MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Financial Year Ended 31 March 2026

Aveiroe Europe LLP

Responsible business, grounded in integrity, respect and accountability.

1. Introduction

This Modern Slavery & Human Trafficking Statement is made by Aveiroe Europe LLP ("Aveiroe") in accordance with Section 54 of the UK Modern Slavery Act 2015. It sets out the steps taken during the financial year ended 31 March 2026 to prevent modern slavery, human trafficking, forced labour, and related abuses within our business and supply chains.

Aveiroe is committed to acting ethically, with integrity, and with a strong focus on good governance and responsible business practices.

2. Our Business

Aveiroe Europe LLP is a professional services organisation specialising in:

- Recovery Audit
- Profit Protection
- Compliance & Contract Audit
- Faculty Programmes (training, workshops, and advisory)
- Analytics and commercial assurance services

We work with organisations across the UK and Europe, supporting clients in strengthening financial and operational controls while improving profitability.

Aveiroe operates through a small, experienced team supported by selective subcontractors and professional service providers.

Our operations are low-risk for modern slavery due to the nature of our work (knowledge-based, non-manufacturing, office-based), but we remain vigilant and committed to preventing exploitation.

3. Our Supply Chain

Our supply chain is relatively simple and primarily includes:

- Software and IT service providers
- Professional service and consulting partners
- Recruitment and screening providers
- Facilities, office, and equipment suppliers
- Occasional travel, accommodation, and venue providers for engagements

Most suppliers operate in sectors classified as lower-risk for modern slavery. However, we recognise that risk can exist anywhere, particularly in:

- IT equipment manufacturing
- Hospitality and travel services
- Recruitment services
- Office consumables manufactured overseas

We remain attentive to these areas in our due diligence processes.

4. Our Commitment & Zero-Tolerance Approach

Aveiroe does not tolerate any form of:

- Modern slavery
- Human trafficking
- Forced labour
- Child labour
- Debt bondage
- Exploitation of vulnerable individuals

We expect the same of all subcontractors, partners, and suppliers. Any breach of this principle may result in termination of relationships and reporting to relevant authorities.

5. Policies Supporting Our Approach

Aveiroe has implemented policies and internal expectations that embed ethical conduct into our operations. These include:

5.1 Code of Conduct

Sets out ethical expectations for all team members, including integrity, respect, and responsible business behaviour.

5.2 Supplier Standards & Ethical Expectations

All suppliers must comply with relevant laws and operate in a manner that respects human rights and labour rights. New suppliers are asked to confirm their compliance as part of onboarding.

5.3 Recruitment & Employment Practices

- Right-to-work checks for all those working on behalf of Aveiroe
- Background verification for relevant roles
- No use of zero-hours practices that could create vulnerability
- Fair and transparent compensation aligned with industry norms

5.4 Whistleblowing & Speak-Up Mechanism

Those working on behalf of Aveiroe, including subcontractors, can confidentially raise concerns about unethical conduct, including modern slavery risks. Aveiroe ensures non-retaliation and appropriate investigation.

6. Due Diligence Processes

We conduct proportionate and risk-based due diligence for suppliers and individuals we engage. This includes:

6.1 Supplier Screening

- Verification of legal status and legitimacy
- Assessment of ethical and labour-related policies where relevant
- Checks for high-risk jurisdictions or sectors
- Requirements for compliance with modern slavery laws

6.2 Contractual Safeguards

Supplier and partner agreements include:

- Compliance clauses with UK Modern Slavery Act
- Expectations around labour rights and ethical conduct
- Rights to request information or terminate relationships for breaches

6.3 Ongoing Monitoring

We maintain informal but active monitoring via:

- Annual supplier reviews
- Assessment of new operational risks
- Review of external advisories or sector changes

Should red flags arise, escalation and follow-up processes are in place.

7. Training & Awareness

To ensure vigilance across the organisation:

- Modern slavery awareness is included in relevant onboarding processes.
- Periodic briefings remind those working on behalf of Aveiroe of risk indicators and reporting routes.
- Individuals involved in procurement and supplier engagement receive enhanced guidance on spotting potential issues.

As Aveiroe grows, we will expand structured training materials and frequency.

8. Risk Assessment

We review risks annually, considering:

- Types of services provided
- Nature and location of suppliers
- Any changes to our business model
- Evolving industry or regulatory concerns

Aveiroe has identified its overall exposure as low, but specific attention is placed on:

- IT hardware (manufacturing supply chain)
- Travel and hospitality services used for client onsite work
- Any subcontracting arrangements involving temporary workers

We will continue to reassess risk areas each year and update mitigation practices accordingly.

9. Effectiveness & Key Performance Indicators (KPIs)

To measure our progress, Aveiroe monitors:

- Number of suppliers screened or reviewed during the year
- Percentage of relevant individuals receiving modern slavery awareness training
- Number of concerns raised via the speak-up mechanism
- Compliance checks within recruitment and subcontractor onboarding

For the financial year ended 31 March 2026:

- No concerns or incidents of modern slavery were identified.
- Modern slavery awareness and responsibilities were communicated across the organisation during the year.
- New suppliers were subject to proportionate due diligence appropriate to the nature and risk of the engagement.

10. Future Actions & Continuous Improvement

Aveiroe will continue to strengthen its approach by:

- Developing enhanced supplier questionnaires for higher-risk categories
- Implementing an annual modern slavery refresher for relevant individuals
- Creating a simple risk register to track supplier categories and risk flags
- Periodically reviewing and updating policies to align with evolving best practices
- Expanding whistleblowing accessibility for partners, clients, and suppliers

11. Approval

This Modern Slavery & Human Trafficking Statement has been approved by the Members of Aveiroe Europe LLP and is signed on their behalf by the Designated Member.

Approval and document information

Approved by:	**Howard Cosby**
Position:	Designated Member, Aveiroe Europe LLP
Date:	06 July 2026

Document title

Modern Slavery & Human Trafficking Statement

Financial year

2026

Review

Annually and following any material change