

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31.

Abrialle Engineering & Consultancy limited ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

## Organisational Structure

Abrialle Engineering & Consultancy limited and has business operations in the United Kingdom.

We operate in the Electrical, electronic, civil and telecommunications engineering and consultancy sector. The nature of our supply chains is as follows: Abrialle Engineering & Consultancy provides a wide range of engineering services, including civil, telecommunications, and structural engineering. We specialize in ICT procurement, network setup, cyber protection, pen-testing, installation design, maintenance, repair, and faultfinding. Our team also offers tender writing, contract checking, feasibility studies, and security consultancy. Also supply electronic machinery and equipment for various Industries.

For more information about the Company, please visit our website: [www.abrialle.com](http://www.abrialle.com) .

## Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy - The **recruitment and selection policy** plays a crucial role in preventing modern slavery within our organization. Here are key measures:
  1. **Responsible Recruitment**: The policy emphasizes responsible recruitment practices. It ensures that workers are not exploited by unscrupulous recruitment agencies or labor brokers<sup>1</sup>.
  2. **Human Rights Due Diligence**: Companies conduct human rights due diligence assessments of recruitment procedures. This includes evaluating recruitment agencies for any adverse human rights impacts and addressing recruitment costs and fees<sup>1</sup>.
  3. **Supplier Code of Conduct**: Organizations adopt a Supplier Code of Conduct based on international standards. These standards apply to all workers, including permanent, temporary, agency, and migrant workers. The code prohibits any form of forced or involuntary labor<sup>1</sup>.
  4. **Transparency and Information**: Workers are informed of the basic terms of their employment before leaving their home country. This transparency ensures they understand their rights and conditions<sup>1</sup>.

5. **No Worker Pays for Their Job**: The policy commits to ensuring that workers do not pay for their job or the right to work. This prevents debt bondage and exploitation<sup>1</sup>.

6. **Control of Travel Documents**: Workers retain control of their travel documents, preventing situations where employers hold these documents as leverage<sup>1</sup>.

7. **Inappropriate Conduct Reporting**: The policy includes a process for employees to report inappropriate conduct, ensuring accountability and addressing any issues promptly.

By implementing these measures, our organization aims to create a fair and ethical recruitment process that safeguards against modern slavery and exploitation.

- **Supplier code of conduct** - The **Supplier Code of Conduct** is a critical tool in preventing modern slavery within organizations. Here are key measures typically included in such codes:

1. **Zero Tolerance**: The code explicitly states a **zero-tolerance policy** toward modern slavery, child labor, forced labor, and human trafficking. It ensures that suppliers understand the severity of these violations.

2. **Human Rights Commitment**: Suppliers are required to **respect human rights** and adhere to international standards, such as the **United Nations Declaration of Human Rights**. This commitment extends to all workers, including temporary, agency, and migrant workers.

3. **Prohibition of Forced Labor**: The code prohibits the use of **underage children**, forced labor, slave labor, prison labor, and bonded labor. It also bans any form of physical punishment or abuse.

4. **Worker Empowerment**: Suppliers must uphold workers' rights, including **freedom of association**, freedom to terminate employment, and freedom of movement. They cannot engage in violence, harassment, or intimidation.

5. **Ethical Recruitment**: Suppliers are **forbidden from charging workers recruitment fees**. They must ensure that workers do not pay for their job or the right to work.

6. **Supply Chain Responsibility**: The code extends to the entire **global supply chain**. Suppliers are expected to cascade these principles to their subcontractors and sub-suppliers.

By adhering to these standards, organizations aim to create an ethical supply chain that actively prevents modern slavery and upholds human rights.

- **Whistleblowing policy** - **Whistleblowing policies** play a crucial role in preventing modern slavery within organizations. Here's how they contribute:

1. **Encouraging Reporting**: Whistleblowing policies create a safe environment for employees, suppliers, and other stakeholders to **report suspicions or incidents** related to modern slavery. By encouraging reporting, these policies help uncover hidden abuses.

2. **Early Detection**: When individuals report concerns, organizations can **detect modern slavery early**. Timely intervention prevents further harm and allows for corrective action.

3. **Accountability**: Whistleblowing policies hold individuals accountable. They ensure that those involved in modern slavery, whether directly or indirectly, face **consequences** for their actions.

4. **Transparency**: By promoting transparency, these policies signal an organization's commitment to **ethical behavior**. This transparency deters potential wrongdoers and fosters a culture of integrity.

5. **Legal Compliance**: Organizations subject to legal requirements, such as the **Modern Slavery Act**, must demonstrate their efforts to prevent slavery. Whistleblowing policies help meet these obligations.

Remember, effective whistleblowing policies protect both employees and the organization, contributing to a more ethical and responsible business environment<sup>235</sup>.

