

### Modern Anti-Slavery Statement

Atheneum Partners GmbH maintains relationships with many different businesses, as well as employing people directly. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, Atheneum Partners has adopted a policy on the prevention of modern slavery and human trafficking. This policy governs all our business dealings and the conduct of all persons or organisations with whom we contract directly. We expect all who have, or seek to have, a business relationship with Atheneum Partners and/or any member of our company, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery policy.

#### **1. Our statement**

Atheneum Partners operates to a set of five values which reflect how we behave: Sustainability, Entrepreneurship, Excellence, Diversity and Supportive Spirit. With particular reference to the Modern Slavery Act 2015, these values, and our work with vulnerable people, often victims of sexual exploitation, ensure that we remain committed to opposing modern slavery and preventing it by whatever means we can. Our attitude to modern slavery is: zero tolerance.

#### **2. Purpose of the policy**

2.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of Atheneum Partners (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

2.2 As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all 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 own businesses or those of our clients.

#### **3. Steps for prevention of slavery**

3.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. We expect our clients to follow the same high standards.

#### **4. Responsibility for the policy**

4.1 Ultimate responsibility for the prevention of modern slavery rests with the partners of the company. Partners have overall responsibility for ensuring compliance with our legal and ethical obligations.

4.2 However, Principals and Account Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate guidance on the issue of modern slavery.



### 5. Suspicious activity

5.1 The company must be made aware immediately of any suspicious activity through reporting to Timur Mansuraliev (Director of Compliance).

Employees or any other person wishing to raise a concern should call Director of Compliance in any of the following circumstances:-

- You suspect a person acting on behalf of Atheneum is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our clients is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of Atheneum, who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of Atheneum or the client is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

The source of reports will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed.

### 6. Direct communication

Atheneum encourages members of the public or people not employed by us to write, in confidence to Director of Compliance, to raise any concern, issue, or suspicion of modern slavery in any part of our business. Please send any such email to [compliance@atheneum-partners.com](mailto:compliance@atheneum-partners.com).

### 7. Safeguards

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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

### 8. Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed on a regular basis and may be amended from time to time. This policy will be used to inform our Statement on Slavery and Human Trafficking.

