



# Modern Slavery Statement

December 2024

AxiCorp Financial Services Pty Ltd

ACN 127 606 348

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## **About this Statement**

This statement is made pursuant to Part 2 of the Modern Slavery Act 2018 (Cth)(Aust) and Section 54 of the Modern Slavery Act 2015 (UK). It sets out the approach taken by AxiCorp Financial Services Pty Ltd (“**Axi**”), an Australian registered company (ACN 127 606 348) and Australian Financial Services Licence (AFSL number 318232), and all Axi owned and controlled entities, in identifying and managing the risk of modern slavery.

## **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, Australia 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.

Axi supports the *Modern Slavery Act 2018* (Cth)(Aust) and the *Modern Slavery Act 2015* (UK), 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>1</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> [OHCHR | OHCHR and business and human rights](#)

### ***Our structure, operations and supply chain***

Axi operates in Australia under regulations governed by ASIC<sup>2</sup>, with offices in the United Kingdom, New Zealand, and various countries around the world.

Axi operates in the financial services sector, which in general, is assessed as low risk in respect to modern slavery. The countries that we operate in<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 the leasing of offices, and marketing material, 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 their 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 of modern slavery and reduce the potential risk of this occurring in Axi's business and supply chain.

Axi's policies and procedures mitigate the potential risk of modern slavery at Axi, relevantly 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

<sup>2</sup> [ASIC Home | ASIC - Australian Securities and Investments Commission](#)

<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.

- ❖ Whistleblower Policy allowing Axi staff to raise any concerns they may have about any individuals or organisations which Axi interacts with.

### **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. To identify and mitigate exposure to modern slavery practices, we carry out due diligence on all suppliers, contractors and agents throughout our supply chain.

- ❖ 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 to be conducted including the potential for modern slavery. Any supplier whose reputation or practices may raise concerns for Axi is explored further to ascertain if it is appropriate to onboard such a supplier.
- ❖ Axi's existing relationships with suppliers are reviewed periodically to evaluate the continuance of the relationship.
- ❖ Axi's periodic review of its enterprise risk profile includes the assessment of risks 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 more than 300 staff members in several locations across the globe and values the people who choose to work for Axi. Axi uses recruitment firms that 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 laws.

### **Consultation and Approval**

This statement was prepared by members of Axi's risk management division, representing all Axi-owned and controlled entities. It has been endorsed by Axi's Risk, Audit and Compliance Committee and approved by Axi's Board of Directors.

Signature:  DocuSigned by:  
Rajesh Yohannan  
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Position: Director, AxiCorp Financial Services Pty Ltd

Date: 12 December 2024