- Staff code of conduct - **The staff code of conduct** plays a crucial role in preventing modern slavery within organizations. Here's how it contributes:
  1. **Policy Commitment**: The code of conduct explicitly states the organization's commitment to **eradicating modern slavery**. It sets the tone for ethical behavior and emphasizes zero tolerance for any form of exploitation.
  2. **Human Rights Protection**: The code ensures that employees and stakeholders are aware of their rights and responsibilities. It prohibits practices like **child labor, forced labor, and human trafficking**.
  3. **Supply Chain Responsibility**: The code extends beyond internal staff to include **vendors and suppliers**. It holds them accountable for adhering to human rights standards and preventing slavery in their operations.
  4. **Transparency and Reporting**: The code encourages transparency by requiring employees to report any suspicions or incidents related to modern slavery. Reporting mechanisms ensure early detection and intervention.
  5. **Legal Compliance**: Organizations often align their code of conduct with legal requirements, such as the **Modern Slavery Act**. By doing so, they demonstrate their commitment to preventing slavery.

Remember, a robust staff code of conduct fosters a culture of integrity, accountability, and respect for human rights<sup>13</sup>.

- Procurement policy - **Procurement policies** play a crucial role in preventing modern slavery within organizations. Here's how they contribute:
  1. **Exclusion Criteria**: Procurement policies often include **exclusion criteria** that prevent engaging with suppliers involved in modern slavery practices. These criteria ensure that companies do not inadvertently support unethical suppliers.
  2. **Selection Criteria**: Organizations evaluate potential suppliers based on their commitment to ethical practices. **Supplier selection criteria** may prioritize those who demonstrate transparency, fair labor practices, and compliance with anti-slavery regulations.
  3. **Contract Performance Clauses**: Procurement policies incorporate **contract clauses** that hold suppliers accountable for adhering to anti-slavery standards. These clauses outline expectations and consequences for non-compliance.
  4. **Due Diligence and Risk Assessment**: Policies emphasize **due diligence** by assessing supply chain risks. Organizations identify high-risk areas and take preventive measures to avoid modern slavery.
  5. **Collaboration and Reporting**: Effective procurement policies encourage collaboration among stakeholders. Regular reporting mechanisms ensure transparency and early detection of any issues.

Remember, robust procurement policies contribute significantly to eradicating modern slavery in supply chains<sup>1</sup>.

- Safeguarding policy - **Preventing Modern Slavery: Safeguarding Policies and Practices**

Modern slavery is a grave violation of human rights, and safeguarding policies play a crucial role in preventing its occurrence. Here are key ways in which safeguarding policies seek to prevent modern slavery:

1. **Empowerment and Inclusion**:

- **Empowering Vulnerable Groups**: Safeguarding policies focus on empowering vulnerable individuals, including survivors of modern slavery. By involving them in decision-making processes, policies ensure their voices are heard and their needs addressed<sup>1</sup>.
- **Non-Tokenistic Engagement**: Policies emphasize meaningful involvement, avoiding tokenism. Survivors' experiences and insights are valued, leading to more effective prevention strategies.

## 2. **Trauma-Informed Approaches**:

- **Understanding Trauma**: Safeguarding policies recognize that survivors often experience trauma. They promote trauma-informed practices, ensuring sensitivity and compassion in interactions.
- **Creating Safe Spaces**: Policies establish safe environments for sharing experiences, insights, and expertise. Clear communication about boundaries, consent, confidentiality, and available support builds trust<sup>1</sup>.

## 3. **Knowledge Sharing and Collaboration**:

- **Co-Production**: Policies encourage collaboration between survivors, practitioners, and policymakers. Co-production of knowledge ensures research aligns with the needs and interests of those with lived experience.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits.
- Checking certain suppliers with external third parties for any slavery or human trafficking risks.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

## **Risk and Compliance**

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Creating an annual risk profile for key suppliers.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because As most of the people in this sector are knowledgeable and are well educated.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

## **Effectiveness**

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 3 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 50% of suppliers each year.

## Training Staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

## Next Steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- **\*\*Next Steps to Tackle Modern Slavery\*\***

Addressing modern slavery requires concerted efforts across various domains. Here are critical next steps:

1. **\*\*Legislation and Enforcement\*\***:

- **\*\*Strengthen Laws\*\***: Governments must enact robust anti-slavery legislation, defining offenses, penalties, and victim protection.
- **\*\*Effective Enforcement\*\***: Law enforcement agencies should actively investigate and prosecute cases, ensuring accountability.

2. **\*\*Awareness and Education\*\***:

- **\*\*Public Awareness Campaigns\*\***: Raise awareness about modern slavery's forms, signs, and impact. Educate communities, businesses, and schools.
- **\*\*Training for Frontline Workers\*\***: Equip professionals (e.g., healthcare, law enforcement) with tools to identify and respond to victims.

3. **\*\*Corporate Responsibility\*\***:

- **\*\*Supply Chain Transparency\*\***: Businesses must scrutinize supply chains, ensuring no forced labor or exploitation.
- **\*\*Certifications and Audits\*\***: Encourage companies to adopt ethical practices and undergo regular audits.

The statement was approved by the board of directors.

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Date