

ARCOLOGY

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Policy statement

- 1.1. At Arcology we acknowledge that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery.
- 1.2. We are committed to acting ethically and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.
- 1.3. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our activities and business relationships. We expect the same high standards from all of our contractors, suppliers and other business partners.
- 1.4. We have adopted this Policy to record our position on modern slavery and human trafficking and the responsibilities of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking.
- 1.5. If you have difficulty understanding any part of this Policy, we encourage you to contact us for assistance.

2. Definitions

- 2.1. **"Arcology"**, **"we"**, **"us"** and **"our"** means Arcology Ltd, a company registered in the United Kingdom with company registration number 15813971 and with its registered address at 71-75 Shelton Street, Covent Garden, London WC2H 9JQ and any of its subsidiaries;
- 2.2. **"Modern Slavery Committee"** means the Chief Operations Officer and Chief Executive Officer from time-to-time;
- 2.3. **"Policy"** means this policy and any amendments made to it from time to time;
- 2.4. **"you"** or **"your"** means the persons recorded in paragraph 3.1 of this Policy and to whom this Policy applies.

3. Application

- 3.1. This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners.
- 3.2. This Policy does not form part of any contract and we may amend it at any time.

4. Responsibility for the Policy

- 4.1. The directors have overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

- 4.2. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given any required training.
- 4.3. The Modern Slavery Committee have day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. The Modern Slavery Committee can be contacted at any time at the following bram@arcology.uk.

5. Your responsibility

- 5.1. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for or with us and/or who are under our control.
- 5.2. You must ensure that you read, understand and comply with this Policy.
- 5.3. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 5.4. If you believe or suspect a breach of this Policy has occurred or that it may occur you must notify the Modern Slavery Committee as soon as possible.
- 5.5. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business at the earliest possible stage.
- 5.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any part of our business as described here constitutes any of the various forms of modern slavery, raise it with the Modern Slavery Committee immediately.
- 5.7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or business relationships.
- 5.8. If you believe that you have suffered any such treatment, you should inform the Modern Slavery Committee immediately.

6. Communication and awareness of the Policy

- 6.1. Training on this Policy and on the risks associated with modern slavery, will form part of the induction process for all individuals who work for us and/or training will be provided as necessary.
- 6.2. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 6.3. We will, as part of our contracting processes, endeavour to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

7. Breaches of this Policy

- 7.1. Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

MODERN SLAVERY POLICY	
Adopted by Company on:	01/07/2024
Change history:	V.1
Version No.:	V.1
Version approved by:	Bram De Buyser on 01/07/2024
Frequency of review	At least every 12 months