
Anti-Slavery & Human Trafficking Policy

Document Reference	AVworx_AntiSlaveryPolicy_v6	Version	6.0
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Policy Owner	Managing Director	Approved By	Managing Director
Applicable Law	Modern Slavery Act 2015		

1.0 Policy Statement

This policy applies to all persons working for AVworx or on our behalf in any capacity, including employees at all levels, directors, agency workers, volunteers, agents, contractors, and suppliers.

AVworx strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. AVworx is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

2.0 Definition of Modern Slavery

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour, and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

3.0 Commitments

AVworx expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- AVworx has a zero-tolerance approach to modern slavery in our organisation and our supply chains
- The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for AVworx or on our behalf. Personnel must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy
- Staff awareness and training is managed through the Atlas Citation HR platform to ensure compliance
- AVworx is committed to engaging with stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain
- AVworx takes a risk-based approach to contracting processes and keeps them under review. We assess whether circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in contracts with third parties
- Using our risk-based approach, we will assess the merits of requiring suppliers to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking

4.0 Prohibited Practices

In support of the commitments set out in Section 3.0, AVworx and all persons working for us or on our behalf must adhere to the following specific standards. These provisions apply to AVworx own operations and, where AVworx engages third parties to supply workers, to those third parties:

- Adherence to all applicable local and national employment law
- Workers are free to terminate their employment on reasonable notice, without penalty
- No restriction on workers' freedom of movement, including outside of working hours
- No restriction on workers' freedom of association or right to join a trade union
- Zero tolerance of any threat of violence, harassment, or intimidation towards workers
- No worker is charged recruitment fees, directly or indirectly, as a condition of obtaining or keeping work with AVworx
- No compulsory or unpaid overtime is required of any worker
- Prohibition of child labour, in line with the definition set out in Section 2.0
- Prohibition of discrimination in recruitment, employment, and working conditions
- No confiscation or retention of a worker's original identification, immigration, or right-to-work documents
- Access to remedy, compensation, and justice for any individual affected by a breach of this policy, appropriate to the circumstances

5.0 Supply Chain Due Diligence

As part of our ongoing risk assessment and due diligence processes, AVworx may:

- Assess modern slavery risk within relevant supply chains and, where appropriate or contractually required, complete relevant customer or industry due diligence assessments and implement proportionate improvement actions arising from those assessments.
- Require employment and recruitment agencies and other third parties supplying workers to confirm their compliance with our Code of Conduct
- Require suppliers who engage workers through a third party to obtain that third party's agreement to adhere to the Code
- Carry out audits of suppliers for their compliance with our Code of Conduct where circumstances warrant it

6.0 Reporting and Enforcement

If AVworx finds that other individuals or organisations working on our behalf have breached this policy, we will take appropriate action. This may range from requiring remediation to terminating the relationship, depending on the circumstances and the best outcome for those affected.

Any suspected breach of this policy, or any concern relating to modern slavery, must be reported as soon as possible using one of the following routes:

- In the first instance, to the Managing Director
- Where the concern involves the Managing Director, or the individual does not feel able to report to them directly, to the Information Security Manager

Reports can be made confidentially. No individual will face adverse consequences or penalty for making a good-faith report, whether or not the concern is later substantiated. AVworx will treat all reports seriously, investigate promptly, and provide appropriate support and access to remedy for anyone affected.

7.0 Training and Awareness

All AVworx personnel receive awareness training on modern slavery and their responsibilities under this policy. Training is managed through the Atlas Citation platform, and records are maintained by the Managing Director.

8.0 Policy Review

This policy is reviewed annually by the Managing Director. Any updates are communicated to all personnel. This policy will also be reviewed following any significant changes to relevant legislation or AVworx supply chain arrangements.

9.0 Related Documents

- Supplier & Third-Party Policy
- Social Value Policy

10.0 Revision History

Version	Date	Author	Summary of Changes
1.0	Apr 2022	Managing Director / Operations	Initial creation and iterative updates including format conversion, content updates, logo updates, and minor formatting changes.
2.0	Mar 2023	Operations	Reviewed, no change
3.0	Mar 2024	Operations	Reviewed and updated logo
4.0	Oct 2025	Operations	Reviewed, no change
5.0	Mar 2026	Information Security Manager	Reformatted to AVworx policy template with document control table.
6.0	Jun 2026	Information Security Manager	Policy reviewed and updated to reflect current organisational practices, legislative requirements and supply chain arrangements