

Modern Slavery Statement

Introduction

This Modern Slavery Statement is made under Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Avetta Limited during the financial year 2019/20 to prevent modern slavery and human trafficking in our business and associated supply chain.

As a global business, we recognise the issue of modern slavery and human trafficking as a global problem and that it can impact upon Avetta, our workers and clients alike. The Avetta executive and stakeholders demand that we uphold the highest levels of ethical business practice and transparency, we are committed to work with our internal stakeholders to ensure that there is no modern slavery within our own business and support our clients' who participate in our supply chain risk mitigation programmes, irrelevant of their geographic location. The senior management team and all shareholders take responsibility for developing and implementing the contents of this policy statement. They will ensure adequate resources are allocated to ensure that slavery or human trafficking is not taking place within our company supply chain. This statement confirms the actions taken by Avetta to understand where the risk of modern slavery may be found in our day to day business implementing controls to ensure there is no slavery or human trafficking present.

Our structure, business and supply chains

As a business with a global footprint we support companies that operate in all regions of the world in both developed and emerging economies. Avetta provides its supply chain risk services to our clients to evaluate and analyse their supply chains in over 120 countries. We operate from a series of strategically located offices in the main regions of the world with over 400 employees, working in partnership with client organisations providing them with value-add procurement, sustainability and health and safety risk-based data on their suppliers and detailed analysis of these outputs focusing on ethical business practice, using cloud-based technology. We provide employee welfare and wellbeing programmes to evaluate the safety and wellbeing of individual workers who work for Avetta.

Our client driven services are subject to continual monitoring and assessment so that clients can deliver objective evidential procurement decisions within a transparent environment. We have a detailed organisational structure that manages each region. The business activity and any associated risk is managed regionally utilising in-house expertise to evaluate and mitigate this risk.

Our services

Our clients utilise our services to understand and evaluate their supply chain. As part of this service we assess their suppliers' level of compliance to the legislation regarding good business practice in their country of operation, collecting and analysing real time data throughout all levels of their supply chain, also their capacity and capability as an organisation. This includes, implementing programmes to prevent slavery and human trafficking within the extended supply chain. We serve more than 400 clients ranging from small, specialist businesses to large, multinational companies with tens of thousands of employees. As a business we recognise we have a responsibility to give something back and generate a positive impact within the business sectors we operate within. To assist our client's in the evaluation of suppliers we use the services of qualified auditors who can be employed or engaged via a third party. Audits undertaken of suppliers who may import a high degree of risk into the client organisation are subject to detailed analysis of their management programmes including safety of the workforce, reduction of environmental impacts, ethical sourcing and assurance that no forced labour or slavery is present within that business, this also includes details analysis of a suppliers capability where there may be a reliance on subcontracting which can increase the probability of issues being identified.

Avetta enters into a partnership with client's that utilise our services, because we share the same values and understand the importance of always conducting business in an ethical and transparent manner. All Avetta

personnel involved in supplier evaluation have received training to recognise the signs and potential traits that constitute modern slavery and human trafficking.

Avetta have developed a three-stage sustainability audit programme that incorporates analysis of different labour practice not restricted to slavery and trafficking but also includes the serious issue of child labour, workplace safety and prevention of corruption within the supply chain. This programme, due to the different stages it employs can be applied to a wide range of client's and considers supplier demographics and their place within the supply chain.

Third Party Services

To assist us in delivering our audit programme we can use the services of third-party auditors who are not employed directly by Avetta. These individuals are mandated to sign and agree our standard code of practice which confirms they will always adhere to ethical and transparent business conduct. They will also be issued with copies of our codes of conduct and receive training in their content and our business practice before commencing work on our behalf.

