

Modern Slavery Statement

1 January 2021 to 31 December 2021

Document Management

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Modern Slavery Statement

1 January 2021 to 31 December 2021

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 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 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 384 people in the UK across our two campuses 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 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 several procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chain. These include our employee code of conduct policy and our code of conduct for Suppliers.

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.
- A Code of Conduct 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.

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)
- Regular assessment of all Suppliers, to identify high risk areas, and establish plans to mitigate identified areas of concern through re-sourcing or collaboration with vendors.

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 understand more about this growing issue and how to report any suspicion they may have, whether in a business or personal context. We will make modern slavery e-learning available to all our employees, this course provides useful information on how to recognise different types of slavery, how to spot the signs and how to report concerns. We are developing resources with the intention of making this a mandatory learning module for all new employees to Paxton.

Key Performance Indicators

Future aims:

- Reset the assessment programme and relaunch post-covid, ensuring high spend/risk vendors are assessed as a priority.
- To start to record the number of suppliers being assessed and identifying the number of 'passes' and 'removals' from our supply chain.

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

Additional Links:

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

Signed:

A handwritten signature in blue ink, appearing to read "AS", with a horizontal line extending from the end.

Adam Stroud, Chief Executive Officer

Date:

31st July 2024