

MODERN SLAVERY POLICY

For the Financial Year End 31st March 2026

POLICY STATEMENT

The Group, namely Axis CLC understands in the industry we operate we are not immune from the risks of Modern Slavery and we ensure the people that work for us either employed, subcontractor or part of the supply chain take responsibility to protect the vulnerable.

This statement has been approved by the Board of Directors and covers all companies within the group. It is signed by Richard Morris, the Chief Executive Officer of Axis CLC.

COMPANY OVERVIEW

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

The Company operations are in the UK, the success is based on a sustainable business model with many long-term customers, the business is reliant on its workforce and supply chain to ensure quality delivery to the customer. We also employ a subcontract supply chain of varying size according to workload or specialism requirements to deliver our services.

RESPONSIBILITY FOR THE POLICY

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The compliance team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery however ultimate responsibility for the implementation and compliance with this policy firmly remains with the CEO and Board of Directors.

OUR COMMITMENT

We will update our policies and procedures as required to ensure we maintain appropriate safeguards against any mistreatment of persons involved in our supply chain or own internal business.

We are consistent with our disclosure obligations under the Modern Slavery Act 2015 (the Act).

OUR PEOPLE

We have a large directly employed workforce and also use subcontractors to deliver our service throughout the United Kingdom. Our people are aware that modern slavery is a global problem that affects us all and we have shared examples of how individuals can unwittingly be part of the cycle.

We have updated the face-to-face toolbox 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 employees watch and listen to the training.

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

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

SUPPLIER ADHERENCE

Our supply chain is characterised by skilled technical contractors and trades where the Company there is unable to meet demand or skill set. We operate a prequalification questionnaire (PQQ) which now runs through a central approval portal prior to any organisation is able to supply us with goods and/ or services.

We are ISO 9001 accredited, so we continuously monitor and audit our risks in this process. In order to ensure that our supply chain recognises, 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 a Learning Management System (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.

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OUR POLICY IN RELATION TO MODERN SLAVERY

The Group internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We have adapted and repromoted our existing corporate policies to incorporate modern slavery and human trafficking issues

All internal policies are reviewed regularly to ensure they are appropriate, well communicated and promote continued compliance with the Act and other applicable legislation. We have in place the following policies which are relevant to the prevention of slavery and human trafficking in its operations:

Whistleblowing Policy

We encourage all employees, customers and other business partners to report any concerns related to the activities of the business, including any worries in relation to slavery and human trafficking. The Group Whistleblowing policy and procedure are designed to ensure that any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially.

Corporate Social Responsibility Policy

This policy is designed to ensure that the Group of Companies conducts all business responsibly and with the highest ethical and professional standards.

Equality, Diversity Inclusion and Equal Opportunity Policy

We are committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination, harassment and victimisation on the grounds of race, sex, pregnancy, maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

Recruitment Policy

We ensure that the process of recruiting employees is fair, consistent, professional and non-discriminatory to both internal and external candidates.

Modern Day Anti-Slavery Policy

We encourage our employees to consider Anti-Slavery measures when working with potential supply chain members or whilst working in partnership on site. If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, we encourage reporting it using the recommended channels.

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 FUTURE

As an organisation we are improving our networks with organisations such as the Gangmaster and Labour Abuse Authority (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.

Overall, we will continue to focus on understanding further our supply chain, identifying risk areas, and increasing awareness amongst all the employees on the issues of modern slavery and the reporting of procedures available to them. We will continue to update policies and procedures as required to ensure appropriate safeguards against any mistreatment of person are in place.

This statement is made on behalf of the Group pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our organisations slavery and human trafficking.

Signature

Richard Morris

RICHARD MORRIS

CEO

September 2025