

NOUS GROUP - MODERN SLAVERY STATEMENT – FY 2021

Reporting Entity, Structure, Operations and Supply Chain

Reporting Entity

This statement is for the financial year ending 30 June 2021, and has been approved by the Nous Executive Board on 25 October 2021 for:

1. Nous Group Pty Ltd (**Nous Australia**);
2. Nous Group (UK) Ltd (**Nous UK**); and
3. Nous Group Holdings (Canada) Ltd (**Nous Canada**),

together **Nous Group**.

Our operations

Nous Group is an international management consultancy with over 400 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.

Nous Australia, Nous UK and Nous Canada are sister companies, each wholly owned 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.

Building on Nous Groups' FY 19-20 implementation of a Modern Slavery policy, in FY20-21 Nous Group evolved its enterprise resource planning infrastructure, resulting in the successful implementation of FinancialForce, a cloud-based finance system which improves Nous Group's capability to audit and report on its operations, including records of Modern Slavery audits of Nous Group's supply chain.

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 and the Company Secretary 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.

In terms of 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 will place 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 are nearing expiry and require the negotiation of new leases and subleases. We intend to seek commitments from landlords regarding their Modern Slavery practices.

Nous Group will also reduce its risk of engaging in Modern Slavery in FY 21-22 by storing all Modern Slavery audit results on FinancialForce. 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 above, in FY 20-21 Nous Group built on its previously implemented Modern Slavery Policy by evolving its enterprise resource planning infrastructure to track Modern Slavery compliance within its supply chain. This means that in addition to Nous Group employees already:

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; and
2. consulting the Company Secretary, Senior Legal Counsel or Head of Information Security & Risk where they are unsure of the risk or are not satisfied with the level of evidence provided by the supplier;

Nous Group has added a third limb to this compliance regime of:

3. periodic audits of its supply chain for compliance regarding modern slavery, and maintaining a centralised register of audit outcomes.

We have not yet conducted any effectiveness assessments as the documentation infrastructure was not sufficiently mature. However, this is an obstacle which FinancialForce is likely to overcome.

Consultation for this Joint Statement

This statement is issued on behalf of Nous Australia, Nous UK and Nous Canada. This Statement was approved by the Nous Executive Board (NEB) which is made up of our Managing Principal, Functional Leaders 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 the majority of the administrative and support functions for and on behalf of Nous UK and Nous Canada, including providing finance, legal, marketing, and HR assistance. However, the NEB includes a representative from Nous UK and our Managing Principal wears a dual hat representing both Nous Australia and Nous Canada. Nous Groups' presence in Canada continues to grow and, in due course, Nous Group will review the need for a Nous Canada representative to join the NEB.

Other relevant information

Unfortunately, due to COVID-19, in FY 20-21 Nous Group was unable to deliver training sessions in relation to our modern slavery obligations. We aim to provide this training over FY21-22, initially with Nous Group's functional leads as they are most likely to engage with suppliers. We will encourage them to consider:


- whether the goods or services are from a 'high risk' industry;
- where the goods/services are sourced from and whether it's a country that has a higher incidence of modern slavery; and
- where the supplier is based.

We will encourage our functional leads to factor this into their selection processes rather than simply buying from the most competitively priced vendor. We will report on these endeavours in future reports.

Conclusion

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

Signed:

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Tim Orton
Managing Principal and CEO