

Modern Slavery and Human Trafficking Statement

- 1 Modern slavery is a term used to include slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where someone procures or arranges the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
- 2 Our policy applies to everyone working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.
- 3 Noviu strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.
- 4 The Company will uphold the requirements of the Modern Slavery Act 2015.
- 5 Under current legislation, the Company is not required to prepare an annual statement in respect of slavery and human trafficking. However, in the best interests of transparency and good practice the Directors have considered those requirements in relation to the Company.
- 6 Considering the Company's size, organisation and employment procedures, the Directors have conducted an audit and assessed the risks and are confident that the Company complies in all respects.
- 7 The Company is committed to the highest level of ethical standards and sound governance, and sets high standards of integrity and objectivity for its employees and in its business dealings.
- 8 Where relevant, staff will be trained on how to recognise the signs of modern slavery within the Company's supply chain and how to respond to them. Furthermore, the Company incorporates into its commercial agreements with its suppliers the requirement that they have a suitable modern slavery policy and to verify compliance.
- 9 The Company will not tolerate any form of slavery or human trafficking.
- 10 We call upon all organisations we engage with to influence their supply chains by improving accountability and together help eradicate the injustice and brutality of modern slavery and human trafficking.
- 11 Noviu carry out appropriate passport and visa checks to ensure all employees are entitled to work in the UK in accordance with sections 15-25 of the Immigration, Asylum & Nationality Act 2006 and Government guidance. Should a non-UK resident apply to work with us, a scanned image of their work visa as well as their passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question. All employees are appointed on terms set out in contracts of employment, covering all matters as required under UK employment law. Noviu's Prevention of Illegal Working Policy sets out the checks and controls we undertake.
- 12 Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment. The termination date of the employee's contract of employment would be stated in the contract to align with any expiry date of their work visa.

- 13 We will use the following methods to measure how effective we have been to ensure that slavery, human trafficking and the use of illegal workers is not taking place in any part of our business or supply chains:
- Completion of internal audits.
 - Use of labour monitoring and payroll systems.
 - Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.
 - Annual senior management review of this policy statement.
 - No breaches of this policy statement have occurred to date. Were breaches to be experienced, the reason for same would be considered by the Board and the policy and procedures amended to mitigate the likelihood of any future breaches.
- 14 Novium will undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. All sub-consultants are checked for their bona fides and their compliance with the modern slavery provisions under UK law.
- 15 Training in this policy statement is given to managers involved in the recruitment and employment of staff.
- 16 This policy is regularly reviewed and updated as necessary. The Company endorses this policy and is fully committed to its implementation.



Andy Wiggins
Managing Director



Matt Golds
Managing Director

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