



# Anti-Slavery & Human Trafficking

## 1. Introduction

1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Avant Electronics Limited slavery and human trafficking statement.

1.2 Avant Electronics Limited is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the Company is taking (and intends to take) to avoid the risk of modern slavery occurring within our services.

## 2. Due Diligence processes

2.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of Company services, Avant Electronics Limited will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

2.2 Avant Electronics Limited has in place systems to:

- Identify and assess the potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

2.3 Avant Electronics Limited identifies the following as the principal areas of potential risk:

- Supply Chains for goods and services - particularly IT equipment and uniforms; outsourced cleaning and security services.
- Recruitment agencies for temporary staff

## 3. Supply chains

3.1 In its supply chains, Avant Electronics Limited has identified the following business areas as carrying material risks of modern slavery occurring:

Avant Electronics Limited

- IT equipment provision
- Product Manufacturing
- Clothing and uniforms
- Outsourced cleaning
- Outsourced security services



- 3.2 When tendering any types of goods or services, Avant Electronics Limited requires any potential third-party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015 during any tendering and selection process, including through contracting with suppliers from approved procurement frameworks.
- 3.3 When procuring any types of goods or services identified as carrying material risks of modern slavery occurring (4.1) the Company requires any supplier to evidence that that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.
- 4.3 Any supplier or potential supplier, identified in 4.2 or 4.3, wishing to supply to or partner with Avant Electronics Limited that does not comply with the Modern Slavery Act 2015, or Avant Electronics Limited own policies and procedures, will be removed from the list of approved suppliers and will not be considered for future supply to the Company unless they can demonstrate that these compliance requirements are met.
- 4.4 In terms of future steps, Avant Electronics Limited will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

#### 4. Training

- 4.1 To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff responsible for recruitment, procurement and contract management. We also require our business partners to provide training to their staff and suppliers and providers.

#### 5. Recruitment practices

- 5.1 Temporary staff and staff recruited indirectly by Avant Electronics Limited are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, Avant Electronics Limited conducts checks on such agencies before they are approved.
- 5.2 Through its recruitment processes, Avant Electronics Limited ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

#### 6. Company policies

- 6.1 Avant Electronics Limited already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of Company business. Avant Electronics Limited operates the following policies:



**Grievance and Whistleblowing policies** - these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

**Employee Code of Conduct / Handbook** - this code sets out the actions and behaviour expected of them whilst employed by Avant Electronics Limited. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

**Anti-bribery and corruption policy** – Avant Electronics Limited is committed to the highest standards of ethical conduct and integrity in its business activities. Avant Electronics Limited will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.

**Procurement / purchasing process** - this process reflects Avant Electronics Limited commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.

**Recruitment process** - this process ensures that Avant Electronics Limited follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## 7. Performance indicators

- 7.1 Where Avant Electronics Limited has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The Company will consider setting and reviewing KPIs in the following contexts:
- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery.
  - assessment of third-party suppliers of relevant goods and services and their supply chains.
- 7.2 This statement will be made available to all staff members, stakeholders and the general public. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.
- 7.3 Having assessed the training needs for all staff operating in the company, Avant Electronics Limited will look at devising and implementing training and awareness- raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

## Document Review Plans

This document is subject to a scheduled annual review. Updates shall be made in accordance with business requirements and changes.