



## MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

Avenir Digital Limited recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Company provides technology enabled business process and customer management services and professional services to a mixture of private and public clients. We have an employee base of 250 and predominantly operate from three core countries, of which the majority of staff are based in the UK. The remainder are in India and UAE. We are not a manufacturer or handler of raw materials.

And likewise we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business.

We are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy Statement 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.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Management System, compliant with the requirements of ISO 9001:2008. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the management to ensure its continuing suitability and relevance to the company activities

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):-

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;





- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers and Quality Advisors;
- Use of payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

For transparency the company will publish the Modern Day Slavery & Trafficking Act 2015 Policy Statement on its website for the public, consumers and employees to view.

The Avenir Digital CEO is the main board director with primary responsibility for implementing this statement within our wider framework for managing corporate responsibility and for reporting annually to the Group Board. We will update and issue this statement annually to confirm the actions taken to ensure that slavery and human trafficking is not taking place in our supply chain or own businesses.

This policy applies to all those employed by Avenir Digital Limited.

For more information please contact:

info@avenirbs.co.uk

Date: December 2017

**(Suresh Kumar Kondapureddy)**  
CEO





## Code of Conduct

Avenir Digital is committed to ensuring good standards among its suppliers and engaging with the supply base to bring about improvement. Avenir Digital will only work with reputable suppliers who are committed to working towards compliance with the conditions set out in this code. A process of self-evaluation, independent audit and training is in place to ensure that continuous improvement is made.

### **1. Employment is freely chosen**

There is no forced, bonded or involuntary prison labour.

Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

### **2. Freedom of Association And The Right To Collective Bargaining Are Respected**

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### **3. Working Conditions Are Safe And Hygienic**

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

A member of senior management shall be assigned responsibility for health and safety.

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Address: Unit 301, Cannon Wharf, Pell Street, Surrey Quays, London SE8 5EN.

Website: <http://avenirdigital.ai/> Phone Number: +44 (0) 2037357262





#### **4. Child Labour Shall Not Be Used**

There shall be no recruitment of child labour.

Where child labour is found, the employer shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined below.

- i. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- ii. The policies and procedures relating to the employment of children shall conform to the provisions of the relevant ILO standards.

#### **5. Working Hours Are Not Excessive**

Working hours comply with national laws and benchmark industry standards, which ever affords greater protection.

In any event, workers shall not on a regular basis be required to work in excess of 40 hours per week and shall be provided with at least two days off for every 7-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

#### **6. No Discrimination is Practised**

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

#### **7. No Harsh Or Inhumane Treatment is Allowed**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

This policy will be reviewed on an annual basis and its implementation is the responsibility of the CEO.

Approved by the Board of Avenir Digital Limited

Date: August 2017

**(Suresh Kumar Kondapureddy)**  
**CEO**

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# Avenir Digital Limited

## Environmental POLICY

Classification	PUBLIC
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Version	1.0
Date of Issue	01st March 2018
Date of Next Review	28th February 2019

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Expiry Date

Not Applicable



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# **POLICY**

**1**

## **AUDIENCE**

**1.1**

This document must be read in conjunction with all other Avenir Digital Policies.

**1.1.1**

This document is to be read by all workers, including permanent, contract and temporary personnel.

**1.1.2**

This document may be provided to third parties without approval from Avenir Digital Team.

**1.1.3**

## **REQUIREMENT**

**1.2**

Avenir Digital is committed to the prevention of pollution and will work to minimise the impact of its operations worldwide through a continual improvement program.

**1.2.1**

**1.2.2**

Avenir Digital Limited recognises that the effective implementation of the policy represents an opportunity to improve the performance of the Group by reducing environmental risks and impacts, and increasing the efficiency of our operations

## **CONTACTS**

**1.3**

For further information or should you have any questions, please contact the Avenir Digital by emailing [info@avenirbs.co.uk](mailto:info@avenirbs.co.uk).

**1.3.1**

## **NON-COMPLIANCE**

**1.4**

Non-compliance with this policy may result in disciplinary and / or criminal proceedings against the worker, which may include their managers.

