

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

## Introduction

This statement sets out Axter Ltd's (the Company's) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to act ethically and with integrity to prevent slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of the Company's contractors, suppliers and other business partners.

This policy applies to all persons working at the Company or on our behalf in any capacity.

This policy does not form part of our employment contracts and we may amend it at any time.

## Organisational structure and supply chains

This statement covers the activities of the Company.

The Company (Axter Ltd) is part of the global IKO group and a wholly owned subsidiary of IKO-Axter based in France. The Company undertakes flat roof waterproofing design and specification and system material supply on behalf of its clients and customers and is operational in all new construction and refurbishment sectors in the United Kingdom and Ireland. The nature of the Company's supply chain is uncomplex, streamlined and carefully managed by our Supply Chain, Procurement and Sales and Logistics teams.

## Countries of operation and supply

The Company currently operates in the following countries:

- The United Kingdom of England, Scotland, Wales and Northern Ireland and the Republic of Ireland. The following is the process by which the Company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:
- mapping the supply chain broadly to assess material or geographical risks of modern slavery and human trafficking; and
- evaluating the modern slavery and human trafficking risks of each new supplier as part of a more general human rights or labour rights assessment process.

## High-risk activities

Following risk assessment, the Company has identified no activities within its operational function or supply chain that are considered to be at high risk of slavery or human trafficking.

## Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The Managing Director, Senior Leadership team and Supply Chain Manager assisted by specialist legal representatives.
- **Risk assessments:** The Managing Director, Senior Leadership team and Supply Chain Manager assisted by specialist legal representatives are responsible for the Company's human rights and modern slavery risk analysis.
- **Investigations/due diligence:**
  - Supply Chain Manager: responsible for periodically obtaining and reviewing anti-slavery and human trafficking policy statements and initiatives from Axter's supply chain.
  - Procurement Manager: responsible for product and material sourcing, new supplier initiatives and monitoring the fabrication of raw materials into final products.
  - Sales and Logistics Manager: responsible for the transport and flow of goods and services.
- **Training:** Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given annual training in Modern Slavery and the Company's anti-slavery and human trafficking policy.

## Compliance with the policy

All Axter staff must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all staff. They are required to avoid any activity that might lead to, or suggest, a breach of this policy.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, they should raise it formally using the Company's Grievance Procedure.

## Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** - The Company encourages all of its staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company at the earliest possible stage. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for its staff to make disclosures, without fear of retaliation.
- **Employee code of conduct** - The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier code of conduct** - The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat its staff with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their staff's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** - The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Company Code of Ethics** – The Company has a clear Code of Ethics policy that is made available within the organisation, including in the Staff Handbook, to its supply chain and customers.

## Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier as part of a more general human rights or labour rights assessment;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- using an ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- requiring all staff to have completed training on modern slavery annually;
- operating a system for supply chain verification, whereby the Company evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the Company evaluates all existing suppliers.

## Training

The Company requires all staff to complete training on modern slavery annually.

The Company's modern slavery training covers:

- its organisation's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- what external help is available, for example through the [Modern Slavery Helpline](#).
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

## Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

If you are a supplier, contractor or other business partner, we may terminate the Company's relationship with other individuals and organisations working on its behalf if they breach this policy.

## Awareness-raising programme

As well as training staff, the Company raises awareness of modern slavery issues by circulating information to staff on:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company; and
- what external help is available, for example through the [Modern Slavery Helpline](#).

## Senior leadership team approval

This statement has been approved by Axter's senior leadership team (SLT), who will review and update it annually. The SLT has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.

**SIGNED** on ....20/10/2025.....  
on behalf of **AXTER LIMITED**  
by a director:



Signed

Phillip Wilcox-Moore

Director Name

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