

Modern Slavery Statement

The Modern Slavery Act 2015

Section 54 of the Modern Slavery Act 2015 (the “Act”) requires commercial organisations supplying goods or services in the United Kingdom which have a turnover of over £36 million per annum to publish a “Slavery and Human Trafficking Statement”. The statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in any part of its business and supply chain, or to declare that no such steps have been taken.

What is Modern Slavery?

Modern Slavery is an international crime, affecting an estimated 40.3 million slaves worldwide (ILO, 2016).

It is a growing issue that transcends gender, age, and ethnicity. It includes victims who have been brought from overseas, and vulnerable people in the UK, who are forced to legally work against their will across a variety of sectors such as agriculture, hospitality, construction retail and manufacturing.

Paxton’s Policy

Paxton is working towards a zero-tolerance position on violations of anti-slavery and anti-human trafficking laws. If we find breaches of these laws in any area of our business or supply chain, we will look to support others in their efforts to comply with the legislation. We will also actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced, or child labour.

Our Company Values; World-Class, Collaboration, Honesty and Simplicity underpin our culture and how we do business. Our values are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients, and all other stakeholders. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, honest, and trusted. All of our company policies and procedures are in line with our culture and values.

Our Structure and Supply Chains

Paxton Access Limited is a private limited company, owned by our Chairman and led by our board of directors. We employ over 260 direct employees in the UK across our two sites in Sussex as well as those working remotely throughout the UK, US, France, Germany, UAE and South Africa.

Paxton Access Limited works closely with its suppliers across a wide range of sectors, including engineering, manufacturing, information technology, human resources and benefits, insurance, and facilities management. In addition, the company works with several professionals, consultants, and contractors.

We have a dedicated Procurement and Supply Chain team based in the UK, who work directly with our supply base, source componentry for product manufacture and manage supply chain risk.

Paxton Access Limited is part of the Paxton Group; a network of six companies (including one franchise) based in the USA, UAE, UK, Germany, and Belgium. Each member company operates as a separate legal entity and this statement relates to Paxton Access Limited, its structure and supply chain.

Our Procedures

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chain.

Employment:

- Thorough recruitment processes in line with EU and UK employment law, such as 'eligibility to work' document checks, seeking references, contracts of employment and checks to ensure everyone employed is 16 years of age or over;
- Standardised working patterns within the frameworks established in the Working Time Regulations;
- Accredited Voluntary Living Wage employer;
- Market-related pay and reward; which is reviewed annually;
- An enhanced benefits package, providing a variety of health and wellbeing options to support our employees' (and their families) lifestyle choices.

Transparency in our Supply Chain

We recognise our company is exposed to greater risk when dealing with its suppliers, especially those who have operations/supplies in other territories. The following measures to review and manage this risk are in place:

- A commitment to collaborate closely with suppliers to help them understand and work towards their own obligations under the Modern Slavery Act, or how they could comply with our requirements;
- A Supplier Code of Conduct, which all suppliers of goods used in our products, have signed up to.
 - This sets out the standards we expect from our vendors internationally, and covers labour standards – including provisions for freely chosen employment, wages and benefits, working conditions, freedom of association, health and safety, environmental and ethical considerations.
 - For our Supplier Code of Conduct we have adopted a form applicable for our industry (authored by the Responsible Business Alliance)
- Continual assessment and mapping of our Supply Chain, to identify high risk areas, and establish plans to mitigate identified areas of concern through re-sourcing or collaboration with vendors.
- Policies and processes to reduce the likelihood of Conflict Minerals entering our Supply Chain.

Our purchasing policies and Supplier Code of Conduct will be reviewed annually, and updated as and when deemed appropriate to ensure they are continually developed and remain fit for purpose.

Employee Training

We want to help our employees to understand more about this growing issue and how to report any suspicion they may have, whether in a business or personal context. We will highlight the modernslavery.co.uk site to our new employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and how to report using the telephone helpline.

We are developing resources with the intention of making them available to all employees, including a training session providing an overview of the Modern Slavery Act and drawing on examples from the modernslavery.co.uk site.

Key Performance Indicators

Going forward, we aim to work towards:

- Developing an employee training session which will be undertaken by all Paxton employees. This will outline what modern slavery is, how to identify it and what our employees should do if they suspect there are any cases of slavery occurring. Completion of this training will form a compulsory part of our employees' annual review and the new starter induction process;
- Verification and assessment of Supplier Code of Conduct provisions through risk assessment and regular auditing.

Paxton Access Limited shall take responsibility for this statement and its objectives which shall be reviewed and updated as appropriate.

Additional Links:

www.modernslavery.co.uk

[Supplier Code of Conduct \(Link to RBA\)](#)

Adam Stroud, Chief Executive Officer