

Avance Consulting (Europe) Limited

MODERN SLAVERY ACT STATEMENT

Introduction from the Board of Directors of Avance Consulting (Europe) Limited (“Avance”)

Avance Consulting (Europe) Limited (“Avance”), along with its subsidiaries and affiliates, (“Avance Group”) promotes, fosters and encourages the highest professional, legal and ethical standards at least equal to and developing in excess of industry norms.

As part of those standards, a priority for Avance and Avance Group is to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

Slave labour is estimated to be valued in excess of US\$150 billion annual business, managed by organised groupings and networks of shell corporations supported and financed by organized crime, drug cartels, and terrorist organizations that use modern methods to hide their true identities. Unfortunately, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

This statement is made in accordance with *Section 54, Part 6 of the Modern Slavery Act 2015* (“the Act”) and sets out the approach and steps that Avance has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business, including KYC checks. This statement is in respect of Avance’s financial year ended FY 22-23 and was approved by the Avance Board on [27th March 2023].

Central to the steps we take to combat these issues are know your customer (KYC) regulations, which are fundamental to virtually every major nation’s financial regulatory framework. In basic terms, financial regulations require businesses to be able to accurately identify their clients, agents, consultants, and other vendors and confirm that they are compliant with anti-money laundering and anti-bribery laws.

Avance is compliant with all relevant global authorities operating in different parts of the world. Financial regulations vary country-to-country, but usually follow a similar pattern. In the UK, KYC provisions are part of the Money Laundering Regulations and enforced by the Financial Services Authority (“FSA”), HM Revenue and Customs, the Law Society, and the Institute of Chartered Accountants.

As part of our review of customers and suppliers, we verify identity and track record of suppliers and customers alike, pay scales in geographical locations where we and our customers operate, for example, to ensure that pay offered to our candidates is a living wage, we carry out know-your-client and other anti-money laundering checks.

Organisation's structure

We are a provider of recruitment services in the information technology, banking, financial services, legal and other professional sectors. We offer staffing, recruitment and software services and solutions to global organizations in specific sectors as published on our website.

Avance is based out of London, United Kingdom, with branches in Germany, Netherlands, Asia Pacific nations, the USA and other published geographies. Avance and Avance Group currently has over [750+] employees worldwide.

The Act requires commercial organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual 'Slavery and human trafficking statement'. The statement sets out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain.

Our business

Our business is organised into ten business units: Banking and Financial Services, Specialized Engineering, Legal, Information Technology, Manufacturing, Construction and Logistics, Healthcare, Health, Safety & Environment, Oil & Gas.

Our supply chains

Our business largely uses professionally qualified people employed directly by Avance or Avance Group or seconded from associated recruitment firms in a limited number of countries. Our people policies ensure fair treatment of our people around the world.

Our external suppliers and clients are mostly UK, APAC, US and EU based companies in low risk sectors (such as the professional services we describe above).

Given the nature of the services we provide and the highly skilled and professional workforce we employ or engage, we assess the risk of modern slavery or human trafficking in our own organisation to be very low to negligible.

Our Service Flow

Our service flow comprises primarily services, including staffing and recruitment services, and IT staffing services. We regularly examine and review our service flow and consider the overall risk of modern slavery to be extremely low to negligible by reason of:-

- the nature of the services which we procure (service-based with a predominantly skilled professional workforce for IT staffing needs across the industry sectors described above).
- the geographies from which we engage with and recruit staff, consultants and personnel.
- our procurement practices which focus on professions.
- market-related pay and rewards reviewed annually including by our customer and supplier base.

Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in our service flow or in any part of our business. We continuously review and update all our policies.

Avance's policies reflect our commitment to acting ethically and with integrity while providing or availing services and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our service flow.

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. We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- [Code of ethics and behaviours].
- [Vendor Code of Conduct.]
- [Whistleblowing policy].]

