



Modern Slavery Policy



This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 Act and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the “Act”). It sets out the steps taken by Nova Healthcare Services Ltd., to prevent modern slavery and human trafficking in its business and supply chain.

Nova HCS fully supports the Government’s objectives to eradicate modern slavery and human trafficking and recognizes the significant role we can play in combating it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labor standards abuses.

We recognise that being in the healthcare industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector, particularly nursing, aged care provision, and the manufacturing of healthcare equipment. We are committed to monitoring such risks in our business and our wider supply chain and to mitigating them.

Steps taken to date include:

→ People

We promote a workplace environment that is fair, open, and respectful and one that protects the rights and dignity of all employees. We operate people practices, employment contracts, and collective agreements that are lawful and aligned with our code and values.

- We confirm the identities of all new employees, temporary workers, and contractors and their right to work in the United Kingdom, and pay all our employees above the National Living Wage
 - Our complaints and concerns policy additionally give a platform for our employees to raise concerns about poor working practices.

→ Whistleblowing

Our whistleblowing policy sets out our commitment to ensure people are free to question things and raise anything they are concerned about, specifically modern



slavery and human trafficking. We encourage people to speak up by raising matters with our senior office team or speaking personally with the directors.

→ Procurement and our supply chain

- Our current due diligence process includes a modern slavery assessment.
- When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation.

→ Review of effectiveness

We intend to take further steps to identify, assess, and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

→ Our anti-slavery program will also

- Continue to support all staff to understand and respond to modern slavery and human trafficking and the impact that each, and every individual working in the healthcare sector can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- Ensure that staff have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services, which is to be regularly redone to ensure staff are consistently up-to-date.
- Review our safeguarding policies and training programs to ensure that Modern Slavery and human trafficking reflect potential requirements in pending reforms relating to the pre-criminal needs of people involved in human trafficking and modern slavery.
- Undertake a risk assessment on transparency in the supply chain, including an overview of products, services, and suppliers procured.



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