MODERN SLAVERY POLICY

1 Policy Statement

1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Axis CLC's slavery and human trafficking statement for the year ending 31 March 2026.

1.2 In this statement slavery and human trafficking is referred to as modern slavery.

1.3 This statement applies to all legal entities that form part of the Axis CLC group of companies.

2 About Axis CLC

2.1 Axis CLC operates across the UK as a contractor delivering a wide range of services including refurbishment, maintenance partnerships with housing associations and local government, planned works, including fire risk assessments, cladding remediation, painting and heritage works.

2.2 The success of the company is based on a sustainable business model with many long-term customers and the business is reliant on its workforce and supply chain to ensure quality delivery to the customer. The company also employs a subcontract supply chain of varying size according to workload or specialism requirements to deliver its services.

2.3 Axis CLC recognises that construction, maintenance and subcontracting activities may present elevated risks of modern slavery, particularly where temporary labour, agency workers and complex supply chains are involved. Risk assessments are conducted to identify and mitigate these risks through supplier due diligence, ongoing monitoring and workforce awareness initiatives.

2.4 Should the Company become aware of concerns in relation to slavery and human trafficking action will act promptly to notify the relevant third parties, such as, the police should someone be in immediate danger or the Modern Slavery and Exploitation Helpline (telephone 08000 121 700) or the Gangmasters and Labour Abuse Authority (0800 432 0804) and also the Company's Client where appropriate.

3 Commitment to the principles of the Modern Slavery Act

3.1 Axis CLC is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

3.2 As an equal opportunities employer the company is committed to creating and ensuring a non-discriminatory and respectful working environment for its workforce. The company wants all its employees and workers to feel confident they can expose wrongdoing without risk to themselves.

3.3 The company's recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

3.4 The company does not knowingly enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. The company's position is one of zero tolerance of modern slavery.

4 The Company Supply Chain

4.1 The Company supply chain is characterised by skilled technical contractors and trades where the company is unable to fulfil all the operational requirements or skills with its direct workforce. The company utilises a prequalification questionnaire (PQQ) which runs through a central approval portal before any organisation is able to supply goods and/ or services to the company.

4.2 The company will not knowingly support or approve any business involved with slavery and/or human trafficking and any such occurrence will result in the removal of such an organisation from the company's supply chain.

4.3 The company is ISO 9001 accredited and continuously monitors and audits its risks in this process.

4.4 In order to ensure that the supply chain recognises, understands and operates as the Act dictates, as part of the PQQ disclosure process subcontractors are required to confirm that they understand the terms of the Modern Slavery Act and that modern slavery is not present in their business.

4.5 The supply chain is reviewed continuously with the implementation of the central portal regarding changes in subcontractors' structure and nature of business.

4.6 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 the selection process to ensure the agencies understand their responsibilities in relation to the Act.

5 Policies in Relation to the Modern Slavery Act

5.1 Axis CLC's internal policies reflect the company's commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the company's supply chains.

5.2 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 modern slavery and human trafficking in its operations and supply chains:

- **Whistleblowing Policy**
  The company encourages 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 Whistleblowing policy and procedure are designed to ensure that any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially.

- **Environmental Social & Governance Policy**
  This policy is designed to ensure that the company conducts all business responsibly and with the highest ethical and professional standards.

- **Equality, Diversity and Inclusion Policy**
  The company is 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.

- **Bullying and Harassment Policy**
  The company is committed to providing a working environment that is safe, healthy, fair and free from bullying and harassment or victimisation where all employees are treated with respect and dignity. This policy provides a mechanism to deal with allegations of bullying and harassment or victimisation in a sensitive, confidential and prompt manner and eliminate unacceptable behaviour.

- **Sexual Harassment Policy**
  All employees are entitled to be treated with respect and dignity and be free of sexual harassment, feel safe and supported and have access to redress if such behaviour occurs. The company is committed to taking reasonable steps to prevent sexual harassment occurring in the workplace and provides clear reporting and investigation procedures to support employees who experience or witness sexual harassment

- **Recruitment Policy**
  The company looks to ensure that the process of recruiting employees is fair, consistent, professional and non- discriminatory to both internal and external candidates.

- **Safeguarding Policy**
  The company considers the safeguarding of children, young people and vulnerable adults to be of paramount importance and is particularly mindful of its responsibilities for safeguarding when carrying out maintenance and responsive repair work.

- **Modern Slavery Policy**
  The company encourages its 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.

6 Training and Awareness

6.1 The company continues to raise employee awareness and provide modern slavery awareness information where appropriate, for example through face-to-face toolbox talks.

6.2 The company has an interactive online training programme about modern slavery which all employees are required to complete as part of their induction on joining the company and at regular intervals to ensure modern slavery awareness is refreshed.

6.3 The company works in partnership with a number of clients who are equally passionate to protect vulnerable workers and together we:

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

7 Responsibility for the Policy

7.1 The Board of Directors has overall responsibility for ensuring this policy complies with the company's legal and ethical obligations and that all those under its control comply with it.

7.2 All managers 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.

8 The Future

8.1 The Company will continue to embed modern slavery awareness through targeted communications, training refreshers and engagement activities aligned to national anti-slavery awareness initiatives.

8.2 The company has incorporated Anti-Slavery Day into its annual responsible business communications programme. Activities will include refresher training, educational materials and access to external resources to help employees recognise indicators of modern slavery and understand reporting procedures

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

This statement has been approved by the Board of Directors and covers all companies within the group. It is signed by Kamal Shergill, the Group HR Director of Axis CLC.



KAMAL SHERGILL
GROUP HR DIRECTOR

Version Control

Version	Date	Author	Change Description

Axis CLC v1.0	April 2026	HR	Axis CLC joint policy