

# Modern Slavery & Human Trafficking Policy

# Modern Slavery Statement & Policy

Audio Visual Material is a trade only distributor of professional audio visual products with the registered office in **Lightwater, Surrey**.

## **Our commitment to the Modern Slavery Act 2015**

As a business we are committed to ensuring there is a transparency in our own businesses and in our approach to tackling modern slavery throughout the group and our supply chains. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard our existing workforce.

## **Responsibility**

The HR Manager is responsible for the continual review of our policies and procedures in line with UK employment legislation requirements including National Minimum Wage guidelines. Training provided through our training platform forms part of our induction process for all new employees and sub-contractors and is continually monitored to ensure compliance and understanding of:

- Employee Code of Conduct
- Eligibility to work in the UK
- Respect in the workplace

## **Risk Assessment**

The Board of Directors have ultimate responsibility for overseeing our human rights compliance. Within the local operations, the senior management team will maintain an ongoing assessment of the risk of exposure to modern slavery and human trafficking.

## **Due Diligence/Investigations**

There have been no known or suspected instances of slavery or human trafficking.

## **Our supply chains**

Our supply chains and services span across the UK and overseas. In 2016 we introduced a mandatory requirement for suppliers to declare their compliance with Section 54 of the Modern Slavery Act if they were within the scope of the Act as part of our procurement process.

## **Embedding the principles**

Over the past 12 months we have maintained our commitment to:

- Make staff and sub-contractors aware of the Modern Slavery Act 2015 and how to take appropriate action if they suspect slavery or human trafficking. Our training incorporates:
  - What is modern slavery and human trafficking
  - How to identify the signs of slavery and human trafficking
  - What steps to take and how to report should slavery or human trafficking be suspected

During the next 12 months we will continue to incorporate our findings from our supplier assessment into our procurement process and regularly undertake due diligence when considering partnering with new suppliers.

As well as training staff, AVM Ltd will raise further awareness of modern slavery explaining the basic principles by issuing posters across our premises and adding a statement on our internal communication network.

# Modern Slavery and Human Trafficking Policy & Procedure

## 1. POLICY STATEMENT

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 any 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 exacting standards.

This policy applies to all persons working for us or on behalf in any capacity, including employees at all levels, Directors, agency workers, volunteers or contractors.

This policy does not form part of an employee's contract of employment and we may amend it at any time.

## 2. RESPONSIBILITY FOR THE POLICY

The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

The HR Manager 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, up to date training.

## 3. COMPLIANCE WITH THE POLICY

Employees must ensure that they read, understand and comply with this policy.

The prevention, detecting 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. Employees are required to avoid any activity that might lead to or suggest a breach of this policy.

Employees must notify their manager or HR Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Employees 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 are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, please raise it with your manager or HR Manager.

We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy. 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 business or supply chain. If, after reporting a genuine concern you are subject to detrimental treatment including dismissal, disciplinary action, threats or unfavourable treatment, you should inform HR immediately.

**4. COMMUNICATION AND AWARENESS OF THIS POLICY**

Training on this policy will be provided and will form part of our induction process for all new employees, existing staff and sub-contractors.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers and contractors.

**5. BREACHES OF THIS 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.

Signed



**Chris Athanasiou**



**Mark Nisbet**



**Colin Nixey**



**Caroline Wells**

Directors

Adopted 15 February 2019

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