



## **Architas Multi-Manager Limited**

### **Slavery and Human Trafficking Statement 2019**

This statement is made by **Architas Multi-Manager Limited** (the “**Company**”) pursuant to Section 54 of the UK *Modern Slavery Act 2015* (the “**MSA**”). It sets out the steps that the Company has taken during the 2019 financial year to combat and prevent all forms of modern slavery and human trafficking in its business and supply chains. This statement covers the Company’s direct operations and supply chains.

The AXA Group has a long history of adhering to and promoting strong professional ethics and is committed to conducting its business according to the highest standards of honesty and fairness. This commitment to observing such ethical standards is designed not only to ensure compliance with applicable laws and regulations in the various jurisdictions where AXA operates but also to earning and keeping the continued trust of its clients, shareholders, personnel and business partners. AXA believes that its success and reputation is not only dependant on the quality of its products and the services provided to its clients, but also on the way it does business. This includes a strong commitment to human rights and, therefore, it welcomes the transparency promoted by the MSA.

#### **1 Company’s structure and business**

The Company’s principal activity during 2019 continued to be the operation and the management of investments of regulated collective investment schemes and the provision of investment advisory services to a number of AXA Group companies.

#### **2 Company’s supply chains**

The Company outsources some activity, including but not limited to administration of funds and transfer agent activities.

#### **3 Engagements and policies in relation to modern slavery and human trafficking**

The AXA Group is committed to respecting internationally recognised human rights principles as defined by the United Nations Universal Declaration of Human Rights, the core standards of the International Labour Organisation and the Guiding Principles for the implementation of the United Nations “Protect, Respect and Remedy” Framework (Ruggie Principles).

The AXA Group is also committed to applying international general and sector-specific standards such as the UN Principles for Responsible Investment (“**UN PRI**”), the UN Principles for Sustainable Insurance and the UN Global Compact (“**UN GC**”). Since 2003, AXA adheres to the UN GC and has formally committed to promoting its ten guiding principles, including those on human rights (such as avoiding complicity in human rights abuses and supporting and respecting the protection of internationally proclaimed human rights) and labour standards (such as supporting the elimination of all forms of forced and compulsory labour and the effective abolition of child labour). Since 2018, Architas Limited (the Company’s parent) has become a signatory to the UN PRI.

In addition, the AXA Group has put in place policies to support its commitment to ethical business practices across the organisation. These include:

- **The AXA Group Human Rights Policy**<sup>1</sup>, which aims to ensure that (i) the Group does not cause or contribute to adverse human rights impacts and (ii) such impacts are addressed when they occur. The policy also sets out AXA's commitment to identify, prevent and/or mitigate adverse indirect human rights impacts that are linked to its operations or services, through its business relationships or projects it has invested in or insured.
- **The AXA Group Compliance and Ethics Guide** (the "Guide")<sup>2</sup>, which establishes guiding principles and Group-wide policies designed to ensure that all AXA Group companies and their personnel have a common vision of the Group's ethical standards (including the UN GC principles on human rights, labour standards, environment and anti-corruption) and operate in accordance with those standards. All AXA employees are encouraged to report promptly any practices, actions or conduct that they believe are inappropriate or inconsistent with any of the policies set out in the Guide through their local whistleblowing procedures. Senior officers of AXA entities are asked to submit an annual certification to confirm that they comply with all the provisions set out in the Guide.

The AXA Group Human Rights Policy, the Guide and the principles and standards mentioned above all apply to the Company.

In addition:

- The Company has an outsourcing oversight policy, which describes processes and controls to oversee relationships with third party suppliers.
- Employees of the Company submit an annual certification confirming they comply with all the provisions of policies including the Company Code of Conduct, Compliance Manual and relevant operational procedures.
- The Company has an Outsourcing Committee, which meets quarterly. The purpose of the Committee is to review the Company's adherence to the AXA Group Standards; review the risk and control framework; establish minimum standards for outsourcing; and facilitate compliance with relevant regulatory requirements related to outsourced arrangements.

These policies, and the regulatory framework in which the Company operates, means it adopts a risk-based approach to outsourcing and procurement. In performing these assessments, the Company considers a variety of factors including conduct risk principles and legal risk. Due to the nature of the Company's outsourced activities, and the regulatory framework in which it operates, the Company has a low risk of exposure to modern slavery and human trafficking within both its operations and its supply chains.

#### **4 Management of the modern slavery and human trafficking risk in the Company's operations**

AXA acknowledges its responsibility to respect human rights in its operations and conducts its business in compliance with applicable employment regulations in the jurisdictions in which it operates. The Guide sets out protections for AXA's employees and their rights. In particular, it emphasises that:

- AXA is committed to upholding the right of freedom of association and collective bargaining, as well as maintaining constructive labour management relations in every

---

<sup>1</sup> Available on [www.axa.com](http://www.axa.com).

<sup>2</sup> Available on [www.axa.com](http://www.axa.com)

country in which it does business, and to do so with due respect for different national approaches to social dialogue.

- AXA respects the rights of its employees to enjoy just and favourable conditions of work, including health and safety protections, and is committed to providing adequate information and training on health and safety and wellbeing issues.

In addition, AXA promotes diversity and inclusion by prohibiting any form of discrimination between current, past or potential staff on the basis of age, race, nationality, ethnic origin, gender, sexual orientation, religion, marital status or disability.

## **5 Assessment of the Company's largest suppliers and due diligence process in relation to the Company's supply chains**

The Company ensures its largest suppliers meet standards with respect to ethics and corporate responsibility through a clearly documented process for supplier selection and contracting.

In accordance with such process, the Company's standard contractual terms for its largest suppliers include specific reference to AXA's corporate responsibility requirements, and such suppliers are required to provide a formal commitment to uphold the core standards of the UN GC by signing AXA's "Corporate Responsibility clause". Notably, such suppliers agree to refrain from using, or accepting that their own suppliers and sub-contractors make use of, child labour (under 15 years old) or forced labour.

Detection of a direct or indirect violation by the supplier of the AXA corporate responsibility requirements is discussed directly with the relevant supplier with a view to establishing a mutually agreed and documented corrective action plan. Where any issue is not resolved satisfactorily, the Company reserves the contractual right to end its relationship with the relevant supplier.

In addition, the Company's procurement team seeks to prevent or mitigate adverse human rights impacts of its direct suppliers by the use of a third party tool to monitor and assess a number of corporate responsibility topics (including child and forced labour) for its largest suppliers. This tool enables the Company to detect the supply chain corporate responsibility risks in respect of those suppliers.

## **6 Training**

As at the date of this Statement, in 2017, members of the Company's Quality Assurance Team undertook training in respect to modern slavery in the context of company supply chains.

The Company's Board of Directors approved this statement on 19 May 2020, which constitutes the Company's slavery and human trafficking statement for the financial year ending 2019.



By

\_\_\_\_\_  
**Andy Purvis**

Director – Legal, Compliance and Chief Risk Officer

20 May 2020