
MODERN SLAVERY



Written & prepared by

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1.0 Version History & Control Authority

This is a controlled document issued under the authority of the Managing Director of Nova Management Services Ltd (Nova). Any copies produced in-house must be clearly marked as Uncontrolled Copy. Any amendments will be by whole page or whole document only.

Version Number	Date of Issue	Record of Change/Replacement
NMS/2023/001	12/01/2023	Issued to NMS as sample.
NMS/2023/001	17/01/2023	Approved by Nova Managing Director issued for inclusion on Noval website

2.0 Equality Impact Assessment Form

Nova aims to design and implement policies that meet the diverse needs of our workforce, in accordance with the Equality Act 2010, ensuring that none is placed at a disadvantage over others. Any supporting Modern Slavery Policy Statement information will be screened to promote equality of opportunity for all.

	Does the policy/guidance affect one group less or more favourably than another on the basis of: -	Yes or No	Comments
1.0	Race, Ethnic origin, and Nationality	NO	
2.0	Age	NO	
3.0	Religion, Belief or Culture	NO	
4.0	Disability – mental or physical	NO	
5.0	Sexual orientation	NO	
6.0	Is there any evidence that some groups are affected differently?	NO	
7.0	Is there a need for external or user consultation?	NO	
8.0	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable	NO	
9.0	Is the impact of the policy/guidance likely to be negative?	NO	
10.0	If so can the impact be avoided	N/A	
11.0	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
12.0	Can we reduce the impact by taking different action?	N/A	
13.0	Human Rights	NO	

3.0 Copyright & Intellectual Property Statement

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The acceptance of this document for the purposes of information relating to Modern Slavery Policy Statement shall imply an agreement on the part of the recipient not to use it for any other purpose and observe the forgoing conditions

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4.0 Introduction

Nova is committed to the continuous improvement of our practices to combat slavery and human trafficking. Nova team members are responsible for being aware and alert to the risks of forced labour and human trafficking in our business and our supply chain and are expected to report concerns to our management, which is expected to act upon them.

5.0 Our Supply Chains

Our key supply chains involve procuring a wide variety of goods and services. Our suppliers are often well established and have a history of responsible trade with Nova.

The evaluation and selection of suppliers for Nova's supply chain is based on the supplier's ability to provide goods that meet the required technical specifications as well as the need for satisfactory quality and service performance. These requirements are necessary to satisfy the movement of goods through the supply chain to fulfil Nova's own customer expectations.

6.0 Our Policy on Slavery and Human Trafficking

This anti-slavery policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to help ensure slavery and human trafficking is not taking place anywhere in our supply chains.

7.0 Due Diligence Processes for Slavery and Human Trafficking

Our goal is to build long standing relationships with suppliers and regularly visit those suppliers and make clear our expectations of business behaviour. We expect these suppliers to have suitable anti-slavery and human trafficking policies and processes and conduct due diligence in their respective supply chains. As part of our induction program, new suppliers are required to disclose the programs and policies that are in place in their supply chain to combat slavery and human trafficking.

8.0 Supplier Adherence to our Values

We have zero tolerance for slavery and human trafficking in our business. In connection therewith, we have modified our terms and conditions of purchasing to require compliance with the Modern Slavery Act 2015, and provide for the immediate termination of the agreement in the event that we become aware that the supplier engages in any behaviour in violation of the Act.

9.0 Training

All Nova team members are trained on and are required to certify on an annual basis their understanding and compliance with the company's business conduct guidelines, which requires all team members to operate with the highest ethical, moral, and legal standards.

Nova also provides additional guidance on slavery and human trafficking to its procurement professionals to improve their knowledge of issues relating to human rights and supply chain working conditions.

10.0 Our Effectiveness in Combating Slavery and Human Trafficking

Nova reviews and develops its policies, procedures, systems, and controls to help ensure ethical practices and effective compliance is present in all of its business operations. In addition to a review of the effectiveness of the steps we have taken to combat slavery and human trafficking in our supply chains, we plan to initiate the following further steps: -

- a) Applying a risk based approach to the review of suppliers within our supply chain and certification by them of compliance with the Modern Slavery Act 2015
- b) Continuing communication and personal contact with relevant team members within the purchasing organisation to facilitate their understanding of, and compliance with, company expectations.
- c) Reviewing and enhancing training available to the purchasing organisation to encourage further understanding of instances of modern slavery and human trafficking and compliance with the Modern Slavery Act 2015.

Signed by:

Mara Alves
Founder & Managing Director

Dated:

17th January 2012

This statement has been approved by the Board of Directors of Nova Management Services Limited and although not required to comply with it due to the financial requirements of the Act, it is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement.