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).

JSSH Limited ('JSSH') is 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 JSSH 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

JSSH is the family led parent Company of Novus Property Solutions Limited ('Novus') who operate in the construction industry. JSSH also incorporates a trading division SHS Estates, a property investment company with interests in residential, commercial, retail and industrial properties predominantly within the North West.

The activities of Novus do not form part of the supply chain or business of JSSH and therefore in accordance with the Act Novus has its own Modern Slavery Policy available at www.novussolutions.co.uk.

We procure our goods within the UK, from UK based suppliers.

Our supply chain operates in numerous sectors such as building and construction, facilities management, finance, technology and utilities. We also work with other professionals, advisors, consultants, and contractors.

Policies on Modern Slavery

- All staff are paid at least the appropriate 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 maintain an approved supplier list and any identified breaches of the Modern Slavery Act 2015 will result in a supplier being removed.
- JSSH operates several internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. Many of the existing policies are relevant in ensuring that there is no slavery or human trafficking within any part of the business or supply chains.
- Our immediate supply chain is UK based.

Due diligence processes

- Concerns over the potential existence of modern slavery will be taken extremely seriously and investigated in accordance with JSSH's Raising Concerns Policy.

- JSSH maintains an approved supplier list and conducts due diligence on all new suppliers. As part of this process we require that all new suppliers, captured by the Act, confirm to us that:
    - They have taken steps to eradicate modern slavery within their business and they hold their own suppliers to account over modern slavery.
    - They pay their employees at least the appropriate National Minimum and Living Wage.
- JSSH will not support or deal with any business knowingly involved in slavery or human trafficking and will terminate the contract at any time should any instances of modern slavery come to light.

Assessing and managing risk

To measure the effectiveness of the steps that we are taking to ensure that slavery and / or human trafficking is not taking place within our business or supply chain we use the following:

- Review of supply chain by senior management.
- Use of structured payment systems and procedures.
- Regular review of our internal systems and controls.

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

To ensure a high level of understanding of the risks of modern slavery and human trafficking JSSH conducts training for all relevant members of staff.

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 JSSH Board are 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.

This policy does not give contractual rights to individual colleagues.

The Board of JSSH Limited has overall responsibility for the implementation of this Policy and are committed to ensuring this policy is communicated and understood throughout the business.

Authorised on behalf of the JSSH Board by:
Michelle Owen (Chief Executive Officer)
June 2024