

## Anti – Slavery & Human Trafficking Policy Statement

### Introduction

This statement sets out Avrenim actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chain. This statement relates to actions and activities during Avrenim financial year, from March 2023 to 31 March 2024 and will be updated annually. Avrenim recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and supply chains.

### Organisational structure and supply chains

This statement covers the activities of Avrenim, we are a facilities Management & Energy Services company operating with consultants, agencies, clients, private companies, public companies and third parties. The organisation currently operates in the following countries.

- United Kingdom

### Responsibility

*Responsibilities for the organisation's anti-slavery initiatives is as follows.*

#### Policies

All Avrenim policies are available in the employee handbook. They are developed through UK legislation and best practice recognised by relevant UK Authorities. Avrenim proactively reviews all company policies on an annual basis, ensuring compliance with UK. Avrenim ensures any risk assessments are completed in line with UK legislation, including but not limited to health and safety in the workplace.

#### Investigations/due diligence

Avrenim operates a structured disciplinary, grievance, complaints, and whistleblowing policy. We actively encourage all employees to report and instances of harassment, discrimination, or breach in human rights, including slavery and human trafficking.

### Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

#### Whistleblowing

Avrenim encourages all its workers, customers, and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Avrenim' whistleblowing procedure is designed to make it easy for workers to make

disclosures, without fear of retaliation. Employees, customers, or others who have concerns can review this policy in the Employee handbook.

### Code of Conduct/General Rules

The Avrenim employee handbook makes clear to the employees the actions and behaviour expected of them when representing the organisation. Avrenim strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. Avrenim is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Avrenim works with suppliers to ensure that they meet the standards of the code and improve their workers working conditions. However, serious violations of the organisations supplier code of conduct will lead to the termination of the business relationship.

### **Due Diligence**

Avrenim undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Avrenim' due diligence and reviews may include.

- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- Creating an annual risk profile for each supplier
- Participating in collaborative initiatives focused on human rights in general and slavery and human trafficking.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or serious violation our supplier code of conduct, including the termination of the business relationship.

### **Performance Indicators**

Avrenim has reviewed its key performance indicators (KPIs).

As a result, Avrenim is:

- Developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain
- Reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.
- Planning management training in the correct process management of internal policies, including identifying risks of slavery and human trafficking

### **Training**

Avrenim requires all staff to complete a training session during induction. The organisations training session covers.

- How to identify the signs of slavery and human trafficking
- How to escalate potential slavery or human trafficking in relation to various aspects of the business, including resources and support available.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available?

- The basic principles of the Modern Slavery Act 2015
- For the purpose of clarity, we have provided this training detail in our policy.

### **The Basic Principles of the Modern Slavery Act 2015.**

The Modern Slavery Act will give law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims. It received Royal Assent on Thursday 26 March 2015.

#### The act will:

- Consolidate and simplify existing offences into a single act
- Ensure that perpetrators receive suitably severe punishments for modern slavery crimes (including life sentences)
- Enhance the court's ability to put restrictions on individuals where it's necessary to protect people from the harm caused by modern slavery offences
- Create an independent anti-slavery commissioner to improve and better coordinate the response to modern slavery
- Introduce a defence for victims of slavery and trafficking
- Place a duty on the secretary of state to produce statutory guidance on victim identification and victim services
- Enable the secretary of state to make regulations relating to the identification of and support for victims
- Make provision for independent child trafficking advocates
- Introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- Enable law enforcement to stop boats where slaves are suspected of being held or trafficked
- Require businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains

### **How to identify the signs of slavery and human trafficking**

Individuals being trafficked or enslaved may believe that they must work against their will, receive little or no payment and be unable to leave their work environment. Victims may show fear or anxiety and carry injuries that appear to be the result of an assault. They may not know their home or work address. They may not be in possession of their passport or other documents, or they might always be accompanied by somebody else and not allowed to speak for themselves.

Children who have been trafficked may have no access to their parents or guardians, look intimidated and behave in a way that does not correspond with behaviour typical of a child their age. They will typically be engaged in work that is not suitable for children and travel unaccompanied by adults.

People who have been trafficked or enslaved for labour exploitation may live in groups in the same place where they work. They may leave those premises infrequently, if at all. They might not be dressed adequately for the work they do, have no labour contract, work excessively long hours, or lack basic training and professional licenses. They might be subject to insults, abuse, threats, or violence.

## How to escalate potential slavery or human trafficking in relation to various aspects of the business, including resources and support available.

In the event a person suspects slavery or human trafficking, they should report the incident to a line manager. If an employee feels this is not appropriate, they should report their suspicion to a director. Further details on reporting are included in the whistleblowing policy. Suppliers should report their concerns directly to the Director.

## What initial steps should be taken if slavery or human trafficking is suspected?

Once a person has made their report, the concerns will be referred centrally to the Director who will assess the case and an Investigating Officer will be assigned to investigate the matter to establish the facts. The investigation will be completed within a reasonable period, bearing in mind the circumstances and frequency of the alleged breach. The Investigating Officer may try to contact the reporter to obtain further information about the case although they will still have the opportunity to preserve their anonymity subject to external processes (such as criminal proceedings) where the release of information may be outside Avrenim control.

We will give as much feedback as we can without any infringement on a duty of confidence owed by us to someone else.

We will not disclose the reporter identity without their consent. If the situation arises where we are not able to resolve the concern without revealing the identity (e.g., if the evidence is required in court), we will discuss with the reporter whether and how we can proceed.

## What external help is available?

If you suspect that, someone has been trafficked or enslaved:

- call 999 in case of an emergency
- call 101 about the general situation
- call 0800 0121 700 for the Modern Slavery Helpline

*Signed by*



*Simon Harris*

*Date: 20<sup>th</sup> June 2024*