

AVI-SPL Limited - Modern slavery statement

Our modern slavery and human trafficking statement is published pursuant to section 54 of the Modern Slavery Act 2015. Modern slavery is a crime and a violation of fundamental human rights which takes various forms, such as slavery, servitude, forced or compulsory labour, and human trafficking - all of which have in common the deprivation of a person's liberty by another, to exploit them for personal or commercial gain.

We have a zero-tolerance approach to any form of slavery, and we are committed to acting ethically and with integrity, in all our business dealings and relationships. We have implemented and continually review our business operations to ensure slavery of any form is not taking place anywhere in our business or supply chains.

As an equal opportunity's employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff and want everyone to feel confident that they can expose wrongdoing without any risk to themselves.

This statement applies to AVI-SPL Limited, and the information included in the statement refers to the financial year ending March 2025.

Organisational structure

AVI-SPL is a global leader in digital enablement solutions with offices across the United States, Canada, United Kingdom, Ireland, Germany, Switzerland, Dubai, Hong Kong, Singapore, India and Mexico. AVI-SPL delivers projects for world-class companies in the corporate, education, and government sectors, including Fortune 500/Global 1000 boardrooms, military base operation centres and education establishments. The company has over 4,400 professionals across 60 different offices globally and has completed over 120,000 projects in 80 countries.

AVI-SPL Limited was incorporated in 2012 and is head-quartered in Farnborough, with office presence also in London, wholly owned by US parent company AVI-SPL Global LLC.

Definitions

AVI-SPL considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

AVI-SPL acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions of the Modern Slavery Act 2015.

We understand this requires an ongoing review of both our internal practices in relation to our labour force and, and additionally, supply chains.

We do not enter business arrangements with other organisations, within the UK, Ireland, or abroad, which knowingly support or are found to involve themselves in slavery, servitude and forced or compulsory labour.

No labour provided to the business in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. AVI-SPL strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

Policies

The organisation has the following policies in place to help identify potential risk and exposure towards modern slavery, in addition to highlighting steps to minimize these:

- **Anti-Slavery Policy:** Highlighting our commitments and actions towards the prevention of modern slavery and human trafficking.
- **Supplier Code of Conduct:** AVI-SPL is committed to ensuring that its suppliers adhere to the highest standards of ethics set out in its Supplier Code of Conduct (available on request). Suppliers are required to declare 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. AVI-SPL works with suppliers to ensure that they meet the standards of the Code and improve their worker's working conditions. A copy of their modern slavery statement is sought annually from each supplier.
- **Public Interest Disclosure Policy:** We encourage an open culture in all our dealings with employees, managers and all people we come into contact with. Effective and honest communication is essential if malpractice is to be effectively dealt with. The policy provides guidelines to all our employees, casual, temporary agency staff, freelancers, trainees, home workers and contractors, who feel they need to raise certain issues, in confidence.

Ongoing Commitment

AVI-SPL Limited has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, AVI-SPL Limited are taking the following ongoing initiatives to ensure that modern slavery is not taking place:

- Ensuring our modern slavery commitment is updated and communicated internally, and externally each year – to outline our ongoing initiatives.
- All employees receive **AVI-SPL Global LLC's Human Trafficking Policy**, to reinforce their obligation to follow applicable laws and report concerns of illegal or unethical activity.
- Providing several policies and/or training modules to fully educate employees across areas of Conduct, including **Equal Employment** and **Anti-Harassment and Discrimination**.
- Ensuring individuals in procurement activity are trained in modern slavery requirements and process in line with guidance on GOV.UK
- Inclusion of a dedicated **Recruitment & Selection policy statement** within our employee handbook, in addition to ensuring that our UK recruitment team receive training on modern slavery and ethical employment practices.
- Ensuring standard terms with suppliers include our Supplier Code of Conduct and termination powers if the supplier is, or is suspected, to be involved in modern slavery.
- Continuing to take action to embed a zero-tolerance policy towards modern slavery.

Monitoring and Reporting

We undertake due diligence processes and regular risk assessments in each of our major business functions to ensure slavery and/or human trafficking does not take place within the business or supply chain.

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. If employees have a concern or suspicion that modern slavery may be taking place in any part of our business or supply chain of any supplier tier, they must raise it promptly with a member of Executive Management, or their local Human Resources representative.

Employees who wish to remain anonymous may report suspected violations through All Voices, AVI-SPL's third-party reporting vendor. Employees worldwide can report via AVI-SPL's reporting portal at <https://avispl.allvoices.co/> or externally through the [Modern Slavery Helpline](#).

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

Training & Awareness

We review our policy and accompanying statement on an annual basis to align and fully incorporate the principles of the Modern Slavery Act 2015. Our aim is to educate our employee base - all employees have direct access to the **Anti-Slavery policy**, and updated statement, in addition to the **Public Interest disclosure policy**. This information helps increase awareness of the key principles, to help identify any potential slavery or human trafficking issues - as well as understand where to seek assistance, both internal and external to the organisation. We also ensure function-specific training as set out in our Ongoing Commitment.

We encourage our employees to identify with this statement and without fear of retribution to report any concern they have in the wider community.

This statement is also easily accessible via the Intranet and posted on our website.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 23rd August 2024

Signed:



Michael Kellaway

Managing Director