

Modern Slavery Statement 2022/2023

Avoira is committed to ensuring that it is free from acts of modern slavery from within its own business and within its supply chain. The Company acknowledges responsibility for implementing the requirements of the Modern Slavery Act 2015 and will ensure transparency within the business and with suppliers of goods and services to the organisation.

Avoira takes a long-term view of what is right and will remain committed to the continuous improvement of delivering high standards to meet the expectations of our customers, stakeholders and to protect the human rights of those engaged within, and supplying to, our business.

We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or any part of our business.

Our Business

Avoira one of the largest independent telecommunications and technology supply specialist in the UK – with a turnover of £24.6m and over 150 dedicated staff.

Tracing our roots back to 1976 we were incorporated in 1983 and we work with big name brands such as Motorola, Avaya, Poly, Yealink, Samsung, Panasonic, and Microsoft.

The technology we supply, and support helps major blue-chip companies and smaller enterprises to perform smarter and more efficiently. We supply sophisticated Unified Communications, IT, and Video Conferencing systems, as well as headsets, telephones and network routers. We also provide network connectivity and mobile services as well as audio visual, two-way radios – plus more.

The year 2019 saw the creation of Avoira.

Avoira is the fusion of four business entities: Pennine, Videonations, Co-Channel, and Rocom. They are all long-established, renowned, and trusted specialist providers from the communications industry – merging together to supply fluent technology solutions to UK businesses.

Our Supply Chain

The supply of products is managed through the procurement team. We buy a wide range of goods; the majority being sourced from reputable suppliers in the UK and the EU.

Our policies

Our companies and employees operate under a number of policies to ensure high standards of social, governance and ethical compliance. All policies are available internally on Avoira's intranet with key policies placed on the website.

Our **Code of Conduct** sets out how we are committed to acting ethically and with integrity in our business operations and towards our employees. We also expect our suppliers to understand, take responsibility and ownership for implementing their own Code of Conduct standards throughout their own supply chains and business operations.

Equality & Diversity policy/Anti- Bullying policy - We have zero tolerance for any threat of physical or sexual violence, harassment or intimidation against employees. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid at least the national minimum wage. Our employees will not be forced to work in excess of the number of hours permitted in law.

Recruitment Policies – On the rare occasion we use agency staff, we use only specified, reputable employment agencies that operate nationally under the REC to source agency workers. All employees are checked for their right to work in the UK status.

Whistleblowing Policy - We encourage all our employees, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of the Avoira. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of reprisal

Training

We provide adequate information and training to all our employees, examples include:

- Induction for all new joiners including information on our policies and processes.
- Leadership training for our Managers
- Employees and Managers are supported by our HR Team

We regularly review all our policies and identify areas for improvement.

Due Diligence

Supplier Selection

Quality, ethics & compliance are a part of our supplier selection.

Avoira have embedded Modern Slavery due diligence into the supplier onboarding process, and all new suppliers are checked for compliance.

The Initial selection is carried out by way of a supplier onboarding questionnaire. This covers financial stability, human rights, quality, environmental impact, working standards, modern slavery, anti-corruption and IT security. New suppliers must self-declare and sign that they have as a minimum policies in place to cover the above areas. A risk analysis is then carried out to determine whether it is suitable to work with the company.

We aim to look for diverse range of suppliers that are ethical and stable to do business with. When we select who we decide to work with we make sure our Terms are clear and transparent and support the group values and our corporate social responsibility objectives. In effect, we build relationships with companies that support and adopt similar principles to ourselves.

Contracts

We flow our code of conduct ethos through all aspects of supplier sourcing and management including our supplier contracts, purchasing processes and auditing.

Our procurement contracts for existing and new suppliers cover ethics, anti-slavery, good ethical trading standards, safety and human rights. We also reserve the right to request compliance information and to audit if decided.

Our employees

We see our people as our most valuable asset and as such we foster an environment where employee well-being is a priority. We encourage an open workplace where employee's feel comfortable reporting any issues or concerns about any conduct they believe to be, unlawful, fraudulent, or unethical, with guaranteed anonymity if requested.

SEDEX membership

We are a member of the world's largest collaborative platform for sharing responsible sourcing data on supply chains. We can share and view information on registered supplier's greater visibility of any risks working to improve working conditions in global supply chains.

Future Plans

This year we will continue to identify, assess and manage risks.

During any procurement process we will continue to gather info from suppliers about their awareness and compliance with the Act.

We will continue to ensure appropriate contractual provisions are written into supplier contracts

This statement has been approved by the organisation's board of directors, who will review and update it annually



Dr Andrew Roberts
Managing Director
Avoira Limited