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

Our specific procedures to address modern slavery risk include:

- An 'Anti-slavery policy' for our people, which sets out the key issues and how we should respond including a process for raising concerns internally
- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace.
- Robust recruitment processes in line with relevant employment laws.
- Market-related pay and rewards reviewed annually.
- Initiatives to support our people's physical and mental wellbeing and lifestyle choice.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we also have in place systems to:

- Identify and assess potential risk areas in our supply chains and work flows.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains and work flows.
- Monitor potential risk areas in our supply chains and work flows.
- Protect whistle blowers.
- Supplier adherence to our values and ethics.

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 including a Vendor Code of Conduct.

We have a compliance team, which consists of involvement from the following departments:

- Legal.
- Audit and compliance.
- Human resources.
- Procurement.
- Sales.
- 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 provide training to our staff.

Our effectiveness in combating slavery and human trafficking

We perform assessments at regular intervals to continue to minimize the risk of modern slavery in our service flow and service providers and have required our suppliers to reflect our position in respect of anti-slavery policies including our external consultants together with internal stakeholders who manage our vendors, suppliers or consultants.

To the date of this statement, neither Avance nor Avance Group has had any identified instances of modern slavery.

Our KPIs include our **Internal Assessment** processes which reflect the relative risk for potential vendors, suppliers, consultants and include:

- Checks against global sanctions and enforcement databases by professionals having expertise in it and subject to adverse media review to identify risks including human rights abuses, human trafficking and labour violations.
- Potential vendors, suppliers, consultants identified based on the gravity of the risk as low, medium or high and are subject to further vetting and evaluation based on the specific vendors, suppliers, consultants' circumstances. This includes higher risk and higher invoiced vendors, suppliers, consultants, who will be provided with a questionnaire and asked about their current and effective implementation of their policies and procedures in place regarding human rights, modern slavery, forced labour, child labour or human trafficking.
- A vendor Code of Conduct which all vendors, suppliers, consultants are expected to comply with. As part of the vendor Code of Conduct, Avance requires all vendors, suppliers, consultants to adhere with the applicable legal requirements of slavery, forced labour and human trafficking laws globally which includes but not limited the UK Modern Slavery Act 2015 and at Avance we expect our vendors, suppliers, consultants to enable practices to ensure compliance with all such applicable laws.

Current and Future processes

At Avance we do not tolerate slavery, forced labour or human trafficking in any form and expects our vendors, suppliers, consultants to comply with and to adhere to the same standards.

We have established processes and updated our standard contracts for use at a global level with all our vendors, suppliers, consultants entering into new contractual arrangements with us to confirm their compliance with the Modern Slavery Act 2015 as well as other applicable global laws relating to modern slavery. We also require such parties to warrant that they have not been

convicted of any offences relating to slavery or human trafficking; and to ensure they implement due diligence procedures in their own supply chains.

Our internal policies define a set of expectations for the behaviour of all Avance employees and representatives. As summarised in our policies, our commitment to human rights informs whom we serve and on what topics, and we will not do work that supports or enables human-rights violations.

We are planning to establish a new vendor vetting and onboarding process and technology platform that embeds in its risk assessment an evaluation of modern slavery based on criteria such as the country of operation and government response, as assessed by the Global Slavery Index.

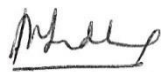
Avance continues to support our human rights-related policies and our regular awareness and training to minimize the risk of Modern Slavery. Every employee or representative of Avance has the right to raise concerns about values, ethics and professional conduct without fear of retribution and we are planning to setup a **whistle blower code**, in addition to our Whistleblower Policy. In addition to clearly defined internal channels, we have a global email i.d. that allows our employees to raise concerns relating to potential violations of laws and our policies, professional standards and values in a confidential manner and, where legally permissible, anonymously.

We remain committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of Avance’s business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Avance’s slavery and human trafficking statement for the financial year ending [FY 22-23]. It was approved by the board on [27th March 2023].

Avance takes responsibility for this Statement and its related objectives and will review and update it in accordance with the Modern Slavery Act 2015.

Updated [7th May 2024]



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[Pravin Dudhe]

Date: 09/05/2024