

Modern Slavery Statement

1 January 2024 to 31 December 2024

Document Management

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Modern Slavery Statement

1st January 2024 – 31st December 2024

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 50 million people worldwide (ILO, 2021). 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 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 work with organisations to address and eliminate any involvement 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 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 eight directors. Paxton Group comprises of 396 direct employees in the UK across our 2 campuses in Sussex as well as those working remotely throughout the UK, US, France, and South Africa.

Paxton 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 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 five companies (including one franchise) based in the USA, 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 several 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 employment laws, 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 or local laws.
- Accredited UK 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 and provide confidential counselling and advice on a range of issues.
- An Ethical Behaviour policy for employees to follow to ensure fair working practices, set standards and expectations of behaviour and mutuality of respect at work.
- We have a Grievance Policy where employees can submit a concern or complaint regarding their employment or work environment.
- We host an annual employee survey allowing our people to provide feedback anonymously.
- Culture and Wellbeing conversations with members of the HR team are held annually and our management team are trained on how to hold wellbeing discussions and provide signposting and support to our employees.
- E-learning training on recognising Modern Slavery and how to raise concerns for all new employees in the UK.

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 issue and how to report any suspicion they may have, whether in a business or personal context. We will highlight the issue of modern slavery to our new employees, which includes information on how to recognise different types of slavery, how to spot the signs and how to report any suspicions.

All new UK employees to the company are required to undertake a modern slavery e-learning module, available on our learning management system upon commencing their employment.

We provide specific Chartered Institute of Procurement and Supply (CIPS) training is provided to Supply Chain colleagues working directly with our suppliers.

Key Performance Indicators

Supply Chain: In the past 12 months, seven vendors were re-assessed as part of the regular assessment and auditing programme. Of these suppliers, six achieved another pass status and one was removed from the supply base due to a cessation of business. All vendors that achieved a 'pass' signed up to the Supplier Code of Conduct or had their own corporate Code of Conduct that was equal, if not superior, to the RBA Code of Conduct.

21 employees completed the Modern Slavery e-learning module on our Learning Management System during 2024.

Future aims:

- Completing a formal risk assessment and independent audit of modern slavery in our organisation.
- Rolling out mandatory training to all UK employees on Modern Slavery.
- Over the next 2 years moving our Indirect spend over to our Supply Chain Team so that we benefit from the same level of training and professional negotiation from a team who are all signed up to the CIPS code of conduct.

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

Signed:



Adam Stroud, Chief Executive Officer

Date:

18th November 2025