

Axis – Anti Modern Slavery statement 2024/25

Our organisation:

We understand in the industry we operate we are not immune from the risks of modern slavery and we need ensure that all the people that work for us either employed, subcontractor or part of the supply chain take responsibility to protect the vulnerable.

The services we provide:

We are a contractor operating across the UK delivering a variety of different services which include but not exhaustive, maintenance partnerships with housing associations and local government, planned works, including FRA and cladding and painting and heritage works.

Our People:

We have a large directly employed workforce and also use subcontractors to deliver our service.

We have promoted to all our people that modern slavery is a global problem that affects us all. We have shared examples of how individuals can unwittingly be part of the cycle. We have highlighted that everyone has a vital role to play in tackling the issue and this has mainly been delivered via toolbox talks and via of teams communication channel.

We have updated the face-to-face tool box talks on modern slavery and have created a learning management module to deliver across the business this is adapted as a video link and quiz so all Axis employees watch and listen to the training but also to ensure they have understood the existence of modern slavery and that whatever their role within the business they can help protect vulnerable workers.

We have adapted and repromoted our existing corporate policies to incorporate modern slavery and human trafficking issues.

Our hundred-day induction stream ensures that everyone who is employed with Axis receives the modern slavery training and will have access to review any updates to the information. This training includes modules on Understanding Modern Slavery, Forced Labour Awareness, and what to do if Modern Slavery is suspected. Employees are trained on how to spot risk factors and how to raise a concern.

We work in partnership with a number of our clients who are equally passionate to protect vulnerable workers and we agree with them to:

- Share information, where possible, to help stop or prevent the exploitation of workers
- Work together to manage information sensitively and confidentially
- Commit to raising awareness within the supply chain
- Maintain momentum through communicating regularly

Whistleblowing

We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of Axis. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. All employees are empowered to raise their concerns with managers, and if they wish to remain

confidential, employees follow a Whistleblowing process and can report their concerns to the GLAA directly.

Our supply chains:

Axis supply chain is characterised by skilled technical contractors and trades, there is a use of skilled agency labour where Axis are unable to meet demand or skill set.

We operate a prequalification questionnaire (PQQ) which now runs through a central approval portal before any organisation is able to supply us with goods and/ or services. We are ISO9001 accredited so we continuously monitor and audit our risks in this process.

In order to ensure that our supply chain recognizes, understands and operates as the Act dictates, the PQQ disclosure confirms that our supply chain understand the terms of the Act and that Modern Slavery is not present within their business. We will not knowingly support and approve any business involved with slavery and/or human trafficking and any such occurrence will result in the removal of such an organisation from our supply chain. We have an LMS module on our LMS system.

Agency staff are recruited through companies that have been added to our preferred suppliers list after a selection process and are reviewed by our internal recruiter. Information has been added to our selection process to ensure the agencies understand their responsibilities in relation to the Act.

Supply chain is reviewed continuously with the implementation of our central portal regarding changes in their structure, nature of business.

The future:

As an organisation we are improving our networks with organisations such as the GLAA, human trafficking foundation and people matter charter so we have access to expert knowledge and use best practice to improve working practice around tackling modern slavery/human trafficking.

We have added an anti-slavery day to our responsible business annual communications calendar and will ensure this day will be well communicated within the business through signposts to our training and quizzes, external video links on the why it is important to understand latest trends and methods used by modern slavery perpetrators to take the correct action.

We continue to add new technology to our subcontractor portal and our aim is to provide the same level of information and knowledge sharing on modern slavery to our subcontractor community.

This statement is made on behalf of Axis Europe PLC pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act"), and constitutes our organisations slavery and human trafficking statement for the financial year ending 30TH April 2025.

Maria Northwood

Business Support Director