Modern Slavery Policy

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Novus Altair has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Novus Altair has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. All or some are available upon request.

Our suppliers

Novus Altair operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.
In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our management and staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Recommendations for Agency Workers and Fair Wage Policy

1. **Implement Regular Reviews:**
    - Regularly review agency contracts and worker pay to ensure compliance with wage laws and fair treatment. Schedule periodic audits to identify and address any discrepancies.
2. **Engage with Agencies:**
    - Work closely with recruitment agencies to ensure they understand and adhere to our fair wage policies. Foster open communication to address any issues promptly.
3. **Promote Transparency:**

- Maintain clear documentation and communication regarding wage policies and benefits. Ensure that all workers, including agency workers, have access to information about their pay and entitlements.

4. **Feedback Mechanisms:**
    - Establish feedback mechanisms for agency workers to report concerns or issues related to pay or working conditions. Act on feedback to improve practices and address any concerns.

Our performance indicators

We will know 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 if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

By fulfilling these procedures, **Novus Altair Limited** determines a pre-emptive binder to take-up modern slavery and certifying fair pay, thus adhering to our commitments under the Modern Slavery Act (2015) and The National Minimum Wage Act (1998).

Approval for this statement

Name: Dr Adnan Niazi (Director)
Date: 01/05/2019
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