Initiatives

- The company prides itself on its business ethos of providing a transparent and ethical business platform. In 2019 the business became a signatory of the United Nations Global Compact; integrating the ten business principles into our corporate culture and our product offering, further strengthening our commitment to the provision of an ethical and fair work environment not only for all our global operations but those of the third parties utilised by our client's.
- We are a member of the United Kingdom (UK) Gang Master Licensing Authority construction protocol which has been created to actively prevent modern slavery within the UK construction supply chain.
- As a business we have a very limited range in terms of what we procure as a business. We can confirm our greatest spend is focused predominantly on travel related items such as flights and hotel accommodation. We have developed a Supplier Code of Conduct that covers our expectations specific to any organisation that we enter into a contractual relationship (new and existing suppliers) with confirming that we will only deal with suppliers who can clearly demonstrate a commitment to human rights and good labour practices, health and safety and a reduction in their environmental impacts. We will not procure any form of service that includes enslaved or forced labour. They will be expected to participate within ethical and transparent business practice. As a company we buy a variety of goods and services to support our business from specialist services and office consumables to flights and clothing. In addition to this many of our suppliers have their own supply chain and as such some elements of our supply chain can be relatively complex.
- We have used the Ethical Trade Initiative to assist in the development of our in-house Ethical and Sustainability Policy which has been implemented throughout our global operation.

Recruitment Practice

We have introduced a range of company policies and recruitment practices that are endorsed at the highest level within the company. This ensures from the time an individual commences their working life with Avetta, they fully understand the business fully respects equal opportunity, diversity, freedom of opportunity and the removal of discrimination within the working environment. We operate robust recruitment practice, including conducting eligibility to work checks in line with United Kingdom government requirements. This covers all employees to prevent human trafficking or individuals being forced to work against their will. At times we use the services of external recruitment agencies who are also required to confirm that they will comply with the legislation in place within the country of operation and our codes of practice.

We do not charge a fee to join Avetta and we do not expect any external agencies to do so. We recognise that slavery and human trafficking has a major impact upon an individual's freedom and anything that deviates from this goes against our core values. All individuals who work for Avetta have chosen to do so of their own free will.

All of our new starters attend a central induction programme, including training in all our codes of practice and policy statements and are provided with a diverse range of e-training programmes that tests their understanding of our corporate commitment to provide all employees with suitable levels of support, education and training.

Training and Communication

We are committed to conduct all business transactions in an ethical and transparent manner. We recognise that in some areas of the world, there can be cultural differences where unethical business practice can occur or be deemed acceptable. We will not deviate from our business ethos and to reiterate this, all members of our global workforce are provided with training and guidance on the content of all our business policies and how we should conduct ourselves in all our business relationships.

We have implemented company procedures that reinforce how issues such as modern slavery and human trafficking should be addressed. All personnel are advised they have open access to any member of the executive team to report concerns they may have regarding our business conduct. All personnel who are in a position where they can procure products or services on our behalf are expected to read and sign to confirm their understanding of our supplier code of conduct so that they do not willingly procure goods or services that may be impacted by modern slavery or human trafficking.

Our annual training programme requires that all members of staff must acknowledge a wide range of business specific training material that also requires they are evaluated based upon their understanding and ultimately, they sign to confirm their participation and adherence to the content. All members of the global workforce were provided detailed guidance on how the business applies the United Nations Global Compact principles in our day to day business. All members of the workforce within our United Kingdom operation have also been provided with detailed interactive training on how to identify the issues that are specific to modern slavery and human trafficking.

Remuneration for work

All personnel employed by Avetta Limited in the United Kingdom are paid in excess of the living wage. Where we utilise the services of third parties such as an external auditor they too are also paid in excess of the living wage.

Confirmation of intent

The senior management team within Avetta are committed to ensuring that there is no modern slavery or human trafficking within our global business or our supply chain. We extend this commitment to our client's by applying our range of supply chain evaluation as applied to their supply chain. We wish to demonstrate this by applying the stages of our Modern Slavery Statement and continually striving to improve our product offering to increase our due diligence and governance both inhouse and to our client's. We are focused upon improving our sustainability credentials, we have appointed key personnel to drive our global strategy throughout our business and entrench this into our daily business activity.

This policy statement was approved by the executive team and the board on December 5th, 2019 and signed by Arshad Matin, Chief Executive Officer.

