

QD014- Modern Slavery Act Transparency Policy

Statement for Novus Integrated Ltd

OPENING STATEMENT FROM SENIOR MANAGEMENT

Novus Integration Ltd is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on all our suppliers.

Our supply chain is relatively small and generally UK based, we ask all of our suppliers to complete our new supplier form prior to working with our business where we communicate our expectations in relation to modern slavery and human trafficking to them.

The components our suppliers source from outside the UK are generally supplied through businesses such as Honeywell and Siemens, who have clear policies in this area. We consider the processes and measures we have in place to be effective, however they are reviewed on a periodic basis.

This policy is our only policy statement on modern slavery and human trafficking.

STRUCTURE AND SUPPLY CHAINS

Novus Integration Ltd is a Building Energy Management and Refrigeration Monitoring System business, we work in the Retail, Education and Commercial Building sectors in the UK. The following web link provides more information regarding the nature of our business www.novus-integration.co.uk.

The nature of our business requires that we work in conjunction with a range of suppliers, the suppliers are all UK based and provide services such as control system hardware, building control system field devices and control panel manufacture.

POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

We ensure our suppliers are aware of our statement and encourage them to adopt the same high standards.

DUE DILIGENCE PROCESSES RELATING TO SLAVERY AND HUMAN TRAFFICKING

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Scrutinise any identified areas of risk within our business and supply chains
- · Adopt a zero tolerance approach to slavery and human trafficking throughout the organisation and our supply chains
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

QD014 Issue No./Date



QD014- Modern Slavery Act Transparency Policy

RISK AND COMPLIANCE

Our organisation regularly evaluates the nature and extent to which our business and our supply chains are exposed to the risk of modern slavery occurring. We do this through:

- 1 Annual management review (planned for March 2024)
- 2 New supplier form
- 3 Ensuring we use UK based manufacturers for control panels
- 4 Ensuring we use UK based installers if we contract work out

We do not consider that we operate in high risk sectors or locations because modern forms of slavery are not prevalent in the UK.

If we were to identify a risk or have concerns about a supplier, we would arrange to meet with them and discuss our concerns in person. If we were not satisfied with the outcome, we would remove them from our approved supplier list within 30 days.

We ensure our suppliers are aware of our policies and encourage them to adopt our high standards. We adopt a zero tolerance approach to slavery and human trafficking throughout the organisation which extends to our supply chains.

SUCCESS AND EFFECTIVENESS OF OUR PROCESSES

We are a new business established in 2021 and have recently discussed and confirmed our policy statement, as noted above we do not consider that we operate in high risk sectors or locations.

TRAINING

We ensure all employees are aware of the risks of modern slavery and human trafficking in our business and supply chains as part of the general induction to the business.

FURTHER ACTIONS, APPROVAL AND ENDORSEMENT

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we believe the systems we have in place are satisfactory, due to our small UK based supply chain and the work we deliver.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Novus Integration Limited's slavery and human trafficking statement for the financial year ending 31st March 2024.

Signature:

Director

Novus Integrated Ltd Andy Bridger

Date: 9/1/2024