

AV EVENTS (READING) LIMITED

Modern Slavery and Human Trafficking Policy

Company number: 10709372

Policy owner: Liam O'Brien, Director

Effective date: September 2026

Review date: September 2027

1. Purpose and commitment

AV EVENTS (READING) LIMITED ("AV Events") is committed to conducting its business ethically and responsibly and to preventing modern slavery, human trafficking, forced labour, bonded labour and other forms of labour exploitation within its own operations and supply chains.

AV Events has zero tolerance for modern slavery or human trafficking. We expect the same standards from the freelancers, subcontractors and suppliers with whom we work.

This policy establishes a proportionate framework for identifying, assessing and managing modern slavery risks appropriate to the size and activities of AV Events.

To date, AV Events has not identified any instance or credible allegation of modern slavery or human trafficking within its own operations or supply chain.

2. Organisation, structure, business and supply chains

AV Events is a UK-based audiovisual and live-events production company. The company has fewer than five permanent employees and supplements its permanent workforce with a significant number of freelance technical personnel according to the requirements of individual events and projects.

AV Events also engages subcontractors. Transport and crewing services are regularly subcontracted, with other specialist services subcontracted where required for particular productions.

Our principal supply chains include:

- professional audiovisual, lighting, video, audio and IT equipment;
- LED display equipment;
- cables, accessories, consumables and associated electronic products;
- event production equipment and specialist services;
- freelance technical personnel and crewing providers; and
- transport and logistics providers.

The majority of equipment and consumables are purchased through established UK distributors and suppliers. Certain specialist equipment, principally LED display panels, is purchased directly from a manufacturer in China.

Other potentially higher-risk manufactured goods, including clothing and similar products, are sourced through UK suppliers rather than directly from overseas manufacturers.

3. Employment and engagement of workers

AV Events complies with applicable UK employment and right-to-work legislation.

The identity and right-to-work status of permanent employees are verified. AV Events does not currently use recruitment agencies to employ permanent staff.

All permanent employees are paid above the applicable statutory National Minimum Wage or National Living Wage. At the date of adoption of this policy, AV Events' permanent employees are also paid above the independently calculated Real Living Wage.

AV Events makes extensive use of freelance technical personnel. Freelancers are commonly people already known professionally to the company or individuals who have approached AV Events directly. AV Events requests CV and reference information when engaging freelancers.

Where freelancers are engaged through LifeForce, right-to-work and Public Liability Insurance checks are managed through that system. Relevant records are retained within LifeForce, while CV information is retained within AV Events' business records.

AV Events will not knowingly engage any person through forced, compulsory or trafficked labour and will not knowingly work with organisations using such practices.

4. Modern slavery risk assessment

AV Events recognises that the level of modern slavery risk varies across its activities and supply chains. It therefore applies a proportionate, risk-based approach rather than treating every supplier or engagement as presenting the same level of risk.

Areas identified as warranting particular attention include:

- **direct overseas manufacturing**, particularly electronics manufactured in countries or sectors where labour practices may be less transparent;
- **electronics supply chains**, which may contain multiple tiers between raw materials, component manufacture, assembly and the finished product;
- **freelance and subcontracted labour**, particularly where workers are supplied through third parties;
- **crewing services**, where AV Events may not have a direct contractual relationship with every individual worker; and
- **transport and logistics**, particularly where services involve further subcontracting.

The purchase of LED display panels directly from a Chinese manufacturer has therefore been identified as an area requiring a higher level of supply-chain consideration than routine purchases from established UK distributors.

Risk assessment will be proportionate to the nature, location, value and circumstances of the goods or services being procured.

5. Supplier and subcontractor due diligence

AV Events is introducing a proportionate modern slavery due-diligence process as part of this policy.

Routine purchases from established UK distributors and the routine engagement of known professional freelancers will not normally require individual modern slavery assessments unless there is a specific reason for concern.

