

Modern Slavery and Human Trafficking Statement

Background

Modern Slavery is the illegal exploitation of people for personal or commercial gain, often in horrendous conditions which the victim cannot escape. Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

Statement

We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

Organisational Information

Novus Med is a Small, Medium Enterprise as defined by the Companies Act 2006 involved in the supply and distribution of surgical devices, medical equipment and associated products.

Our Supply Chain and Procurement

Novus Med purchase products for distribution in the UK from around the World. We generally have between 25-30 active suppliers on our approved list at any given time.

All our suppliers have to complete robust audit assessment before being included as an approved supplier. They are then audited on a yearly basis and supplier reviews are conducted by senior management at least twice yearly.

We also map our Tier 2 suppliers.

When procuring goods or services we have processes in place to consider Modern Slavery risks. We ensure we carry out supplier due diligence.

This includes:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify geographical areas of higher risk as defined by <https://www.globalslaveryindex.org>
- Requiring high risk suppliers, as part of the contract, to adhere to modern slavery policies and principles

We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices. Such as:

- Aggressive pricing that doesn't consider sustainable production costs
- Short lead times and late high volume orders

- Inaccurate forecasting
- Late or extended payments
- Withdrawing from contract at the last minute
- Enforcing unfair penalties for not meeting orders
- Making last minute changes to order specifications or volumes
- Providing inaccurate specifications

Areas of risk identified within the business and supply chain

The risk within the business itself is identified as low.

Tier 1

The risk within Tier 1 is low to medium risk. The risk rating is on a scale of 1-8 and our highest risk rating is 5. The risk level is determined using the scale according to the global slavery index.

<https://www.globalsslaveryindex.org>

This risk level will be continually reviewed and reported on.

Tier 2

We are working with our Tier 1 suppliers to identify levels of risk in Tier 2 of our supply chain.

Policies and Processes relating to Modern Slavery

Due diligence processes and policies are in place and these are available on request.

- Ethical Trading, Human Rights and Labour Standards Policy
- Supplier Audit
- Supplier Code of Conduct

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

- Number of suppliers completing our supplier self-assessment audit with the inclusion of modern slavery questions
- Completion rates for modern slavery awareness training
- The number of modern slavery cases identified and remediated

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

Training of employees around Modern Slavery

We provide third party independent training on Modern Slavery through 'Tick the Box Compliance Solutions' to all employees.

The training covers

- The ILOs Forced labour indicators

- The training ensures that recipients understand
 - Indicators of modern slavery
 - How to report suspicions of modern slavery
 - The modern slavery statement requirements
 - How to consider modern slavery risks in procurement
 - How to be better equipped to undertake modern slavery due diligence for the organisation

The training is delivered via e-learning and participants are required to pass the course using a competency-based exam.

The training is mandatory and is provided on induction and then every 12 months.

Reporting

If a case of Modern Slavery is suspected then the following is advised.

A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life then call 999

If there is not immediate risk to life then the Modern Slavery Helpline is to be called 08000 232 700 or it will be reported [online](#)

Employees are required to take their suspicions to their line manager.

If modern slavery is identified or suspected abroad, then will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

If the response from any of our suppliers, here in the UK or abroad to concerns, seems inadequate and adequate measures are not put in place to address coercion, threat, abuse and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions could then be included in the next statement produced.

Review and Communication

This statement is reviewed yearly by senior management and signed by the director. It is published on our company website <https://novus-med.com> , and also uploaded to the following registers:

- <https://www.modernslaveryregistry.org>

Internally it will be sent to all employees and also sent to our supply chain and other interested stakeholders.



Signed: Tim Martin - Managing Director

Date: 25/07/2023