

LENGHA

LENGHA LIMITED MODERN SLAVERY STATEMENT

Our business and supply chains

Lengha Limited conducts our business with integrity. We are committed to the prevention of slavery and human trafficking in our business and in our supply chains. We procure goods and services in a sustainable and ethical manner in compliance with our values and relevant law and policy, including the Modern Slavery Act 2015.

We do not accept slavery or human trafficking in our business, and we will not work with others in our supply chain who do not share our commitment to preventing slavery and human trafficking. If you wish to see our Anti-Slavery Policy, please ask us. If you have any concerns or suspicions, we should know about them please contact@aralondon.com.

Lengha Limited is a company based and registered in UK, with registration number 07396451, trading as ARA London. We are a full-service company offering products and services to private and public sector clients both in the UK and internationally. Our core business areas are medical products, energy (renewables and oil & gas), infrastructure and property.

Our supply chains include providers of goods and services to both our clients, and to our company. For example, we engage international partners, experts, and manufacturers on behalf of our clients to source and provide goods and services. Goods and services provided to our company include medical good manufacturers, construction goods, accountancy services, taxis, logistics companies and engineering advisory.

Compliance

In relation to the financial year ending 31 October 2021, we have reviewed our compliance approach in line with the 2017 UK Government guidance on Transparency in Supply Chains, the 2019 UK Government guidance on modern slavery statements conducted a slavery and human trafficking risk assessment of our business and our supply chains, as explained below:

- issued a slavery and human trafficking check list to selected suppliers
- rejected suppliers based on their unwillingness to be transparent and provide appropriate approvals and certification.
- held discussions at a senior level with the companies we work with to ensure compliance
- reviewed our Anti-slavery Policy, which identifies the firm's Managing Director as the Anti-slavery Compliance Officer with overall responsibility for implementing this Policy
- reviewed and updated our supplier onboarding processes to ensure our slavery and human trafficking where appropriate to new or prospective suppliers
- arranged for partners with direct responsibilities for engaging with suppliers to undertake a bespoke anti-slavery and human trafficking dialogue to ensure our supply chain is fully transparent.

- reviewed the Key Performance Indicators (KPIs) against which to assess our progress on slavery and human trafficking issues.

Our Anti-slavery Policy documents our commitment to conducting our business with integrity, transparency and fairness and the steps we take to ensure that slavery and human trafficking is not present in our business or in our supply chains. This Policy applies to our partners, all our colleagues and to our suppliers, including those who work for or on our behalf in any capacity and includes a mechanism whereby concerns can be escalated confidentially.

The company's commitment to help abolish Modern Day Slavery and our anti-slavery policy includes guidance with examples of unusual behaviour displayed by workers which may be indicative of someone experiencing slavery or human trafficking. It makes it clear that Lengha Limited will support anyone who raises a genuine concern in good faith.

Our Anti-slavery Policy builds on our company's existing policies covering Procurement, Equality, Diversity, Dignity at Work, Grievances, as well as other internal training we provide.

We have also engaged with internal experts who advise governments and companies on their Modern-Day Slavery policies and practices, so much so that we introduce these experts in the industries we work in.

Due diligence in our supply chains

We have reviewed and will continue to review our central list of suppliers. We have conducted a risk assessment of our supply chains regardless of annual spend, invoice frequency and a combination of other relevant factors.

Our slavery and human trafficking questionnaire and onboarding processes communicate our commitment to complying with the requirements of the Modern Slavery Act 2015 and seeks information on, amongst other things, the nature of the goods or services supplied, and anti-slavery policies and procedures.

Partners and affiliated workers are encouraged to report any issues and grievances to our companies. We organise spot checks with our partners to visit suppliers and manufacturers we are using to ensure they are compliant.

Training

All colleagues are required to certify that they have read and understand our Anti-slavery Policy. A process is in place to monitor and enforce this requirement. This Policy is discussed with new consultants and partners we work with.

We have also arranged for colleagues with direct responsibilities for engaging with suppliers to undertake a bespoke anti-slavery and human trafficking check list. We want to ensure that we are hands on as possible in eliminating these practices.

Key Performance Indicators

We use the following 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:

- number of colleagues and partners having confirmed that they have read and understood Lengha's Anti-slavery Policy
- nature of and number of Anti-slavery Policy breaches reported to the Managing Director
- number of Policy breaches assessed within a reasonable time of being reported and further investigations concluded as soon as possible thereafter
- frequency and nature of follow-up communications, as appropriate, with relevant suppliers, or potential suppliers, in relation to our slavery and human trafficking risk questionnaire or supplier take-on process.
- engagement with Anti-slavery experts to ensure we are checking constantly for any new developments and up to date with training.

While we continually check our KPIs and take the necessary steps to deal with any changes in risks and possibilities of breaches, we will also highlight areas which need to be monitored with new and existing suppliers, and buyers. We have already adapted our corporate culture and supply chain review whilst supplying goods and services linked to and under Covid-19.

We know that we will be unable to eliminate all instances slavery and trafficking, we will endeavour to highlight to our partners our own corporate culture and intolerance of such practices. We will continue to commit to our pledge and keep working with the international experts to look out for

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Lengha Limited slavery and human trafficking statement for the financial year ending 31st October 2020.

This statement was approved by Lengha Limited members on 31st October 2021.