

# Modern Slavery Act 2015

## Slavery, servitude and forced or compulsory labour

- (1) A person commits an offence if –
  - (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
  - (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
- (2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.
- (3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.

[...]
- (5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude, or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

## Penalties

- (1) A person guilty of an offence under the sections above is liable –
  - (a) on conviction on indictment, to imprisonment for life;
  - (b) on summary conviction, to imprisonment for a term not exceeding 12 months or a fine or both.

Axis recognizes the Modern Slavery Act 2015, we understand modern slavery risks and ensure that there is no modern slavery in our business and supply chains.

## **Transparency in Supply Chains Clause**

In order to ensure that our Supply Chain recognizes, understands and operates as the Act dictates, they all have to sign a disclosure confirming that Modern Slavery is not happening in the subcontractors' business. We will not knowingly support and work with any business who is involved with slavery and/or human trafficking.

## **Summary of the steps the organisation has taken during the financial year**

In order to promote the act within Axis, we have uploaded our Modern Slavery Act statement in our Company website and Intranet, we have provided employees with this statement in our Inductions and we are currently in the process of arranging tool box talks.

Our employees do not have to work for more than 48 hours a week on average over 17 weeks, including normal working hours and overtime, unless our employee agrees to do so.

## **Responsibility for anti-slavery initiatives**

In relation to our Supply Chain: This falls under Axis' Operations Director, who is ensuring that our Supply Chain abides to the Act. In relation to Axis as a whole, the responsibility lies into various Departments. The HR Department always ensures that all letters and contracts of employment meet the law in relation to working hours and salaries. The Payroll Department ensures that all the employees and third parties are paid in time as per the terms and conditions of their associated contracts, and a detailed payslip is provided to all employees outlining what has been included in the pay. The Operations teams ensure that the employees are aware of the Act and its contents via Tool box talks that offer across Axis and finally the Marketing team provides communication both externally via the company's website and internally via the Intranet.

Axis has a zero tolerance approach to cases of discrimination, bullying and harassment and immediate action will be taken in case of such events.