**1.4.1**

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## 2 POLICY STATEMENT

*The following is a copy of the statement issued by Avenir Group CEO mandating this Policy as the minimum baseline which all Avenir Digital Limited business units must comply with.*

We recognise that our day to day activities impact on the environment. We wish to minimise any harmful impacts wherever and whenever practicable, and will work to secure business benefit from environmental protection across all our operations worldwide.

Avenir Digital Limited is committed to the prevention of pollution and will work to minimise the impact of its operations worldwide through a continual improvement program.

In particular efficient use of natural resources by conserving energy and water, minimising waste, and recycling where possible

- Comply with all applicable local, national and international environmental legislation, regulations and other requirements to which we subscribe
- Meet our duty of care requirements in relation to waste by ensuring the safe keeping, transportation and subsequent recovery or disposal of waste
- Use recycled materials whenever these can be commercially justified
- Keep transport use to a minimum and regularly service vehicles to maintain their efficiency
- Work with suppliers to ensure they recognise and reduce the environmental impact of their products and transportation.
- Integrate environmental and sustainability considerations and positive impacts into our projects and practices

To achieve these we will:

- Set environmental objectives based on the significant environmental aspects across the business,
- Allocate sufficient financial and managerial resources
- Communicate this policy to all employees and those working on our behalf.
- Measure, monitor and report on our environmental performance.
- Review our policy on a regular basis to take account of new developments in environmental management and legislation.
- Perform periodic audits of our activities to ensure compliance with company requirements, legislation and policy requirements.

Avenir Digital Limited recognises that the effective implementation of the policy

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### 3 DOCUMENT REFERENCES

Related Documents	<p>All Avenir Digital Limited plc Group Health &amp; Safety Policies, found on <a href="http://avenirdigital.ai">avenirdigital.ai</a></p> <p>All Avenir Digital Limited plc Group Health &amp; Safety Policies, found on Avenir Digital Limited Connections under <i>Business Support &gt; Health and safety &gt; Domestic SHE Procedures</i></p> <p>All Avenir Digital Limited plc Group Health &amp; Safety Policies, found on Avenir Digital Limited Connections under <i>Business Support &gt; Health and safety &gt; Service Delivery Health and Safety</i></p> <p>Local Business Unit Policies, where applicable</p> <p>Local Business Unit Standards, where applicable</p> <p>Local Business Unit Processes and Procedures, where applicable</p>
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## 4 DOCUMENT CONTROL

### DOCUMENT HISTORY

Issue	Date	Purpose	Author
0.1	28/02/2018	First Draft for review by Prakash Singh	Suresh Kumar Kondapureddy


### DISTRIBUTION

Name	Organisation	Role
Avenir Digital Connections	Avenir Digital Limited	Avenir portal/websites

### REVIEWERS

Name	Organisation	Role	Signature	Date
Prakash Singh	Avenir Digital Limited	Group Manager	Prakash	

### PRODUCT APPROVAL

Name	Organisation	Role	Signature	Date
Suresh Kumar Kondapureddy	Avenir Digital Limited	CEO		

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# Avenir Digital Limited

## HUMAN RIGHTS POLICY

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Version	1.0
Date of Issue	01st March 2018
Date of Next Review	28th February 2019
Expiry Date	Not Applicable

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# 1 POLICY

## 1.1 AUDIENCE

**This document is to be read by all employees, including permanent, contract, temporary personnel and subcontractors.**

**This document may be provided to Third Parties without approval from Group CEO.**

## 1.2 REQUIREMENT

### Introduction

Avenir Digital is committed to respecting the human rights of individuals in all aspects of its operations in the UK and internationally. We also recognise that we have an opportunity to ensure that human rights are understood and observed in the areas that we work.

We are dedicated to providing a safe working environment in which we meet our obligations regarding health and safety, security, equality & diversity and to ensuring that the respect and dignity of all our employees is adhered to at all times.

This policy applies to all the Group's businesses, employees, contractors and subcontractors.

### Our commitment

We support the principles set out in the following international standards:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Core Conventions of the International Labour Organisation

Within our remit, we encourage others to support these standards and ask our suppliers to confirm compliance in their operations.

