

AI in Hiring – Candidate Policy

Responsible use of artificial intelligence in recruitment

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(Public)



What is this?

This policy explains how NCC Group may use approved artificial intelligence (AI) and AI-enabled recruitment technologies as part of its recruitment process. It outlines how these technologies support recruitment activities, the safeguards applied to their use, and the rights available to candidates.

AI may be used to support activities such as candidate sourcing, application screening, interview administration, candidate communications, and the organisation of recruitment information. AI is used to support recruitment decisions and does not replace appropriate human oversight.



Who does it apply to?

This policy applies to:

- External candidates applying for employment opportunities with NCC Group.
- Internal candidates applying for a new role or opportunity within NCC Group.
- Prospective candidates identified or contacted by NCC Group through candidate-sourcing activities.

The rights and safeguards described in this policy may vary depending on the laws that apply in the country or location where the recruitment activity takes place.

This policy does not provide guidance for Talent Acquisition, hiring managers, People Partners or other colleagues involved in recruitment. Their responsibilities are covered separately within NCC Group's internal AI in hiring policy and supporting guidance.



What are the key points?

- NCC Group may use approved AI-enabled technologies to support parts of the recruitment process.
- AI outputs are used as decision-support and are subject to appropriate human oversight.
- AI-enabled tools assess candidates against predefined, job-related criteria set by hiring teams.
- NCC Group does not permit AI to be used in ways that create or reinforce unlawful discrimination.
- AI-enabled recruitment technologies are subject to appropriate due diligence, risk assessment, security review, and governance before deployment.
- The performance of AI-enabled recruitment systems is monitored for effectiveness, accuracy, fairness, and potential bias.
- Special category data is not used by AI-enabled tools to rank, match, screen, or assess a candidate's suitability for a role.
- Candidates can ask questions about the use of AI and may have additional rights under applicable local laws



What action should I take?

Candidates can contact us via:

Talent Acquisition Team: global.ta@nccgroup.com

Privacy Team / Data Protection Officer: dataprotection@nccgroup.com

Foreword

This is version 1.0 of NCC Group's AI in Hiring Candidate Policy, issued by the Talent Acquisition team.

This policy explains NCC Group's approach to using AI-enabled technologies when recruiting internal and external candidates. It provides candidates with information about how these technologies may be used, the safeguards applied and the rights that may be available to them.

Separate internal policies and guidance set out the responsibilities of Talent Acquisition, hiring managers, People Partners and other colleagues involved in recruitment.

This policy should be read alongside NCC Group's Recruitment Privacy Notice and will be reviewed periodically to reflect changes in our recruitment practices, technology, applicable laws and governance requirements.

Purpose

NCC Group recognises that AI-enabled technologies can support a more efficient and consistent recruitment process when used responsibly and with appropriate safeguards.

The purpose of this policy is to:

- Explain where AI-enabled technologies may be used during the candidate recruitment journey.
- Explain the role of human oversight in recruitment outcomes.
- Set out NCC Group's approach to fairness, inclusion, transparency, privacy and data protection.
- Explain how candidate information may be processed by AI-enabled recruitment technologies.
- Provide internal and external candidates with information about their rights and how to raise questions or concerns.

Policy

Automated Processing and Human Review

As part of our recruitment process, NCC Group may use approved AI-enabled technologies to support activities such as candidate sourcing, application screening, interview administration, candidate communications, and organising recruitment information.

These tools may help identify, match, rank, or screen candidate information against predefined, job-related criteria set by our recruitment team, including skills, experience, qualifications, and other relevant application information.

AI outputs are used as decision-support within NCC Group's recruitment process. Candidates will not be progressed to interview, invited to complete a further assessment, or offered employment without appropriate human oversight. Where AI-supported screening indicates that an application should not be prioritised or progressed, this remains subject to NCC Group's approved recruitment process, safeguards, governance, and review rights where required by applicable law.

AI outputs are used as decision-support only. Candidates will not be progressed to interview, invited to complete a further assessment, or offered employment without appropriate human oversight.

Where an application is not prioritised or progressed following AI-supported matching, ranking, or screening, this will be managed within NCC Group's approved recruitment process and remain subject to appropriate safeguards, governance, and review rights where required by applicable law. NCC Group remains responsible for how AI-supported information is used in recruitment outcomes.

AI Systems and Recruitment Technology Solutions

NCC Group may use third-party Recruitment Technology Solutions (RTS) incorporating AI functionality to support recruitment activities. These systems operate in accordance with NCC Group's instructions and approved recruitment processes.

Prior to deployment, AI-enabled recruitment technologies are subject to appropriate due diligence, risk assessment, security review, and governance processes to ensure they are suitable for use and operate in a manner consistent with applicable legal, regulatory, and ethical requirements.

NCC Group regularly monitors the performance of AI-enabled recruitment systems to assess effectiveness, accuracy, fairness, and potential bias. Where material issues are identified, appropriate corrective action will be taken, including modifying, restricting, or discontinuing use of the relevant technology.

Personal data processed through AI-enabled recruitment technologies is only used for the recruitment purpose for which it was collected and is not used by NCC Group or its providers to train or improve general-purpose AI models unless candidates are explicitly informed and a lawful basis exists for such processing.

Automated Decision-Making

NCC Group may use AI-enabled tools to support the initial sifting, matching, ranking, or screening of CVs and applications. In some circumstances, this may mean an application is not prioritised or progressed for further human review where it does not meet predefined, job-related criteria or where stronger-matching applications are identified.

NCC Group does not make recruitment decisions based solely on automated processing where this would result in a legal or similarly significant effect on a candidate, unless permitted by applicable law and subject to appropriate safeguards. Where applicable laws provide such rights, candidates may request additional information about the role of AI in the recruitment process and may request meaningful human review of decisions affecting their application.

How AI-Assisted Assessments Work

AI-enabled recruitment tools are configured to assess candidates against criteria that are relevant to the requirements of the role. These criteria may include qualifications, professional experience, technical skills, certifications, responses provided during the application process, and other job-related information.

AI tools are not intended to make judgments about personal characteristics unrelated to the requirements of the role.

Fairness and Inclusion

We are committed to fair, objective, and inclusive recruitment practices. We expect any AI tools used within recruitment to support job-related assessment criteria, and we do not permit the use of AI in ways that create or reinforce unlawful discrimination.

We are committed to providing reasonable adjustments throughout the recruitment process. If you require support, accessibility accommodations, or an alternative recruitment process, please contact the Talent Acquisition team and

Status

Where it is necessary to review or update our people policies, we will do so to reflect changes in our people needs and to remain aligned with changes in the law. Our people policies guide our practices which evolve with the business and so they don't form part of your terms and conditions.