

NSC Group Voluntary Statement for the prevention of & reporting of modern slavery

June 2024

Introduction

Nicholson Sheehan Consulting Pty Ltd as trustee for Nicholson Sheehan Consulting Unit Trust ABN 20 572 675 682, registered office 100 Walker Street North Sydney NSW 2060 ('NSC Group'), a specialist management consulting business, recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will take all reasonable actions to prevent slavery, slavery-like practices and human trafficking within its business and within the supply chains through which it operates.

This statement addresses NSC Group's obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ('the Act') and applicable state legislation and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. NSC Group is known for fairness, and quality advice and service which respects the rights and dignity of our client's and our own people. It is our intention to maintain and grow this reputation.

NSC Group does not have a statutory responsibility to maintain or submit a modern slavery statement. However, we have decided to provide leadership and establish a Modern Slavery Statement.

NSC Group Structure & Operations

NSC Group is an Australian private unit trust that is a wholly owned by its Australian unit holders. We are a distributed consulting firm with consultants located from Darwin in the north of Australia to Melbourne in the south. We are managed by three directors, all of whom are residents and Australian citizens. NSC Group consultants are highly experienced, management consulting independent contractors who sub-contract their services to NSC Group. Our consultants are resident in Australia and are Australian citizens.

We are management consultants specialising in high performance organisational systems, strategic branding and marketing, research and analytics, and business planning and advice. We have advanced skills in enterprise leadership and agility, disruption, aviation safety and security, change management, mergers and acquisitions, work health & safety, organisational reviews, remuneration, and human capital management consulting.

NSC Group has one subsidiary company, NSC Group IP Pty Ltd ACN 659 322 531 which holds the intellectual property of the Group and assigns the right to utilise that property to NSC Group. NSC Group does not trade under any other entity.

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude, and slavery. As responsible management consultancy, NSC Group takes its responsibility as an industry leader seriously. Our internal processes and seniority of our consultants ensures we are alert to the signs of exploitation, so that we may take the necessary action promptly and effectively should it be identified. Our client industry sectors that may be affected include hospitality, education, health, and social care.

NSC Group supply chains & risks of modern slavery.

NSC Group's Suppliers

NSC Group has suppliers who provide goods and services to assist with the daily operation of the business, including IT service providers, telecommunications companies, stationery and office supplies, property management companies (who provide cleaning services to the serviced offices).

NSC Group acknowledges that within our client industries and supply chains there is a risk of modern slavery practices being present. We expect our suppliers to act with the highest ethical standards and to implement only lawful practices. We also expect our suppliers to promote similar standards in their own supply chain.

Clients

NSC Group chooses to only work with clients who maintain and demonstrate high ethical and legal standards in their business. Leading businesses seeking sound management consulting advice and service will acknowledge the importance of their workforce, recognising, rewarding, respecting, and protecting the human rights of their employees and contractors, and protecting their health and safety at work.

As part of our commitment to identify and eradicating slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations. We will use best endeavours to procure from our suppliers that act in full compliance with the Act. We will use best endeavours to separately encourage that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chains are communicated to us.

Supplier Evaluation

NSC Group evaluates its suppliers prior to engaging with them. Our process is to seek out suppliers who openly hold values, standards, and operational practices similar to NSC Group. We have committed to reviewing our suppliers' websites and public statements to ensure

they are respectful businesses actively recognising, respecting, and protecting the human rights of their employees, contractors, and those of their suppliers and business partners and the communities affected by the suppliers' operations.

NSC Group's position on Supplier conduct is that:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- All employees must be provided with a clear contract of employment, which complies with State, Territory and Commonwealth legislation.
- All employees must be treated in a fair and equal manner and with dignity and respect.
- Any form of discrimination, victimisation, or harassment on any prescribed grounds under Commonwealth, State or Territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.
- All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships.

Cooperation with client due diligence

NSC Group works with a range of clients in the private and public sectors across many industries and which range in size from small businesses through to large organisations and government entities. NSC Group is familiar with participating in clients' audits of their respective supply chains. In doing so, NSC Group is also able to observe its clients' own practices on the prevention of modern slavery.

Engagement with suppliers

NSC Group engages with its suppliers closely. Many of our suppliers are personally known to us. We regularly interact with them about the key issues we are acting on and encourage them to join us on the journey.

Reviewing contractual documentation

NSC Group regularly reviews its standard contract with clients and is currently reviewing it to include specific references to modern slavery law compliance.

Ability for employees to raise concerns at work

NSC Group people are senior practitioners, many of whom conduct their own businesses in their professional industries. Our people are encouraged to speak up about inappropriate conduct in our business or our clients or suppliers' businesses. We are a highly inclusive business in which consultants are a critical element. Their opinions and concerns matter to us.

Training

Our people are expected to comply with all laws and act in accordance with our policies and processes. Our people are highly skilled professionals who have standing in their professional associations. Their professional reputation and integrity are important. They are expected to always act to the highest standards of our profession. Comply with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies to ensure our people have access to additional information and support required on human trafficking, forced labour, child labour, servitude, and slavery.

Assessing the effectiveness of the actions taken

NSC Group is new to taking action to prevent and report modern slavery. We intend to establish a measurement regime and reporting of our efforts during the coming year.

Publish changes made to NSC Group's client contracts

During the financial year 2024-25, all new client contracts for advice and service will include specific references to modern slavery law compliance.

Improving our practices

During the next 12 months, NSC Group will continue to identify actions we can implement to reduce the risks of modern slavery.

Over the next 12 months, NSC Group will:

- Engage with all our suppliers to evaluate their policies and practices to eliminate modern slavery.
- We will ensure all our client contracts include specific references to modern slavery law compliance.

This statement is made pursuant to the Act and constitutes NSC Group's voluntary slavery and human trafficking statement. The statement is approved by the NSC Group's board of directors.

Signed: Patrick Sheehan

Position: Managing Director

NSC Group