

Anti Slavery and Human Trafficking Policy

It is our policy that the Partners and all employed by, or at Architon LLP are compliant with the UK's Anti Slavery and Human Trafficking legislation; as such adherence to this policy is mandatory for all. If anyone fails for any reason to follow this Policy, it may result in disciplinary action being taken against that person which could result in their dismissal.

No one is to engage in activities which are contrary to UK Anti Slavery and Human Trafficking legislation, anyone doing so could face up a prison sentence and/or fine, whilst Architon LLP could also be liable to an unlimited fine and Government sanction. This policy document is not regarded as exhaustive, but does give examples of situations, whilst setting out the rules and procedures to be followed. If anyone is at any time uncertain as to whether their actions will comply with this policy, guidance must be sought from the Partners of Architon.

The UK's Anti Slavery and Human Trafficking legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

This policy uses the following definitions: -

- Modern slavery encompasses slavery, servitude, human trafficking and forced labour.
 Architon LLP has a zero tolerance approach to any form of modern slavery.

 We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.
- Supply Chain are those suppliers and subcontractors who are in the direct employ of Architon.

At all times the Partners and those employed by, or at, Architon LLP shall act in accordance with the following:-

- Not engage in Modern Slavery.
- Not engage in Human Trafficking.
- Operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- All employees are to raise concerns to the Architon Partners about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Confidentially report all incidents, risks and issues which are contrary to this policy document to the Partners.
- Raise any issues regarding Anti Slavery and Human Trafficking laws and Architon's Practice Systems and Policies. Queries will be dealt with anonymously and a written response will be issued.

- Hold the Architon Supply chain to account over modern slavery and Human Trafficking.
- Pay their employees at least the national minimum wage / living wage.
- Pay their employees any prevailing minimum wage applicable within their country of operations.
- Termination of any direct or supply chain contract, should any instances of modern slavery or human trafficking come to light.

By complying with this policy we aim to ensure that all at Architon LLP will not at any time knowingly breach any relevant Anti Slavery and Human Trafficking legislation. By adhering to the Policy Architon LLP can also demonstrate that it has adequate procedures in place to prevent such activity.

It is mandatory for all employees to read this policy and that all new employees shall read this on their Day 1 induction.

All at Architon LLP have an independent obligation to prevent Modern Day Slavery and Human Trafficking, and to ensure that any interaction with public officials complies with this policy document and relevant laws.

Signed:

C. Davis - Senior Partner For and on behalf of

Architon LLP 23 Feb 2023

