

## ESG strategy

Our vision is to be recognised as a responsible industry leader in everything that we do, achieving our vision through:

1. Working with likeminded investors, partners and clients who share our core values and objectives.
2. Ensuring our own business and products are resilient to climate change and in-line with our pathway to Net Zero.
3. Empowering our experienced design team and delivery supply chain to act responsibly and ethically to create long-term value of our products.
4. Identifying research opportunities and developing innovative solutions.
5. Implementing a feedback loop of regular ESG monitoring and reporting to enable continual improvement.

## Core objectives

### Environmental

- Minimise the impact of our own activities and supply chain, with a focus on carbon emissions reduction towards Net Zero
- Encourage our clients developments and assets on the path to Net Zero in construction and operation
- Work with clients that produce developments that complement and enhance the environment throughout their entire life

### Social

- Support the physical and mental health and wellbeing of our staff and supply chain
- Encourage continual professional learning and development across all aspects of the business
- Produce buildings that enhance the health and wellbeing of their occupants and the communities in which they are located to leave a positive legacy throughout their whole life

### Governance

- To continue to run the business in a participatory, consensus-oriented, accountable, transparent, responsive, efficient, equitable and inclusive way
- To communicate our policies and strategy to our internal stakeholders and supply chain
- To make appropriate levels of monitoring and disclosure to display our robust approach

## Corporate approach

Our key focus areas are as follows:

### Environmental

- Energy/Carbon Use
- Water Use
- Waste

### Social

- Health & Safety
- Wellbeing
- Education & Training
- Up-Skilling
- Advancement

### Governance

- Leadership
- Policies
- Reporting
- Risk Management
- Shareholder Rights

## ENVIRONMENTAL POLICY

### Responsibility

In addition to compliance with all relevant legislation, regulations, and best practice, NSL embraces the changing role of businesses within society and accept our role of responsibility in helping to create a more sustainable environment.

From working with our supply chain to encourage upstream responsibility to procuring sustainable material as and where possible, plus identifying and effectively managing our potential significant environmental impacts, we pride ourselves on our proactive environmentally responsible approach to business.

### Stakeholders

All stakeholders are actively involved in our environmental policy. We can only succeed in our vision of achieving net-zero through a collaborative and universal approach.

## ENVIRONMENTAL SOCIAL & GOVERNANCE STRATEGY

Communicating our environmental aims and objectives to all stakeholder groups is a fundamental pre-requisite for success. As such we undertake regular employee engagement exercises to all internal stakeholders explaining our sustainable direction in ensuring a shared sustainability vision throughout the company.

### **Waste**

As a potentially significant environmental impact, we prioritise effective waste management. Throughout NSL the mentality of reduce, reuse, and recycle is strictly reinforced in accordance with the waste hierarchy.

We work closely with key suppliers to encourage the development of their own environmental best practice as well as working with our local waste management provider to ensure all waste that can be recycled is recycled.

We also undertake monthly waste audits helping us to ensure that we are managing our waste to the highest standard and allowing us to identify where we can make changes to further maximise efficiency and minimise waste generation.

### **Progression**

Our world is ever-changing, therefore our policy to protect it should also be dynamic and progressive to remain meaningful and relevant.

Through regular audits and conduct reviews, we commit to achieving continual improvements within our environmental performance, identifying, and acting on opportunities to make further positive changes. This includes undertaking an independent Whole Life Cycle Carbon Assessment of our building system.

### **Quality Policy**

Our ethos at NSL is to build better homes in a better way. Everyone in our business will contribute through; a customer focus, commitment and participation, a process-based approach and continuous improvement. Quality shall be achieved by working to continuously improve our processes. Everyone shall understand how they contribute to customer satisfaction and quality improvement.

Results will be monitored against set objectives and improved upon to ensure continued customer satisfaction. Processes shall be continuously evaluated, and actions taken to ensure they are effective and efficient. Transfer of knowledge and best practice shall be actively pursued across the business to encourage a culture where we learn from each other. A preventative and proactive approach shall always be applied.

### **Customer Focus**

Quality is a measure of our performance as experienced by our customers. Success in the market depends on our ability to always provide our customers with products and services that meet both their expectations and the requirements of interested parties.

To succeed, we must perform better than our competitors. This requires that we continuously listen to our customers in order to understand their needs, and promptly implement sustainable and operational improvements to meet them.



**Commitment and participation**

All NSL employees will always be customer focused and committed to quality excellence. This is a personal responsibility, a mind-set, which is required to achieve customer satisfaction. Every employee is expected to actively contribute to the achievement of quality. To continuously manage this, we all need to be open to change, have a holistic view of our operations, and apply a long-term perspective.

Our quality policy is attached in the Appendices section.



Our Certificate of Approval is attached in the appendices section.



Our BOPAS Certificate of Approval is attached in the appendices section.



Our SCI|Stage 1 NHBC Certification is attached in the appendices section.

**ETHICAL POLICY**

**Integrity and Responsibility**

Integrity and responsibility are embedded in all our actions and decision making here at NSL. From supply chain and internal operations to end-use design, by upholding the highest levels of integrity and responsibility we can work to ensure we create the biggest benefit for our shareholders, both within our business and throughout the wider community we serve.