For new or higher-risk suppliers and subcontractors, AV Events will consider factors including:

- the country and sector in which goods are manufactured or services provided;
- whether workers are employed directly or supplied through intermediaries;
- the use of subcontracted labour;
- the supplier's own modern slavery, ethical sourcing or labour standards policies where available;
- any credible concerns relating to labour or human-rights practices; and
- the degree of transparency available concerning the relevant supply chain.

Where a supplier is considered to present an increased risk, AV Events may request further information or assurances concerning employment practices, working conditions, ethical sourcing or modern slavery controls.

This enhanced approach will be applied, where appropriate, to direct overseas manufacturing suppliers, including AV Events' direct supplier of LED display panels.

AV Events does not intend this process to create unnecessary administrative barriers to normal business. Due diligence will be targeted according to risk and proportionate to the size and nature of the company and the transaction concerned.

6. Responding to concerns

Employees, freelancers and subcontractors are encouraged to report any concern or suspicion relating to modern slavery, human trafficking or labour exploitation.

Concerns may be raised with:

- the Director; or
- the Site Manager responsible for the relevant event or project.

A Site Manager receiving such a concern must escalate it to the Director.

Concerns raised genuinely and in good faith will be taken seriously and the person raising the concern will not be subjected to detrimental treatment for doing so.

Where a credible concern is identified, AV Events will investigate the circumstances and take action proportionate to the seriousness of the issue. This may include seeking information or assurances from a supplier or subcontractor, requiring corrective action, suspending further engagement or terminating the commercial relationship.

Where AV Events has reasonable grounds to suspect criminal activity or that an individual may be at immediate risk, the matter will be referred to the appropriate authorities.

7. Training and awareness

AV Events recognises that effective modern slavery risk management depends upon the people making purchasing, staffing and operational decisions being able to recognise potential warning signs.

Following adoption of this policy, appropriate modern slavery awareness guidance will be provided to the Director and to personnel whose responsibilities include engaging freelancers, selecting subcontractors, purchasing from higher-risk suppliers or managing personnel on site.

This guidance will include awareness of potential indicators of exploitation and the procedure for reporting and escalating concerns.

The extent and form of training will remain proportionate to the size of AV Events and the responsibilities of the individuals concerned.

8. Monitoring effectiveness

AV Events will monitor the effectiveness of this policy using practical measures appropriate to the scale of the company.

These will include:

- maintaining right-to-work checks for permanent employees;
- continuing appropriate checks and record keeping for freelancers;
- identifying new suppliers or subcontractors presenting an elevated modern slavery risk;
- completing appropriate due diligence for suppliers identified as higher risk;
- recording and investigating any modern slavery or labour exploitation concerns raised;
- recording any corrective action resulting from such concerns; and
- ensuring relevant personnel receive appropriate modern slavery awareness guidance.

The Director will review these measures as part of the annual policy review.

AV Events does not consider the absence of reported incidents alone to demonstrate that no risk exists. The purpose of monitoring is to ensure that appropriate checks are taking place and that potential concerns can be recognised, reported and acted upon.

9. Continuous improvement

AV Events recognises that modern slavery risk management is an ongoing process.

As the business, workforce and supply chains develop, AV Events will review whether additional controls are appropriate. Particular attention will be given to changes involving direct overseas sourcing, labour providers, subcontracted crewing and logistics services.

Where shortcomings are identified, AV Events will seek proportionate improvements rather than relying solely upon termination of a supplier relationship where remediation is possible and appropriate.

10. Responsibility and review

Overall responsibility for this policy rests with **Liam O'Brien, Director of AV EVENTS (READING) LIMITED.**

The Director is responsible for ensuring that the policy is implemented, that identified higher-risk relationships receive appropriate consideration, that concerns are investigated and that the policy remains appropriate to the company's operations.

This policy will be reviewed at least annually and earlier where there is a material change to AV Events' activities, workforce or supply chains, or where an incident or identified risk indicates that a review is necessary.

Approval

This Modern Slavery and Human Trafficking Policy has been approved on behalf of AV EVENTS (READING) LIMITED.

Signed: _____

Liam O'Brien
Director

Date: _____