

# NOUS GROUP - MODERN SLAVERY STATEMENT – FY 2022

## Reporting Entity, Structure, Operations and Supply Chain

### Reporting Entity

This statement is for the financial year ending 30 June 2022, and has been approved by the Nous Executive Board (**NEB**) on 29 November 2022 for:

1. Nous Group Holdings Pty Ltd (**Nous Australia**);
2. Nous Group (UK) Ltd (**Nous UK**);
3. Nous Group Holdings (Canada) Ltd (**Nous Canada**);
4. Cubane Consulting Group Pty Ltd (**CCG**);
5. Cubane Solutions Pty Ltd (**CS**);
6. Cubane Consulting Pty Ltd (**CC**);
7. Cubane Consulting (UK) Ltd (**CCUK**); and
8. Cubane Consulting (Canada) Ltd (**CCC**),

together, **Nous Group**).

### Our operations

Nous Group is an international business providing management consultancy and university benchmarking services, with approximately 700 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 (which is simply a holding company).

### 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 HR. 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 to 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 Senior Legal

Counsel 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, there is also minimal risk of modern slavery as our business does not intersect directly with any high-risk industries. We are, however, engaged with high-risk industries indirectly. For example, our building managers engage cleaners to perform cleaning services in our offices.

In FY 21-22 Nous Group placed a specific focus on preventing modern slavery from occurring through its adjacent exposures to high-risk industries associated with its commercial tenancies, as several of Nous Group's tenancy agreements were nearing expiry and requiring the negotiation of new leases and subleases in Australia and Canada. Nous was able to seek contractual commitments from most landlords regarding their modern slavery practices.

Nous Group aims to reduce its risk of engaging in modern slavery in FY 22-23 by developing a process for recording the results of modern slavery audits on FinancialForce, which provides for centralised storage of audit results. Centralised storage will not only enable Nous Group to track and report on the obligations of those suppliers it has audited, but will also simplify the process of identifying which suppliers are yet to be audited.

### **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.

As noted in previous statements, in FYs 20-21, and 21-22 Nous Group built on its implemented modern slavery Policy by evolving its enterprise resource planning infrastructure to track modern slavery compliance within its supply chain by:

1. conducting appropriate due diligence on all contracts, including asking suppliers to provide evidence of a Modern Slavery Statement or to provide more detail of their operations where there may be modern slavery risks;
2. consulting the Senior Legal Counsel, or Head of Information Security and Risk where they are unsure of the risk or are not satisfied with the level of evidence provided by the supplier; and
3. undertaking periodic audits of its supply chain for compliance regarding modern slavery, and maintaining a centralised register of audit outcomes.

To strengthen this process, in FY 22-23 Nous Group will appoint an employee to the role of Nous Group Sustainability Manager tasked with, amongst other things, linking the audits of Nous Group's supply chain and its compliance with modern slavery requirements into a broader sustainability strategy and plan. Previously these audits were intended to be undertaken by various members of Nous Group's corporate staff.

## Consultation for this Joint Statement

This statement is issued on behalf of Nous Australia, Nous UK, Nous Canada, CCG, CS, CC, CCUK, and CCC. This Statement was approved by the NEB which is made up of Nous Group's Managing Principal and CEO, Functional Leads and a selection of 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. CCG, CS, CC, CCUK, and CCC are represented on the NEB by Nous Group's Managing Principal and CEO.


## Other relevant information

Due to integration reasons following the Cubane Group's acquisition by Nous Group, CCG, CS, CC, CCUK, and CCC have not been included in previous Nous Group Modern Slavery Statements. However, as a result of the successful integration of these entities into the Nous Group, these entities will now be accounted for in Nous Group's annual Modern Slavery Statement, and also be subject to the ongoing efforts of Nous Group to monitor its risk, and mitigate the change of modern slavery occurring in its supply chain.

## Conclusion

Any concerns about modern slavery taking place in our business should be raised by emailing [governance@nousgroup.com](mailto:governance@nousgroup.com).

Signed

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Tim Orton

Managing Principal and CEO