



## Modern Slavery Statement

AxiCorp Financial Services Pty Ltd  
ACN 127 606 348

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## About this Statement

The statement is made and published in respect of AxiCorp Financial Services Pty Ltd an Australian registered company (ACN 127 606 348) and Australian Financial Services Licence (AFSL number 318232).

## Overview

Axi is a leading global provider of margin foreign exchange and contracts for difference (“CFD”s). We offer fully regulated retail and institutional trading. Founded in Sydney in 2007 and trusted for over ten years, our business has evolved into a world-class, multifaceted brokerage. With heavy investment in the latest trading technology, Axi seeks to offer the most comprehensive end-to-end trading experience available, servicing traders of all levels from beginners to institutional level clients. The Axi group operates in Australia under regulations governed by ASIC<sup>1</sup>.

Axi supports the *Modern Slavery Act 2018* (Australia), whose provisions assist in the eradication of modern slavery, wherever it may occur, and raise public awareness of the issue.

## Our Approach

Axi has a responsibility to respect human rights in their operations and supply chains, as outlined in the “United Nations Guiding Principles on Business and Human Rights<sup>2</sup>”, and this includes appropriate measures to assess and address modern slavery risks. Entities that take action to combat modern slavery in their operations and supply chains can protect against possible business harm and improve the integrity and quality of their supply chains.

At Axi our vision is to:

*make a positive impact on people’s lives everywhere we go*

We support and respect the protection of internationally proclaimed human rights and endeavour to make sure that Axi is not complicit in human rights abuses. Axi acknowledges the importance of respecting human rights and combating modern slavery that it may be exposed to through its operations or supply chains. We are committed to achieving the highest standards of ethical behaviour in the conduct of our business and activities worldwide.

Axi does not tolerate slavery, human trafficking, abusive or unfair treatment in any part of our business, or in any of our supply chains. Through our policies and procedures for procuring services and resources, Axi is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains.

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<sup>1</sup> [ASIC Home | ASIC - Australian Securities and Investments Commission](#)

<sup>2</sup> [OHCHR | OHCHR and business and human rights](#)

## ***Our operations and supply chain***

Axi operates in the financial services sector, which in general, is assessed as low risk in respect to modern slavery. Axi primarily operates in countries which are assessed by the Global Slavery Index<sup>3</sup> as having a lower prevalence of modern slavery with the governments of these countries actively responding to the issues that modern slavery poses.

Axi's supply chain primarily provides professional and technical services and is considered low risk in respect of modern slavery. Axi's suppliers provide services in respect of:

- ❖ Liquidity – arranging for clients of Axi to purchase and sell financial instruments;
- ❖ Insurers – providing insurance covering Axi's business;
- ❖ Payments – banking and processing of payment services;
- ❖ Professional Services – provision of audit, legal and professional services;
- ❖ Service Providers – providing Axi with a range of services from leasing of offices, marketing material, through to recruitment services; and
- ❖ Technology – information technology hardware and software related services.

Axi expects the same high standards from all its contractors, suppliers and other business partners. When considering potential suppliers, Axi requests suppliers to demonstrate the measures they have in place for combatting modern slavery. Axi will then make an assessment and determine if the providers policies, procedures, and processes meet Axi's requirements and standards.

## ***Policies and Procedures***

Axi is committed to acting ethically and with integrity in its business dealings and relationships and to ensure effective measures operate to assist in the eradication modern slavery and reducing the potential risk of this occurring in Axi's business and supply chain.

The measures Axi has in place to mitigate the potential risk of modern slavery include Axi's policies and procedures, in particular the:

- ❖ Code of Conduct defines what we expect of our people and the way they conduct themselves during their time with Axi;
- ❖ Anti-Bribery and Corruption Policy defining Axi's commitment to the deterrence of bribery and corruption;
- ❖ Anti-Modern Slavery Policy defines Axi's commitment and measures in place to assist in combatting modern slavery;
- ❖ Anti-Money Laundering and Counter Financing of Terrorism Policy defining Axi's commitment to the deterrence of money-laundering and financing of terrorism;
- ❖ Supplier Onboarding and Monitoring Policy and Procedures requires consideration whether it is appropriate to enter into and continue relationships with our suppliers; and
- ❖ Whistleblower Policy allowing Axi staff to raise any concerns they may have about any individuals or organisations which Axi interacts with.

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<sup>3</sup> The [Global Slavery Index](#) provides a country by country ranking of the number of people in modern slavery, as well as an analysis of the actions governments are taking to respond, and the factors that make people vulnerable.



## **Supplier Due Diligence**

Recognising that the greatest risk of modern slavery is in our supply chain, Axi will continue to take appropriate measures to ensure that these risks are both managed and reviewed.

- ❖ Axi reviews its assessments of its suppliers and given the nature of Axi's business and the suppliers Axi has relationships with, in respect of modern slavery Axi is satisfied with these suppliers meet the requirements and expectations.
- ❖ Axi's contractual terms with its suppliers include undertakings that suppliers comply with all applicable laws, regulations, and codes of conduct.
- ❖ Axi's onboarding of new suppliers requires appropriate due diligence is conducted including the potential for modern slavery. Any supplier whose reputation or practices may raise concerns for Axi, are explored further to ascertain if it is appropriate to onboard such a supplier.
- ❖ Axi's existing relationships with suppliers are reviewed periodically and consider continuance of relationship.
- ❖ Axi's periodic review of its enterprise risk profile includes the assessment of risk relating to modern slavery.

## **Staff Training**

Axi's staff training programme includes training relating to modern slavery which is completed by Axi staff globally. As part of Axi's periodic review of training content, Axi will consider if further enhancements may be beneficial.

## **Recruitment and welfare of our people**

Axi employs nearly 300 staff members in a number of locations across the globe and values the people that choose to work for Axi. Axi uses recruitment firms who meet relevant employment local laws and regulations. Axi periodically reviews its human resources policies and procedures to ensure these continue to be relevant in respect of respective employment law.

## **Approval**

This statement was prepared by members of Axi's risk management division, endorsed by Axi's Risk, Audit and Compliance Committee and approved by Axi's Board of Directors.

Signature: 

Name: Rajesh Yohannan

Position: Director AxiCorp Financial Services Pty Ltd

Date: 20/08/2021