

# Modern Slavery Policy /



This policy is made pursuant to the Modern Slavery Act 2015 section 54(1),  
Transparency in Supply Chains.

## Introduction

Novus is a leading property maintenance contractor, working in the public and private sector across the UK. The company's core service offering of new build, refurbishment & responsive maintenance is based on long-term partnership contracts and tendered work.

Novus has an annual turnover in excess of £100M.

## Policy Statement

Modern slavery is a violation of an individual's human rights. It takes various forms such as slavery, servitude, human trafficking and forced labour and is unacceptable in a modern society.

This statement sets out the steps that Novus Property Solutions Limited [the Company] has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or its supply chain partners.

Novus are committed to acting ethically and with integrity and transparency in all business dealings and putting effective systems and controls in place to safeguard against any form of modern slavery acts. The Company has a zero tolerance approach to any form of modern slavery.

## Supplier Adherence to Novus Values

Our supply chain, both supplier and subcontractor, have been identified as presenting a risk of involvement in modern slavery and human trafficking.

The company expects all those in its supply chains for materials, services and labour, to comply with its policies and values. The company maintains an approved supplier list and conducts due diligence on all suppliers that apply to become approved.

These include:

- ◆ Access to an online search facility to check an organisation has not been convicted of offences relating to modern slavery;
- ◆ On site audits;
- ◆ The Novus Modern Slavery statement is given to new suppliers when they become approved by Novus;

In addition to the above as part of the approval process we require that they confirm to us that:

- ◆ They have taken steps to eradicate modern slavery within their business and they hold their own suppliers to account over modern slavery;
- ◆ (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate);

- ◆ (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations;

The company will not support or deal with any business knowingly involved in slavery or human trafficking and will terminate the contract at any time should any instances of modern slavery come to light.

## **Our Policies**

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. Many of the Company's existing policies are relevant in ensuring that there is no slavery or human trafficking within any part of the business or supply chains.

These include:

- ◆ Recruitment Policy;
- ◆ Equality & Diversity Policy;
- ◆ Disclosure Policy;
- ◆ Disclosures in the Public Interest (Whistleblowing) Policy;
- ◆ Supply Chain Management Policy;
- ◆ Code of Business Conduct;
- ◆ Subcontractor Handbook;

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking the company regularly conduct training for all relevant members of staff in particular our procurement/buying and HR teams.

## **Compliance Methods**

To measure the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain we use the following:

- ◆ Completion of Audits by Directors, Managers Safety Managers and Safety Advisors;
- ◆ Use of structured payment systems and procedures;
- ◆ Hold close communication with second tier supply chain gaining an understanding of their compliance to our policies
- ◆ Investigation of any reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified;
- ◆ Signatory to a Construction Working Rule Body;
- ◆ Periodic reviews to ensure compliance to minimum and living wage requirements;

## **Responsibility for the Policy**

The board of Novus Property Solutions Limited has overall responsibility for the implementation of this policy and are committed to ensuring this policy is communicated and understood throughout the business.