### Policy

We understand our responsibility to respect the human rights of our employees and those of the communities in which we operate. As a services business, we have identified three main areas of responsibility:

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- Labour and workplace rights including fair working conditions
- Freedom of association
- Development of local communities where we work through our community programmes

## Labour and workplace rights

We provide fair working conditions for our employees including terms and conditions of employment, remuneration, working hours, health & safety, resting time, holiday entitlements and benefits. These are applied according to territory specific statutory requirements. In addition, our Responsible Sourcing Policy outlines the standards that we expect from our suppliers.

- **Child labour:** we will eliminate child labour, where it exists, with a manner consistent with the best interests of the children concerned. Where relevant we will develop and participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. We will not employ children and young persons under 18, at night or in hazardous conditions. In any event, the course of action we take shall be in the best interests of the child, conform to the provisions of ILO Conventions 138 and be consistent with the United Nations Conventions on the Rights of the Child.
- **Wages and hours:** Pay will not be lower than that required by local law or, in the absence of a law, the level paid generally within that industry. Hours of work will be in line with local law or, in the absence of a law, the norm within that industry and shall not be excessive, employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis.
- **Diversity:** Whilst being sensitive to cultural differences we expect the development of equal opportunities in employment without discrimination on grounds of race, religion, and gender or any other arbitrary means.
- **Employment:** Forced or compulsory labour is prohibited. Employees should not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited. Permanent employment relationships and the obligations from such will not be unreasonably avoided. The employment models deployed will be in line with territory specific law and practices. Under these practices there will not be excessive use of alternative models such as sub-contracting or labour-only contracting.

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**Working conditions: Policies and procedures for health and safety, as a**





minimum, meet legal requirements and where these do not exist, are sufficient to protect the well-being of employees.

### **Freedom of association**

We respect the right of our employees' to join or not to join a trade union and as such they are free to join an organisation of their choice to represent them in line with local legislation. Where local rights to Collective Bargaining exist it will be allowed.

As outlined in our Responsible Sourcing Policy, we also ensure that suppliers respect their employees' right to freedom of association.

### **Development of local communities**

Through our community investment programmes, we strive to make a positive contribution and leave a lasting impact in the communities where our employees live and work. Our programmes vary between geographical location and look to address local need.

### **Communication and training**

This Human Rights policy should be read and operates in conjunction with our:

- Prevention of Modern Slavery Policy
- Ethical Conduct Statement
- Responsible Sourcing Policy
- Statement of Business Principles
- Anti-bribery & Corruption Policy
- Equality and Diversity Policy
- Anti-Harassment and Bullying Policy
- Safety, Health and Environment Policy
- Speak-up Policy
- Open Door Policy.

Our intranet ensures all our employees have access to the same policies. This is supported by local micro-sites providing territory specific information which ensures that all of our businesses are comfortable with the standards and resulting action plans, in the UK and internationally.

In addition we have dedicated online mandatory training modules for Information Security, Equality & Diversity, Health & Safety, Data Protection, Information Security, Fraud Awareness and Anti-Bribery which highlight these policies for our employees. These are further embedded by local business units through comprehensive role specific induction and training which include a range of tailored tools for managers and directors.

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Adherence with this and associated Group policies is the responsibility of business management and overseen through our Group-wide risk governance processes.

Group Risk & Compliance provide further second line oversight on key Group policies, reporting back through Group governance with any issues arising. Group Internal Audit also check adherence to key Group policies through their audit activities.

## **Review**

The policy will continue to be monitored and reviewed by the Corporate Responsibility Steering Group in respect of its suitability and effectiveness.

We also work in consultation with our stakeholders, particularly our clients, to make sure we are meeting their expectations.

## **1.3 Contacts**

For further information or should you have any questions, please contact the Avenir Digital team by emailing [Info@avenirbs.co.uk](mailto:Info@avenirbs.co.uk)

## **1.4 Non-compliance**

Non-compliance with this policy may result in disciplinary and / or criminal proceedings against the worker, which may include their managers.



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## 2 DOCUMENT REFERENCES

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