

Modern Slavery Statement

Financial Year Ended 31 December 2025

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Novus Property Solutions Limited (“Novus”) has taken during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking in its business and supply chains.

Structure, Business and Supply Chains

Novus operates in the construction industry, providing construction and maintenance services to UK-based customers. Novus is a wholly owned subsidiary of JSSH Limited. The supply chain includes a significant proportion of subcontractors, with materials procured primarily from UK-based suppliers, with limited European sourcing.

Policies in Relation to Modern Slavery

Novus is committed to acting ethically and with integrity in all business dealings. The Group has a suite of policies which support the prevention of modern slavery, including:

- Modern Slavery Policy
- Business Ethics Policy
- Recruitment Policy
- Raising Concerns Policy
- Safeguarding Policies

Novus incorporates modern slavery compliance provisions within its subcontract and supplier terms and conditions. These provisions require suppliers to comply with the Modern Slavery Act 2015. Breach of these provisions is treated as a material breach of contract, enabling Novus to take appropriate action, including termination of the relationship where necessary.

Due Diligence Processes

During the year, Novus has maintained processes to identify and manage risks of modern slavery, including:

- Supplier approval processes requiring confirmation of compliance with modern slavery obligations and minimum wage requirements
- Maintenance of an approved supplier list, with removal where breaches are identified
- Routine documented site inspections by senior managers and Safety, Health, Environment & Assurance team site inspections.
- Adverse media monitoring of key suppliers.

- Mandating Constructionline accreditation for the majority of our existing and new supply chain.

New suppliers introduced during the year were subject to these onboarding requirements prior to engagement.

Risk Assessment and Management

The majority of Novus' supply chain operates within the UK, reducing exposure to certain risk factors. However, there remains inherent risk within second-tier supply chains where there is less direct oversight, which is mitigated through contractual obligations, supplier selection processes, and ongoing monitoring activities.

Effectiveness (Performance Indicators)

Novus monitors a number of indicators to assess the effectiveness of its approach, including:

- Training completion rates for Business Ethics training
- Supply chain payment performance, which is published six-monthly on the Government payment practices reporting service
- Supplier selection based on best value, rather than lowest cost alone

No instances of modern slavery were identified during the year.

Training

Staff with procurement responsibilities receive training in Business Ethics, which includes modern slavery awareness. The Modern Slavery Policy is accessible to all employees and subcontractors.

Whistleblowing

Novus operates a whistleblowing process enabling employees and supply chain workers to raise concerns confidentially via a dedicated hotline and email address.

Approval

This statement was approved by the Novus Board of Directors on 30 June 2026 and is signed on its behalf by:



David Leach, Executive Director