publish Modern Slavery and Human Trafficking Statements through recognised reporting platforms to support transparency and accountability.
- Strengthen human rights and modern slavery due diligence processes through ongoing monitoring, supplier engagement and continuous improvement activities.
- Enhance our understanding of forced labour, broader human rights and environmental risks to support a more integrated and risk-based approach to responsible business conduct.
- Improve supply chain transparency through continued supplier engagement, risk assessment and governance activities.
- Align our reporting and disclosures with internationally recognised standards and evolving stakeholder expectations.
- Improve visibility beyond Tier One suppliers through enhanced supplier engagement, review of supplier human rights disclosures, and the collection of additional due diligence information from strategically important suppliers regarding their own supply chain management practices.
- Use the 2025 Transparency in Supply Chains (TISC) Guidance as a reference point to assess the maturity of our approach and identify opportunities for continuous improvement.
- Continue to strengthen awareness and capability across the organisation through training, communications and the sharing of good practice relating to human rights and modern slavery.

Through these actions, NEC Europe aims to further strengthen its approach to identifying, preventing and managing modern slavery risks across its operations and supply chain. We remain committed to supporting ethical and responsible supply chains, respecting internationally recognised human rights, and contributing to wider efforts to combat modern slavery and human trafficking

Appendix A: KPI Alignment to GRI Standards

KPI	Relevant GRI Standard(s)
<i>Directors participating in compliance-related activities</i>	GRI 2-14
<i>Leadership communications promoting ethical conduct</i>	GRI 205-2
<i>Board reporting on ethics, human rights and sustainability</i>	GRI 2-16
<i>ESG topics covered in Board reports</i>	GRI 2-16
<i>Review of human rights, modern slavery and H&S policies</i>	GRI 2-23, GRI 2-24
<i>Purchase orders incorporating modern slavery requirements</i>	GRI 2-23, GRI 414-1
<i>New suppliers assessed for modern slavery risk</i>	GRI 414-1, GRI 409-1
<i>ESG assessments resulting in operational improvements</i>	GRI 2-23, GRI 3-3
<i>Enhanced supplier review undertaken</i>	GRI 414-2
<i>Suppliers classified as high risk</i>	GRI 414-1, GRI 409-1
<i>Strategic supplier reviews</i>	GRI 414-2
<i>Modern slavery concerns reported in own operations</i>	GRI 2-16, GRI 409-1
<i>Modern slavery concerns reported in supply chain</i>	GRI 2-16, GRI 409-1
<i>Supplier onboarding files meeting requirements</i>	GRI 414-1
<i>Sustainable procurement training completion</i>	GRI 2-24, GRI 2-30
<i>Procurement refresher training completion</i>	GRI 2-24, GRI 2-30, GRI 414-1
<i>New employee ethics induction</i>	GRI 2-24, GRI 2-30
<i>Suppliers acknowledging Responsible Business Conduct Guidelines</i>	GRI 2-24, GRI 3-3, GRI 414-1
<i>Human rights events attended</i>	GRI 2-29
<i>UN Global Compact Communication on Progress</i>	GRI 2-22
<i>UN Global Compact Network participation</i>	GRI 2-22, GRI 3-3
<i>Modern Slavery Statement publication</i>	GRI 2-22, GRI 2-25
<i>Supplier ESG engagement activities</i>	GRI 2-29, GRI 414-1
<i>Inclusion and diversity events</i>	GRI 405-1