

## **AVK-SEG (UK) LTD QEMS0600 MODERN SLAVERY STATEMENT 2021/2022**

**This statement sets out AVK-SEG (UK) LTD'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. This statement relates to actions and activities during the financial year [31 March 2021 to 31 March 2022].**

### **AVK'S COMMITMENT TO TACKLING MODERN SLAVERY**

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.

### **AVK'S ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN**

AVK are the UK's leading provider of critical power systems and maintenance. Specializing in all aspects of the design, planning, implementation and on-going maintenance of critical power systems.

For over 30 years we've been providing Generator & UPS solutions for mission critical services & systems. Since our founding in 1989, AVK have had continued steady and consistent growth, not only in size, but also our reputation.

We are trusted by many of the UK's largest Blue-Chip companies to design, install and maintain 100% power integrity to guarantee their operations when mains power fails.

AVK is committed to ensuring that our suppliers and subcontractors adhere to the highest standards of ethics. We hold an annual supplier day where we hold workshops and inform them of our company policies. They are given copies of all our policies and acknowledge understanding of the contents and the agreement to implement the necessary procedures. Any serious or deliberate failure by a supplier or subcontractor to observe the policies set out by AVK-SEG (UK) Ltd may lead to its exclusion from our panel of suppliers and subcontractors.

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### **AVK'S RESPONSIBILITY FOR ANTI-SLAVERY INITIATIVES**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

#### **3.1 Compliance of with the Statement**

You must ensure that you read, understand and comply with this statement.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains 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.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Managing Director as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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 you should report your concerns to [compliance@avk-seg.co.uk](mailto:compliance@avk-seg.co.uk) which will be dealt with in confidentiality.

### **AVK'S SUPPORTING POLICIES WITH REGARDS TO MODERN SLAVERY**

AVK 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

- **4.2 Equal Opportunities Policy** - AVK-SEG (UK) LTD's policy which covers our Objectives, Responsibility, Recruitment and Training, Pay, Benefits and Promotion, Maternity and Parenthood and Discipline and Breaches.
- **4.3 Recruitment Policy** - AVK-SEG (UK) LTD's policy which covers our Introduction, Advertising, Selection Process, Initial Interview, Second Interview.
- **4.4 Disclosures Policy** - AVK-SEG (UK) LTD's policy which covers our Introduction and Procedure

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Should you wish to see a copy of these policies kindly send an email to [compliance@avk-seg.co.uk](mailto:compliance@avk-seg.co.uk) titled AVK Policy Request.

### **AVK'S 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:

1. Establish and assess areas of potential risk in our business and supply chains;
2. Monitor potential risk areas in our business and supply chains;
3. Create an annual risk profile for each supplier;
4. Reduce the potential risk of slavery and human trafficking occurring in our business and supply chains;
5. Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our Supplier code of conduct;
6. and provide adequate protection for whistle-blowers.

AVK-SEG (UK) LTD ensures all suppliers of technology and technical services complete an AVK-SEG Supplier Questionnaire and they will be made aware of this 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.

For a copy of our Due Diligence Procedure please email [compliance@avk-seg-co.uk](mailto:compliance@avk-seg-co.uk).

### **AVK'S PERFORMANCE INDICATORS**

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring all staff to be introduced to our Modern Slavery Statement at induction;
- refreshers to be sent out via email every 6 months to all staff and subcontractors (Toolbox Talks)

### **AVK'S TRAINING FOR STAFF**

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 will be provided as necessary. The policy is review annually and communicated to all staff via email.

### **BREACHES OF THIS POLICY**

Our zero-tolerance approach to modern slavery will be communicated to all Suppliers, Contractors and Business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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

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

### **Approval:**

This statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 and constitutes AVK-SEG (UK) LTD's Modern Slavery statement for the financial year commencing 31<sup>st</sup> March 2021. This statement has been approved by the Board of Directors, who will review and update it annually.



13 January 2022  
Chris Pritchard  
Managing Director