**Tolerance and Inclusion**

In addition to compliance with national legislation, we work hard to create a working environment where all employees feel safe, welcomed, valued, and respected at all times. Failure to comply with our internal culture of tolerance and inclusion will be dealt with effectively and efficiently so as to maintain a workplace free from discrimination, bullying, and harassment.

**Fairness and Justice**

Competence and impartiality are central within our business practices as standard. We pride ourselves on our ability to deal with any grievances and disputes which arise with fairness and justice by following established policies and procedures. In addition, NSL

## **ENVIRONMENTAL SOCIAL & GOVERNANCE STRATEGY**

supports a 'culture of no limits' meaning that every employee has equal employment opportunities and progression support irrespective of social markers.

### **Health and Wellbeing**

At NSL we prioritise the safeguarding of the health, safety, and wellbeing of all employees and visitors. Through abiding by relevant legislation, providing adequate facilities, and encouraging staff to voice concerns over suspected dangers, we work to ensure the creation of a safe and pleasant working environment.

The health and wellbeing of the individuals within the local communities we serve are also of paramount importance to us. By manufacturing offsite, we're able to minimise disruption to local communities and significantly reduce both air and noise pollution.

### **MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

#### **Modern slavery and human trafficking**

At NSL we aim to have transparent business operations and performance. We follow a high set of ethics and values, and these guide our governance procedures and management decisions. We are committed to expanding our operations globally in a sustainable manner for the benefit of our customers, employees, and the wider community. We take our corporate responsibility very seriously and this forms the foundation of our strategy and business decisions.

#### **NSL Main Business**

NSL is a company that delivers precision-engineered homes. We work collaboratively with our partners to create homes to meet local requirements. More details of our business are available on our website. [www.nova-structures.co.uk](http://www.nova-structures.co.uk)

Our supply chain: We have a small, specialist, approved supply chain, and relationships are strengthened through regular and ongoing supplier approval visits, so that any who are operating or sourcing from high-risk countries, where modern forms of slavery are prevalent, can be quickly identified and audited.

#### **Our Policies in relation to Slavery and Human Trafficking**

NSL has a recruitment process in place which involves ensuring that pay and working conditions are appropriately managed and has policies and procedures to ensure that all business is conducted in a transparent, ethical, and responsible manner, thus remaining compliant with the Modern Slavery Act 2015.

NSL's Modern Slavery and Human Trafficking Policy sets out its zero-tolerance stance and explains its procedures to ensure modern slavery and human trafficking is not taking place in its business and supply chain, including how suspected breaches can be reported.

#### **Terms and Conditions of Purchase**

NSL terms and conditions of purchase imposes a requirement to comply with our Modern Slavery and Human Trafficking Policy.



## ENVIRONMENTAL SOCIAL & GOVERNANCE STRATEGY

Other existing policies such as the ones below are designed to ensure compliance to high ethical standards of behaviour throughout the organisation, fair treatment of all colleagues, and an open culture where any concerns can be raised with Management:

- Anti- Bribery and Corruption Policy;
- Whistleblowing Policy; and
- Grievance Policy.

As part of the Whistleblowing Policy, NSL will be introducing a confidential online reporting system to ensure an easy means of reporting any policy violations.

### Our Due Diligence Processes

Following the publication of the Modern Slavery Act, NSL has introduced further due diligence on the supply chain as part of the approval process leading to preferred supplier status. We continue to consider where our business and supply chain is most at risk.

We request that key suppliers provide their policies on anti-slavery and human trafficking, as well as any other policies that show they operate with clear ethical responsibility towards their workforce, and comply with legislative requirements, for example on pay, equal treatment and working conditions.

NSL does not support or knowingly deal with any business involved in slavery or human trafficking. We will not work with any company in breach of our Modern Slavery and Human Trafficking policy or identified as having slavery and human trafficking in its business or supply chains.

### Looking Ahead

NSL will implement mandatory training on the requirements of the Modern Slavery Act, and we will provide further training as required for any other managers involved in the supply chain function to ensure they can evaluate the risks and recognise signs of modern slavery and human trafficking.

### GENDER POLICY

NSL was created with the purpose of addressing the UK's continuing housing shortage and making homes possible for everyone. As an innovator in the house building sector, our values form the foundation of our business, ensuring we are a Pioneering, Responsible, Proud Community of people.

Diversity is absolutely critical to the innovative nature of our organisation. We believe everyone should have an equal opportunity to be their best, share their talent and develop a rewarding career.

Our business reaches across both manufacturing and construction, both historically male-dominated, and we have a lot of work to do in breaking down the preconceptions of our working environment and will keep pushing an attraction strategy that will engage a wider, more diverse pool of talent.

We are fully committed to supporting gender equality in the workforce; with this in mind we operate a number of flexible working and family friendly policies, career development opportunities accessible for all and a transparent and visible pay and reward policy and structure.

**CORONAVIRUS**

Working safely during the Coronavirus-19 Pandemic

- NSL Covid-19 Risk Assessment is attached in the appendices section
- NSL Covid-19 Work Policy is attached in the appendices section

Signed:  .....

Terry Wood  
Chief Executive  
For and on behalf of Nova Structures Ltd