

## **NETCRACKER TECHNOLOGY EMEA LIMITED**

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## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**



- 1. PURPOSE.** This Modern Slavery and Human Trafficking Statement (the “Statement”) is published pursuant to Section 54 of the UK Modern Slavery Act 2015, by NetCracker Technology EMEA Limited, company number 02412849, duly registered in England and Wales (the “Company”). The purpose of this Statement is to outline the steps the Company has taken, and continues to take, to identify, prevent, and mitigate the risks of modern slavery and human trafficking within our organization and our wider supply chain. It reflects our dedication to promoting transparency, accountability, and ethical practices across our business operations. This Statement relates to the financial year from 1 April 2024 to 31 March 2025. It was approved by the Board of Directors of the Company on August 13, 2025.
- 2. ABOUT OUR BUSINESS.** NetCracker Technology EMEA Limited is headquartered in the United Kingdom. It’s a wholly owned subsidiary of NetCracker Technology Corporation, which is registered in the Commonwealth of Massachusetts, United States, and is itself a wholly owned subsidiary of NEC Corporation, a global provider of technology products, services and solutions headquartered in Japan. The principal activity of the Company is the provision of information technology consultancy services and support for OSS and BSS software for telecommunications providers. Further information on our activities can be found on Netcracker’s website at: <https://www.netcracker.com>. Our personnel primarily consists of professionally trained and highly qualified individuals, contributing across various roles, including software development, engineering, project management, customer support, sales, and administrative functions.
- 3. ABOUT OUR SUPPLY CHAIN.** Most of our suppliers are in low risk sectors such as professional services providers, including consultants and advisors, from small to medium size or with global reach, with regional offices in the European Economic Area. The suppliers for our operations outside the European Economic Area are typically contracted centrally through our parent company in the US. We don’t engage in any manufacturing activities. We prioritize the protection of human rights within our supply chain and require our suppliers to abide by Netcracker’s Supplier Code of Conduct. Suppliers are encouraged to self-evaluate and make improvements to meet or exceed our expectations as reflected in our policies.
- 4. POLICIES IN RELATION TO PROHIBITION OF SLAVERY AND HUMAN TRAFFICKING.** At Netcracker, we are committed to upholding the highest standards of ethical conduct and integrity in all aspects of our business. This commitment extends to ensuring that modern slavery and human trafficking have no place in our operations or supply chains. We are dedicated to complying with the fundamental principles of the Universal Declaration of Human Rights and will not engage with or support any business known to be involved in forced labor, child labor, or human trafficking. We have implemented the following polices to protect against the risks of slavery and human trafficking:

<p><b>Netcracker Code of Ethics and Standards of Conduct Policy</b></p>	<p>The purpose of this Code of Conduct is to establish a clear set of ethical principles and behavioral standards that guide the actions and decisions of all employees within the Company. The Code requires compliance with the Universal Declaration of Human Rights and other international human rights standards.</p>
<p><b>Netcracker Equal Employment Opportunity Policy</b></p>	<p>This policy promotes a diverse and inclusive workplace by prohibiting discrimination and fostering an environment where all employees are treated with respect and have the opportunity to succeed based on their skills and qualifications.</p>
<p><b>Netcracker’s Supplier Code of Conduct</b></p>	<p>This Code of Conduct explicitly prohibits trafficking in persons or using any form of child, slave, forced, bonded, indentured or involuntary prison labor in our supply chain.</p>
<p><b>Netcracker Health &amp; Safety Policy</b></p>	<p>It is Netcracker’s policy to ensure, as far as practicable, the health, safety &amp; well-being of persons who may be affected by our operations.</p>
<p><b>Netcracker Know Your Third Party Policy</b></p>	<p>The purpose of this Policy is to establish a framework for evaluating and managing the risks associated with engaging third-party entities to ensure that these third parties adhere to the Company's ethical standards, legal requirements, and operational expectations.</p>
<p><b>Netcracker Whistleblower Policy</b></p>	<p>The purpose of the Whistleblower Policy is to provide a safe and confidential way for employees to report any unethical, illegal, or improper conduct within the organization including any concerns relating to modern slavery or human trafficking.</p>

As part of the wider NEC Group, we also support and adhere to the NEC Group policies including the following:

<b>NEC Way</b>	The NEC Way is a common set of values that form the basis for how the entire NEC Group conducts itself.
<b>NEC Group Code of Conduct</b>	This policy requires compliance with the Universal Declaration of Human Rights and other international human rights standards.
<b>NEC Group Human Rights Policy</b>	The policy stipulates the requirement of respect for fundamental human rights in all situations by everyone, from NEC Group officers to employees.
<b>NEC Group’s Modern Slavery and Human Trafficking Statement</b>	The purpose of this statement is to confirm NEC Group’s commitment to preventing modern slavery and human trafficking within its operations and supply chains.

We remain committed to continuously improving our policies and procedures to ensure that we not only meet but exceed our responsibilities in the critical area of prevention of modern slavery and human trafficking.

5. **ANNUAL COMPLIANCE TRAINING.** All Company policies and guidelines are posted on Netcracker’s Compliance Portal and are available to all Netcracker employees. The Company conducts comprehensive annual compliance training for all new and existing employees, covering a range of key topics, including respect for human rights, the prohibition of forced labor, child labor, human trafficking, responsible procurement, and diversity and inclusion.
  
6. **DUE DILIGENCE PROCESSES AND RISK ASSESSMENT.** The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with Netcracker Know Your Third Party Policy. We carefully evaluate the companies that we work with to assess and mitigate risks associated with unethical practices, legal non-compliance, or reputational harm. This comprehensive, multi-step due diligence process ensures that our third-party relationships align with our ethical values and standards, meet legal requirements, and support our business objectives. Once a supplier has successfully completed this process and is approved for engagement, we expect them to adhere to Netcracker’s Supplier Code of Conduct. In addition to the due diligence process, we have also implemented NEC Group’s Supplier Hotline for Misconduct in Supply Chain allowing employees to report any suspected violations of relevant laws or company policies by our suppliers. Furthermore, we have established Netcracker Compliance & Ethics Committee which is responsible for implementation and enforcement of Company policies, promoting awareness and understanding of human rights issues, and

providing oversight to ensure that the Company is held accountable for maintaining a strong culture of compliance and ethics.

7. **KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS.** To assess the effectiveness of our efforts to combat modern slavery and human trafficking, we track the following key performance indicators:

<b>Instances of Modern Slavery Identified</b>	We are pleased to report that the number of modern slavery instances identified within our operations or supply chain as of the date of this Statement is zero.
<b>Employee Compliance Training Completion Rate</b>	We have achieved a 95.64% completion rate for our annual compliance training, which includes modules on human rights, the prohibition of forced labor, child labor, human trafficking, responsible procurement, and diversity and inclusion.

8. **LOOKING AHEAD.** As we move forward, we remain committed to refining our risk identification and due diligence processes. We will continue to review and update our policies and training materials, ensuring that our employees, especially those in procurement roles, are well-equipped and prepared to identify and mitigate potential risks associated with modern slavery. Through these ongoing efforts, we strive to uphold the highest standards of ethical conduct and contribute to the global fight against modern slavery and human trafficking.

August 13, 2025

NetCracker Technology EMEA Limited



Steven Reed, Director