



Modern Slavery Policy /

Policy Scope: This policy relates to all employees and suppliers. It is particularly relevant to all those responsible for the employment of staff, or procurement from the supply chain.

This policy is made pursuant to the Modern Slavery Act 2015 section 54 (1)

Novus are committed to acting ethically and with integrity and transparency in all business dealings, putting effective systems and controls in place to safeguard against any form of modern slavery acts. The company will not accept any form of modern slavery and encourages our people to support us in this.

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 has no place in a modern society.

The policy must be updated annually within six months of the year end, which is 31 December.

This document details the steps Novus has taken to address modern slavery and is set out under the six headings in keeping with the Home Office's statutory guidance.

Structure and supply chains

- We operate in the construction industry, with a seasonal peak in the summer months.
- We have nine operating divisions and are a wholly owned subsidiary of JSSH Limited.
- We procure our goods within the UK, from UK based suppliers, with a limited number of exceptions which are European based.
- The supply chain is relatively complex with a proportion of our work delivered by subcontractors. The material suppliers import an element of their supplies to Novus.
- Our operating model is to provide construction services to UK based customers.
- We do not recognise a trade union, but are a member of the Working Rule Agreement. This is a collective agreement negotiated by Unite and the industry's employers.

Policies on Modern Slavery

- We commit to paying our trade colleagues in accordance with the Working Rule Agreement. All other staff are paid at least the National Minimum and Living Wage.
- We endeavour to pay our supply chain promptly and to terms, recognising the benefits of developing long term relationships for the prevention and detection of modern slavery.
- Our terms and conditions require our supply chain to adhere to the requirements of the Modern Slavery Act 2015, and breaches could trigger contract termination.
- We require our supply chain to comply with our policies and values, and the Modern Slavery Policy is made available to them.
- We maintain an approved supplier list and any identified breaches of the Modern Slavery Act 2015 will result in a supplier being removed.
- To obtain approval a supplier must confirm that:
 - They take steps to eradicate modern slavery within their business and supply chain.
 - They pay their employees at least the appropriate National Minimum and Living Wage.
- We will not support or deal with any business knowingly involved in modern slavery.
- We have a number of policies in place to ensure that business is conducted in an ethical and transparent manner. Many of the company's existing policies are relevant in ensuring that modern slavery does not occur within the business or its supply chain:
 - Equality & diversity policy
 - Employee safeguarding policy
 - Whistleblowing Policy
 - Business Ethics Policy
 - Subcontractor Handbook



Due diligence processes

- Concerns over the potential existence of modern slavery will be taken extremely seriously and investigated in accordance with Novus' Whistleblowing Policy.
- Our senior managers perform routine site inspections.
- Our immediate supply chain receives communications on industry issues, including modern slavery.
- Our materials preferred supplier list works to consolidate our volumes towards reputable suppliers.
- Adverse media monitoring is in place on key suppliers to ensure swiftness of response.
- Routine checks are performed on National Minimum and Living Wage compliance.

Assessing and managing risk

- Few of our immediate supply chain are from outside the UK.
- Our adherence to the minimum wage and Working Rule Agreement mitigates the risk of short paying employees.
- There is an element of risk in our second tier supply chain over which Novus has less immediate control.

Performance indicators

- We have a focus on best value as opposed to selecting the cheapest supplier.
- We monitor our training statistics to track the delivery of Business Ethics training which incorporates modern slavery.

Training

- Staff that influence procurement decisions are provided with Business Ethics training which incorporates modern slavery.
- All staff and subcontractors have access to the Modern Slavery Policy.

Responsibilities

All staff are responsible for ensuring that the minimum standards established within this policy are adhered to in line with their specific role and responsibilities.

All employees will co-operate with any measures introduced to detect instances of modern slavery and report any concerns.

The Finance Director is responsible for the maintenance, regular review and updating of this policy.

Anyone breaching this policy will face disciplinary action, and where warranted this will include dismissal for gross misconduct.

Authorised by

Neil Washington

Neil Washington – Finance Director

Document History

Version	Issue Date	Review Date	Author	Comments
Version 1.0	28/05/2019	28/05/2020	Neil Washington	Annual policy review