

TWELVE ARCHITECTS – MODERN SLAVERY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, 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. Twelve Architects maintains a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all our business dealings, and to implementing and enforcing effective systems and controls to safeguard against modern slavery in our operations and supply chain consistent with our disclosure obligations under the Modern Slavery Act 2015.

OUR BUSINESS

Twelve Architects is a chartered architectural practice delivering distinctive and memorable designs for projects in the UK and internationally. We have extensive experience across a wide range of sectors, including education, research, office, residential, transport, culture, leisure, retail, healthcare and masterplanning.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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 and business partners.

OUR POLICIES

We have a range of internal policies in place to help ensure that we operate ethically and transparently:

- **Equality & Diversity Policy:** We are committed to providing an inclusive and supportive working environment free from discrimination, exploitation or unfair treatment.
- **Business Ethics & Conduct Policy:** This outlines how we expect all employees and suppliers to conduct themselves, with integrity and respect for ethical practices, including zero tolerance for modern slavery.

OUR SUPPLY CHAINS

We operate a preferred supplier list and conduct due diligence on all suppliers before approval. This includes checks to ensure that suppliers have not been convicted of offences related to modern slavery.

Our anti-slavery principles are incorporated into our supplier contracts, and suppliers must confirm that they comply with these standards.

As part of our supplier contracts, we require confirmation that:

- They have effective measures in place to prevent modern slavery within their operations.
- They hold their own suppliers and subcontractors accountable to the same standards.
- They pay their employees at least the national minimum or living wage, as appropriate.
- We reserve the right to terminate contracts immediately if any instance of modern slavery is identified.
- Compliance with the policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify a Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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 in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

COMMUNICATION AND AWARENESS OF THIS POLICY

Twelve Architects provide regular training to relevant employees, including our procurement and supply chain teams, to help them recognise the signs of modern slavery and understand what action to take if they suspect it may be occurring.

MONITORING EFFECTIVENESS

We monitor the effectiveness of our measures through the following indicator:

- No reports are received from employees, the public or law enforcement agencies indicating that modern slavery practices have been identified within our business or supply chain.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

M. ~~Cartwright~~

Matt Cartwright
Founding Director
April 2026