

Modern Slavery Statement

1 January 2022 to 31 December 2022

Document Management

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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 seven directors. We employ 381 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.
- 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 (RBA)).
- 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 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 employees to the company are required to undertake a modern slavery e-learning module, available on our learning management system upon commencing their employment.

Key Performance Indicators

Achievements and activities from 1 January 2022 to 31 December 2022.

Supply Chain: The Vendor Assessment Programme for direct spend was reviewed and relaunched post-covid.

This included a review of the RBA Code of Conduct to assure suitability for Paxton. As a result, we continue to reference this Code of Conduct and require all suppliers to recommit to the latest publication at least every 3 years. We also engaged the RBA directly for membership options for future planning.

In total we assessed 40 vendors across the 12-month period. All vendors that achieved a 'pass' signed up to the Code of Conduct or had their own corporate Code of Conduct that was equal, if not superior, to the RBA Code of Conduct. Those that failed to achieve a 'pass' were given recommendations on areas of concern for further improvement. Note that pass/fail criteria are based on a full assessment, and failures do not indicate a direct breach of Code of Conduct or Modern Slavery Laws.

Future aims:

- Planned re-assessments for a further 25+ existing vendors in addition to any potential new vendors.
- Appointment of a dedicated Supply Chain & Quality Director from January 2024, to be qualified or working towards to MCIP.
- To make the Modern Slavery e-learning module an essential course for all new UK-based employees.
- To start to record the number of employees choosing to engage with the Modern Slavery e-learning we will make available on our Learning Management System.

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:



Adam Stroud, Chief Executive Officer

Date:

31st July 2024