

**AVK-COM-PL-019**  
**Modern Slavery &**  
**Human Trafficking**  
**Policy**



Document Revision History				
Version	Date	Description of Change	Author/Editor	Approved By
1.4	07/01/2025	Annual Review	Head of CSR	CRO
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# Modern Slavery & Human Trafficking Policy

## 1. Purpose

This policy sets out AVK's 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 chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and it may be amended at any time. This policy is supported by an annual Modern Slavery Statement published in accordance with Section 54 of the Modern Slavery Act 2015, which reports on actions taken during each financial year.

## 2. Scope

The policy commits the organisation to identifying, preventing, and addressing risks of modern slavery and human trafficking within its operations and supply chains, fostering a culture of transparency, accountability, and human rights protection.

## 3. Policy Statement

The policy outlines the steps AVK will take to comply with the Modern Slavery Act 2015. Our commitment to acting ethically and with integrity in our organisational relationships across the UK and internationally.

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## 4. Procedure

### 4.1. Due Diligence Process

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures which are designed to:

- Establish, assess and monitor areas of potential risk in our business and supply chains.
- Annual risk review of our suppliers
- Reduce the potential risk of slavery and human trafficking occurring in our business and supply chains.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our Supplier code of conduct and provide adequate protection for whistle-blowers.

AVK ensures all suppliers complete Supplier & Subcontractor Evaluation form, and they will be made aware of this Modern Slavery Policy and the associated Modern Slavery Statement, and it shall become an integral part of their contract. They are bound by the provisions contained in it and shall abide by it.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training / briefing will be provided as necessary.

Our zero-tolerance approach to modern slavery are communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. AVK is a member of Sedex (Supplier Ethical Data Exchange), a global platform enabling businesses to collect and act on supply chain working conditions data covering labour rights, health and safety, environment and business ethics. Sedex forms part of AVK's ongoing supply chain risk monitoring framework and suppliers will be progressively onboarded onto the platform.

## 5. Review and Revision

This policy will be reviewed annually and updated as necessary to reflect changes in legislation, supply chain risk, or operational practice. The annual review will consider the findings of the most recent supplier risk assessment and any incidents or concerns raised through whistleblowing channels during the reporting period. The associated Modern Slavery Statement will be published within six months of each financial year-end.

## 6. Responsibilities

### 6.1. C-Suite

- Provides leadership and strategic direction for ethical business practices.
- Ensures company-wide commitment to eradicating modern slavery.
- Approves and signs the Modern Slavery Statement.
- Allocates resources for compliance, due diligence, and training programs.

### 6.2. VP's & Directors

- Ensure compliance with modern slavery laws and ethical sourcing policies.
- Hold departments accountable for implementing risk assessments and due diligence.
- Report on progress and challenges to the board.

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- Promotes a culture of transparency and ethical responsibility.

## 6.3. Sustainability & Responsible Business (SRB)

- Develops and updates the Modern Slavery & Human Trafficking Policy.
- Ensures ethical sourcing and responsible procurement practices.
- Engages with stakeholders, NGOs, and regulators on human rights and sustainability.
- Publishes the Modern Slavery Statement and reports on progress.
- Review suppliers at onboarding in accordance with best practice modern slavery requirements.
- Provides training/ capacity building on policy.
- Manage AVK's Sedex membership and coordinate supplier onboarding onto the platform.

## 6.4. People Team

- Ensure fair hiring practices and no exploitation of workers.
- Provide modern slavery awareness training to all employees.

## 6.5. Supply Chain & Procurement

- Ensure all suppliers and contractors comply with anti-slavery policies.
- Include modern slavery clauses in contracts with vendors.
- Conduct regular supplier audits and assessments.
- Work with suppliers to improve labour conditions and eliminate risks.

## 6.6. Heads of Departments and Senior Managers

- Ensure departmental activities align with modern slavery policies.
- Encourage employees and contractors to report concerns.
- Cooperate with compliance teams during audits and risk assessments.
- Monitor work conditions for any signs of forced labour or exploitation.
- Ensure teams complete required training on modern slavery awareness.
- Escalate any identified risks or incidents to the People Team promptly.

## 6.7. Line Managers and Supervisors

- Ensure teams are aware of the company's Modern Slavery Policy.
- Ensure teams follow ethical labour practices.
- Monitor workplace conditions and report any concerns.
- Support compliance audits and supply chain reviews.
- Provide guidance on escalating modern slavery-related issues.

## 6.8. All Employees & Contractors

- Be vigilant and report any concerns about forced labour or exploitation.
- Understand workers' rights and modern slavery risks.
- Refuse to engage in or tolerate any unethical labour practices.
- Use whistleblowing channels to report violations safely.

## 6.9. External Stakeholders (Clients, Suppliers, Partners)

- Ensure supply chain transparency and compliance with ethical standards.
- Report any concerns about modern slavery within the company or suppliers.

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- Work together to improve labour rights and eliminate forced labour.
- Support investigations by providing relevant information when modern slavery concerns are raised.

## 7. Compliance

Failure to comply with any provision of this policy may result in disciplinary action and may also be reported to the appropriate authorities.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the People Team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Ben Pritchard  
CEO (Signed May 2026)  
On behalf of the AVK Senior Leadership Team

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