

**AVK-COM-PL-019a**  
**Modern Slavery &**  
**Human Trafficking**  
**Statement**

Document Revision History				
Version	Date	Description of Change	Author/Editor	Approved By
1.0	20/05/2026	New Issue	Head of SRB	CPSO

This statement sets out the steps taken by AVK Power Solutions and its group companies during the financial year April 2025 to March 2026 to identify, assess and address the risks of modern slavery and human trafficking in our operations and supply chains. It is made in accordance with Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

## 1. Our Organisation

AVK Power Solutions is a UK-based manufacturer and supplier of pre-manufactured power generation equipment, including standby generator sets and containerised power solutions, primarily serving data centre operators and critical power customers across the UK and Europe. This statement covers AVK Power Solutions and its group of companies. Our annual group turnover falls within the £100m–£500m range, meeting the threshold for mandatory reporting under Section 54 of the Modern Slavery Act 2015.

Our supply chain largely comprises suppliers from within the UK and Europe, spanning manufacturers of generators, enclosures, electrical components, fuel systems and associated services.

## 2. Policies

AVK operates a zero-tolerance approach to modern slavery in all its forms. Our governance framework includes:

- AVK-COM-PL-019 Modern Slavery & Human Trafficking Policy, signed by the CEO, which sets out our zero-tolerance position and compliance obligations for all employees, contractors, suppliers and business partners.
- AVK-COM-PL-036 Responsible Sourcing Policy, which establishes minimum standards for ethical procurement and requires suppliers to uphold accepted modern slavery and human rights practices.
- Supplier Code of Conduct, incorporated into all supplier relationships, covering prohibitions on forced labour, child labour, discrimination and harassment, and affirming workers rights to freedom of movement, association and access to remedy.
- Whistleblowing Policy, providing an anonymous reporting channel for employees, contractors and supply chain workers to raise concerns about suspected exploitation or ethical breaches.

## 3. Due Diligence

All new suppliers are required to complete the AVK-SCM-FM-001 Supplier & Subcontractor Evaluation Form prior to engagement. This self-assessment covers modern slavery policy, labour practices, anti-discrimination and harassment controls. Where gaps are identified, AVK aims to support suppliers, including where relevant with modern slavery policies and procedures. Failure to comply or continuously improve may result in suspension or termination of the supplier relationship. Modern slavery obligations are also being embedded into framework agreements with key suppliers.

During FY25/26, AVK issued a targeted communication to its supply base setting out minimum requirements on modern slavery and human rights as part of our broader Supplier Engagement approach.

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AVK is also a member of Sedex (Supplier Ethical Data Exchange), a global platform enabling businesses to collect and act on supply chain working conditions data covering labour rights, health and safety, environment and business ethics. As a priority over the coming year, AVK is endeavoring to engage with strategic and high-risk suppliers, and where necessary, conduct 3<sup>rd</sup> party audits to reduce ESG risk in the supply chain.

## 4. Risk Assessment

AVK conducts an annual supply chain risk review as part of its ongoing modern slavery program. Risk assessment considers geography, supplier tier, spend category and materials being purchased.

The primary risk identified is at micro, small and medium-sized businesses as well as categories with a large labour component (e.g. cleaning and construction). Onboarding assessment data identified a proportion of SMME suppliers with gaps in labour policy documentation at the point of initial engagement. This is a strong focus of our remediation activity, through the support and gap-closure process described above. The majority of suppliers are located in either the UK or EU where labour standards and enforcement are higher.

No indicators of forced labour were identified in AVK’s own operations or supply chain during the reporting period. No incidents of modern slavery were reported through whistleblowing channels.

## 5. Training and Awareness

Awareness of AVK’s zero-tolerance approach to modern slavery is embedded in the employee induction process, ensuring all new joiners understand their responsibilities and reporting obligations. A supplier-facing awareness communication was also issued during FY2025/26.

The Supply Chain team has also been engaged to increase awareness of modern slavery. AVK is committed to delivering a formal staff training program in FY26/27.

## 6. Key Performance Indicators

Metric	Status / Result
Suppliers onboarded via AVK-SCM-FM-001 Supplier & Subcontractor Evaluation Form	~600
SMME suppliers with gaps in basic labour policies at onboarding	Approx. 30%
Modern slavery incidents reported (own operations)	0
Whistleblowing reports received	0
Supplier awareness communication issued	Completed FY2025/26
Sedex supplier onboarding	In progress
Formal staff modern slavery training	Targeted for FY2026/27

# Modern Slavery & Human Trafficking Statement



Signed:

A handwritten signature in blue ink, which appears to read 'Ben Pritchard'.

Ben Pritchard  
CEO (Signed May 2026)  
On behalf of the AVK Senior Leadership Team

*This statement will be reviewed and updated annually. Previous statements are available on the AVK-SEG website.*

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