

NOUS GROUP - MODERN SLAVERY STATEMENT – FY 2020

Reporting Entity, Structure, Operations and Supply Chain

Reporting Entity

This statement is for our financial year ending 30 June 2020, and has been approved by the Nous Executive Board on 23 November 2020 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 approximately 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 that underpins our commitment to examine our supply chains and promote our zero tolerance approach 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 uses partners and suppliers that aim to support the community by employing vulnerable populations. We promote relevant businesses internally and procure from such suppliers for internal purposes and for client work.

Nous works with a range of suppliers across our 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.

In FY 19-20 Nous implemented a Modern Slavery policy to commence the process of raising awareness about Modern Slavery with our functional leads across the business. We have also set up a centralised email address for people to report concerns regarding Modern Slavery and unethical practices at Nous. These concerns will be received by Nous' Information Security and Privacy Officer who will liaise with the 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.

We have, as yet, not specifically addressed these risks with our building managers. In FY 20-21 we aim to implement a due diligence process for new suppliers that we engage.

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

Nous has a zero-tolerance approach to Modern Slavery. While we have always sought to engage with ethical supplies and vendors, we have recognised the need to formalise our policies and procedures as our business has grown both domestically and internationally.

As noted above, in FY 19-20 we implemented a Modern Slavery Policy. We also tightened our processes around contracts, giving clarity to the business about who can sign on behalf of Nous and building in a more robust contract review process. We specifically request that those persons entering in to supply contracts on behalf of Nous:

1. conduct 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. consult the Company Secretary, Legal Counsel or Information Security & Privacy Officer where they are unsure of the risk or are not satisfied with the level of evidence provided by the supplier.

We did not, however, manage to develop or implement a formal Modern Slavery compliance program as was indicated in our last Modern Slavery Statement. We are continuing to focus on managing the impacts of COVID-19 at present, but we will endeavour to have the formal compliance program up and running in future.

We have not yet conducted any effectiveness assessments as we are still in the infancy of establishing such processes.

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 Director, Functional Leaders and a selection of Principals from across the business. 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, marketing, and HR assistance. However, the NEB includes a representative from Nous UK and our Managing Director wears a dual hat representing both Nous Australia and Nous Canada. We have plans to increase our presence in Canada and will, in due course, review the need for a Nous Canada representative to join the NEB.

Other relevant information

In future, we intend to run training sessions in relation to our modern slavery obligations, and initially this will be with our functional leads as they are more likely to engage with suppliers. We will encourage them to consider:

- Whether the goods or services are from a 'high risk' industry;

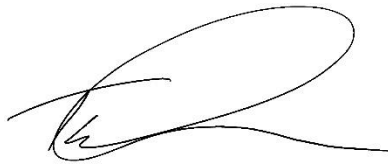
- Where the goods/services are sourced from and whether it's a country that has a higher incidence of modern slavery; and
- Where the supplier is based.

We will encourage our functional leads to factor this in to 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:



Tim Orton
Managing Director