Modern Slavery Act Policy

Netcompany UK Limited
Introduction and purpose

This statement is pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Netcompany UK Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Netcompany has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

This policy is applicable to the end of the current financial year e.g. 31st December, and will be reviewed annually to ensure continuing compliance with legislation and that it continues to reflect the business commitments.

Our business

Netcompany’s vision is to become the leading digital vendor and digital enabler in Northern Europe by accommodating and accelerating digital transformation for public and private enterprises to support strong and sustainable societies, successful and competitive businesses, better environment and better lives for all of us.

Netcompany is a pure-play next generation IT services company delivering business-critical strategic IT projects that accelerate customers’ digital transformations through digital platforms, core systems and infrastructure services in public and private organisations throughout Northern Europe. Netcompany was founded in 2000 and has its headquarters in Copenhagen, Denmark, with its UK headquarters in Reading. Today, the company is an international company with more than 1,700 employees spread across 9 offices in 5 countries.

Through its innovative and institutionalised business model, Netcompany provides end-to-end IT services from development through to maintenance and operations to a diverse customer base, including large and mid-sized Northern European companies from various industries in the private and public sectors.

Netcompany is committed to making its customers successful. A continual track record of high quality IT deliveries at the right time and to the agreed budget speaks for itself. Furthermore, the company’s approach to talent and career development focuses on attracting and building top talent through an accelerated merit-based career model and rewards high performance. That combination has made Netcompany the market’s most successful IT services company in terms of industry-leading profitable growth and customer loyalty.

Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chain. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and
controls to ensure slavery and human trafficking is not taking place anywhere within our supply chain.

All of our services are underpinned by robust ISO9001:2008 & ISO27001:2013 certified processes and a variety of industry accreditations.

In our Code of Conduct, we provide the general foundation for how we conduct our business and specifically, it is the basis for our CSR strategy. It declares that board members, employees, agents, suppliers, consultants and business partners are obliged to comply with both applicable laws and regulations in the performance of their duties, and in accordance with good business practice, values and ethical guidelines when carrying out their work. We do not tolerate any bribery or corruption and condemn it in all forms.

To prevent bribery and corruption as well as ensuring compliance with national and international rules, we have adopted an anti-bribery and anti-corruption policy. We are committed to doing business in compliance with the policy and with integrity.

Furthermore, our approach to human rights is strongly rooted in our core values and ethical guidelines of being a people-oriented workplace. Our expectation of being an inclusive and equally supporting organisation is guided by the United Nations’ Declaration of Human Rights. The purpose of the guidelines is to provide a basis for our company work with respect to human rights and covers key topics of importance to the company and our employees, such as non-discrimination and protection against harassment. This guidance applies to all employees.

In 2017, we approved a new whistle-blower system, in which employees, members of the Executive Board and Board of Directors, auditors, lawyers, suppliers and other business partners of the company can report serious offences or suspected serious offences. Reports may be submitted anonymously, and they are investigated by an external law firm.

All new employees are made aware that Netcompany does not tolerate bribery and corruption.

Netcompany has not received any reports through the whistle-blower function in 2017.

*Through our Code of Conduct and related anti-corruption activities, we support the UN Global Compact anti-corruption principle 10.*

Netcompany joined the UN Global Compact in January 2013. In accordance with the UN Global Compact’s 10 principles within the categories of human rights, labour, environment and anti-corruption, we undertake to:

1. Support and respect the protection of internationally proclaimed human rights
2. Make sure that it is not complicit in human rights abuses
3. Uphold the freedom of association and the effective recognition of the right to collective bargaining
4. Support the elimination of all forms of forced and compulsory labour
5. Support the effective abolition of child labour
6. Eliminate discrimination in respect of employment and occupation
7. Support a precautionary approach to environmental challenges
8. Undertake initiatives to promote greater environmental responsibility
9. Encourage the development and diffusion of environmentally friendly technologies
10. Work against corruption in all forms, including extortion and bribery
Our suppliers

Netcompany has a long history of working with partner organisations and associates and our business operating model relies on an integrated and seamless service to clients, regardless of which mix of resources is delivering the service.

Netcompany is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker’s working conditions.

Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. Any serious violation of the organisations’ supplier code of conduct with lead to termination of the business relationship.

Due Diligence

As part of our initiative to identity and mitigate risk, we have in place systems to:

- Identify, assess and monitor potential risk areas in our supply chain
- Mitigate or resolve any identified risk of slavery and human trafficking occurring in our supply chain
- Protect whistle-blowers

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year end December 2017.

Mark Ward
Chief Executive