

HUMAN TRAFFICKING AND SLAVERY STATEMENT

Version 1 – January 2021

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1. Introduction

1.1 Avis Group and its companies welcome the introduction of the Modern Slavery Act 2015 (the "Act").

1.2 The aim of the Act is in line with our own vision and values.

For this reason, we applaud any measures which seek to bring about greater transparency and scrutiny into our various supply chains, in order to combat slavery and trafficking activities. In accordance with the legislation, this Statement takes into account the introduction of various measures throughout our supply chain management from 2020 onwards, with the aim of reducing the risk of slavery and trafficking activities being present within our business operations. It also sets out additional activities to be carried out throughout 2021 to add greater rigour and scrutiny to those measures

1.3 We look forward to working with our partners, subcontractors and suppliers to bring any necessary changes into effect, and then to review their effectiveness and consider any changes or additional measures which such a review highlights. We are committed to improving our practices through these initial activities, and through improvements identified in future years, to combat slavery and human trafficking.

2. Organisational Structure and Business

Avis Group comprises of Avis Mechanical LTD and Avis Contracts LTD, the Head Office for both companies is located in Brentwood, Essex.

Avis Mechanical LTD provides Plumbing and Heating Installation for New Build Homes primarily in Essex and London. Avis Contracts LTD provides Carpentry and Fit-Out Installations for New Build Homes primarily in London.

The Group has approximately 67 employees and operates in the United Kingdom only.

3. Our Supply Chains

3.1 Our supply chains include:

- Consultants and advisers
- Contractors and sub-contractors
- Suppliers of goods, supplies and materials for all stages of the construction cycle
- Suppliers of plant and machinery

3.2 We have identified the following areas of the supply chain as comprising the highest risk of slavery and trafficking activities:

•Human trafficking – in circumstances when using sub-contracted labour forces, where coerced/trafficked gangs may be present.

•Slavery and human trafficking – in circumstances when using materials such as 'conflict minerals' (tantalum, tin, gold or tungsten), steel, or other raw materials being predominantly sourced from countries with poor records on slavery and human trafficking.

4. Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The practical measures we have taken and will be taking throughout our Group operations are reflected throughout this Statement and our Anti-Slavery Policy, and will be built upon and developed throughout the coming years to incorporate best practice into our operations.

5. Due Diligence Processes and Supplier Adherence

5.1 We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme.

5.2 As part of our initiative to identify and mitigate risk the following measures were put in place before the end of 2020.

- Contacting existing suppliers and sub-contractors to ask them to confirm their adherence to our Anti-Slavery Policy.
- Ensuring that new suppliers and sub-contractors undertake to comply with our Anti-Slavery Policy through use of due diligence questionnaires and relevant contractual provisions, with appropriate termination provisions for failure to comply.
- Ensuring that the high-risk areas as identified under paragraph 3.2 are kept under regular review to determine whether additional and/or targeted measures are required within our supply chain to combat the risk of slavery and trafficking.
- Inclusion of modern slavery and human trafficking risk on all Group company risk registers for monitoring going forwards, to be reviewed every six months in accordance with Group practice.

5.3 These measures are required in order to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

6. Compliance

The personnel responsible for compliance with this Statement and the Anti-Slavery Policy, and for updating and improving our procedures in forthcoming years, shall consist of involvement from the following departments:

- Legal.
- Human resources.
- Procurement.
- Management Services

7. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we shall be implementing a series of training to all of our staff, highlighting the requirements of the Act and our Anti-Slavery Policy, and its practical application within our Group businesses.

8. Measuring Effectiveness

8.1 We used the following key performance indicators (KPIs) to measure how effective we were prior to the end of 2020 to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- 75% of existing sub-contractors and suppliers on our approved list to commit to our updated due diligence questionnaire confirming their compliance with our Anti-Slavery Policy
- 100% of new sub-contractors and core suppliers to confirm via our due diligence questionnaire that they will comply with our Anti-Slavery Policy
- 100% of new supplier and sub-contractor contracts to contain provisions requiring compliance with our Anti-Slavery Policy.

8.2 Our performance against these KPIs during the period up to April 2021 is as follows:

- 100% of existing subcontractor and core supplier contracts have committed to our updated due diligence questionnaire confirming their compliance with our Anti-Slavery Policy.
- 100% of new core supplier and sub-contractor contracts have contained anti-slavery provisions since the clauses were introduced in January 2017 (92 new subcontractors were added to our approved list in 2018).
- In addition, 100% of existing land development consultants and professional legal advisers have been contacted to ensure that the required anti-slavery provisions are retrospectively incorporated into their appointments.

9. Ongoing Review

This Statement and the Anti-Slavery Policy will be subject to regular and ongoing reviews (at least annually) to ensure its effectiveness, and to update the requirements where further measures are identified.