

Modern Slavery Statement

Overview

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) and applies to Avrame UK Ltd and Avrame LLC. It sets out the steps taken, is continuing to take and intends to take to ensure that modern slavery or human trafficking is not taking place within its business and supply chain. Avrame LLC and Avrame UK Ltd fully supports the objective of the Act, which requires businesses to set out what steps have been taken in the financial year to ensure modern slavery is not occurring in their supply chain and in their own organisation.

This statement refers to the financial year ending 31st March 2024.

Organisational Structure and Supply Chains

Avrame LLC and its representative to the UK - Avrame UK Ltd are both privately-owned international providers of highly energy efficient, innovative, pre-fabricated, structural framing systems for A-frame and classic design houses. We are dedicated to creating unique and sustainable homes that are both affordable and environmentally friendly.

We have a total of 12 A-frame building kits and 5 classic models, which range from small storage sheds or studios to multi-room single-family homes. Each one includes all of the lumber, roof and flooring structures, windows, doors, and building accessories necessary for a given structure, as well as blueprints and building components required to construct it on a properly-prepared foundation.

All structural components are pre-cut, marked with detail numbers, and ready to assemble on-site. The homeowner is responsible for preparing the building site and foundation, hiring a contractor or gathering an assembly team and sourcing/installing any mechanical components, including HVAC.

Each business entity is controlled by a Managing Director and employs over 10 people.

Avrame has successfully delivered facilities to clients Internationally with main business operations in Europe, the UK, Canada, Africa, Australia and the USA. We have established key partnerships and alliances with suppliers, providers and service partners – all chosen because they actively contribute to a key aspect of our operations. We develop long term relationships with these key partners and avoid making demands that might lead to them violating human rights.

Policies

Avrame acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Avrame understands that this requires an ongoing review of both its internal practices in relation to its labour force and additionally, its supply chains.

Avrame operate a Whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Business is conducted in an honest and ethical manner. Our Anti-Bribery & Corruption Policy details our zero-tolerance approach to bribery and corruption and our commitment to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption. This policy applies to all individuals working for or on behalf of Avrame in any capacity.

Supply Chain Management

In order to fulfil its activities, the main supply chain partners of Avrame UK Ltd are situated in both Estonia and the UK.

We have implemented a risk-based approach to identify, prevent, mitigate and account for how Avrame addresses threats of modern slavery and human trafficking. Our standard T&Cs reflect our policies and we have taken steps to assess the actual and potential human rights impacts by conducting due diligence on a sample of our direct suppliers. These suppliers have completed a survey to understand the risk of modern slavery in their supply chain and actions they are taking to address this risk. The results of the survey did not give rise to any concerns to compliance with the Act.

We have a strong culture of process improvement. The assessment and compliance of new suppliers is reviewed as part of the onboarding process to ensure we only engage with appropriate suppliers.

Exposure to slavery and human trafficking.

We have considered the risk of Avrame LLC and Avrame UK Ltd being exposed to slavery and human trafficking, taking into account:

- The highly skilled nature of roles and activities undertaken within Avrame and the competencies required to perform them;
- The application of our policies, including whistleblowing and anti-bribery & corruption; and

- That our supply chain operations are substantially based in Estonia and the UK.

As a result of the factors above and, as noted elsewhere in this statement, we deem the risk of slavery or human trafficking occurring within our business to be relatively limited.

Training and Awareness

Our people play a key role in mitigating risk within our business and supply chains, and we recognise that appropriate and targeted training is essential. During the induction process new starters receive training and education on Modern Slavery and Avrame policies. Ongoing training for the Senior Management Team is provided on specific basis as part of their continual professional development.

Governance

Avrame LLC and Avrame UK Ltd shall take responsibility for this statement. The statement will be reviewed and updated as appropriate.

This statement was signed by the Managing Director of Avrame LLC on 20 of September 2023 and

by the Managing Director of Avrame UK Ltd on 22nd of June 2024

Indrek Kuldkepp
CEO of Avrame LLC
20th September 2023

Kristina Georgieva-Jones
Managing Director of Avrame UK Ltd
22nd of June 2024