



## **Novah Ethical Trading Policy and Modern Slavery Act**

Novah Limited is committed to acting responsibly in all our business practices through making sound decisions which take social, economic and environmental factors into account. We want to be part of a socially and environmentally responsible supply chain, sourcing and delivering worldwide and choosing business partners who share our company values and targets.

At Novah our values underpin everything we do. People matter, the well being of our employees is crucially important to us and we continue to build long term business partnerships and long lasting relationships with our supply chain based on fundamental principles of our Ethical Trading Policy.

The Novah Ethical Trading Policy outlines the commitments we make and the processes we require from all our product suppliers to demonstrate compliance and good practices through the supply chain. Our suppliers are required to submit an annual independent audit to confirm manufacturing standards, compliance and good working practises are aligned to our Ethical Trading Policy. Our Technical and Buying teams regularly visit the factories and require updates on worker engagement programmes, sustainability and reviews of any corrective action plans. Informed by the best available information, we choose to work with suppliers who demonstrate ethical practices above what would be considered the minimum.

The Novah Ethical Trading Policy is based on the UK Ethical Trading Initiative (ETI) base code and our policies are based on International Labour Organisation (ILO) standards. This includes the key principles:-

- Freedom of Employment
- The right to collective bargaining and freedom of association are respected
- Safe and hygienic working conditions
- Child labour is not acceptable
- All workers shall be paid a living wage
- Working hours are not excessive
- Discrimination shall not be practised
- Regular Employment is provided
- No harsh or inhumane treatment is allowed

Novah has a zero tolerance approach to modern slavery and human trafficking, which is reflected in our policies and controls on Ethical Trading throughout our product supply chain. We plan to enhance and strengthen our current policies and practices in light of the Modern Slavery Act and will provide an update on our progress in next year's statement.