

## **Axiom's Transparency Statement on Human Trafficking and Modern Slavery**

Axiom is committed to conducting business in accordance with the highest standards of ethics, honesty, integrity, and fair dealing. A commitment to behaving responsibly is at our core and it extends to everything we do, and to those with whom we interact.

### **OUR ORGANISATION AND BUSINESS**

This statement is published by Axiom Global Inc. ("**Axiom**"), in respect of itself and all its subsidiaries within the Axiom group ("**Group**"). Our Group consists of the following legal entities:

- Axiom Global Inc., an American Company
- Axiom Global Canada Inc., a Canadian Company
- Axiom Global Limited, an English Company
- Axiom Global AG, a Swiss Company
- Axiom Global (Deutschland) GmbH, a German Company
- Axiom Global HK Limited, a Hong Kong Company
- Axiom Global Solutions Private Limited, a Singapore Company
- Axiom Global Australia Pty Ltd, an Australian Company

We are the global leader in high-calibre and diverse legal talent and currently operate in the following regions: North America, Europe (including the United Kingdom, Germany, and Switzerland) and Asia Pacific (including Hong Kong, Singapore, and Australia).

### **OUR VIEW ON MODERN SLAVERY AND HUMAN TRAFFICKING**

We do not tolerate modern slavery or human trafficking either within our business or within our supply chains. We expect our supply chains (whether direct suppliers or those that directly or indirectly provide goods and/or services to our direct suppliers) to share the same values.

As we provide legal talent to our clients on a global basis, we have supply chains that support our business and enable us to provide these services. Our supply chains comprise of a wide range of suppliers from small/medium enterprises to global corporates. For example, they include products and services from technology companies (providing us with I.T. hardware and software), maintenance service providers as well as cleaning and catering services for our offices and events.

Due to the nature of the services that we provide and the policies and procedures that we have in place, we consider ourselves to be at "low risk" of modern slavery and human trafficking existing within our business. In relation to our supply chains, we continue to make little use of services demanding unskilled labor. The products and services we do consume are sourced from reputable suppliers.

We do, however, continue to remain vigilant to ensure that this remains the case and we have a dedicated Legal & Compliance function which takes this area very seriously. Our Legal & Compliance function is supported by senior management across Axiom's leadership which strongly advocates against modern slavery and human trafficking.

## **OUR ANTI-SLAVERY AND HUMAN TRAFFICKING PROGRAM**

We have built an anti-slavery and human trafficking program which applies to our Group. Our program consists of the key components outlined below.

### **1. Governance and oversight**

Our Legal & Compliance function have regular meetings to discuss important matters to our Group including in respect of anti-slavery and human trafficking matters. The Chief Legal Officer forms a part of senior management and reports to leadership with relevant updates. Where necessary and appropriate, our Legal & Compliance function also rely on external experts in the area of anti-slavery and human trafficking in order to ensure that our Group is following best practices in its operations.

We have internal escalation channels whereby employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, and contractors within our Group can raise concerns and report instances of potential non-compliance with our values and principles, in full confidence and without fear of retaliation.

### **2. Policy documentation**

We have an Anti-Slavery & Human Trafficking Policy ("**Policy**") which reflects our Group's commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking is not taking place anywhere in our supply chains. Our Policy very clearly informs staff about the importance of this area and covers all of the jurisdictions in which our Group operates. We update our Policy on an annual basis unless there is a need to update it earlier due to legal and regulatory changes or any risks that our business has encountered.

### **3. Due diligence and risk assessments**

While we have evaluated that our business is at "low risk" of modern slavery and human trafficking, we still ensure to conduct due diligence on all suppliers with whom we engage with for goods and/or services. We expect all our suppliers to take a zero-tolerance approach to modern slavery and human trafficking, and to place similar expectations on their respective suppliers.

We evaluate suppliers in respect of a variety of areas of compliance and require them to review and acknowledge our Supplier Code of Conduct which sets out the basic requirements that all Suppliers must comply with to do business with Axiom. The Supplier Code of Conduct requires them to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations, and codes from time to time in force. Additionally, a Supplier Due Diligence Questionnaire ("**Questionnaire**") is circulated to relevant suppliers which requires additional information from them including in respect of whether they have an anti-slavery and human trafficking program in place. As part of Questionnaire, and where applicable, we ask suppliers to provide us with a copy of their internal policy and a weblink to their transparency statement (if they are required to have one under law or have chosen to publish one voluntarily).

Our Legal & Compliance function thoroughly reviews and considers all responses and documentation provided in response to a Questionnaire. It also considers whether it is necessary for the due diligence to be refreshed on a particular supplier within a prescribed timeframe if there are even the slightest concerns in respect of the supplier's approach to anti-slavery and human trafficking.

#### **4. Contractual obligations**

We have created a Supplier Code of Conduct which outlines our high standards and requests that our suppliers review and attest to adhering to our standards.

We also ensure that our terms and conditions require suppliers to:

- confirm that they comply with all laws and regulations including that concerning combating slavery and human trafficking;
- warrant that their business, and to the best of their knowledge, their own supply chains do not use modern slavery and involve human trafficking;
- agree to permit us and/or a third-party acting for us to inspect their facilities, records, and practices, to have access to their personnel and to audit their business for the purposes of ensuring that they comply with these obligations and that there is no use of modern slavery and involvement of human trafficking; and/or
- impose equivalent obligations on their own suppliers as we have placed on them.

#### **5. Training and awareness**

Training on anti-slavery and human trafficking forms part of our training cycle for all individuals who work within our Group. In addition, we train and update personnel working with our supply chain on modern slavery and human trafficking issues, as and when necessary, with a view to reducing the risks of modern slavery and human trafficking in our supply chain.

### **GOING FORWARD**

We will continue to review our anti-slavery and human trafficking program going forward to make sure it supports and furthers our commitment to combatting the risks of modern slavery and human trafficking in our business and our supply chains.

This statement is made pursuant to the United Kingdom's Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018 and constitutes our Group's Human Trafficking and Modern Slavery statement for the financial year ending 2022.

This statement has been approved by the Board of Axiom on May 25, 2023.



*David McVeigh*

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**DAVID MCVEIGH, CEO**