

AXIL INTEGRATED SERVICES LIMITED MODERN SLAVERY STATEMENT

Axil Integrated Services Limited (“Axil”) is a private limited company registered in England and Wales (registered number 09204100). Axil recognises the importance of corporate social responsibility and we are committed to operating ethically and with integrity in all our business activities and relationships. We are fundamentally opposed to slavery and committed to understanding the risk of it and ensuring that it does not occur anywhere within our business and its supply chains.

This statement is made on behalf of Axil pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes our anti-slavery and human trafficking statement for the financial year ending 31st March 2027.

Organisational structure, business and supply chains

Axil is a total waste management company, which provides sustainable compliance-led waste management solutions for Britain’s more difficult to handle wastes. Axil has a workforce of approximately **220** people in the UK.

Axil operates a wide supplier base, including many contractors, consultants, companies and professional advisers.

Policy in relation to slavery and human trafficking

Overall responsibility for Axil’s anti-slavery initiatives is held by the Managing Director. Our Anti-Slavery and Human Trafficking Policy is available on request.

We have developed our Anti-Slavery and Human Trafficking Policy which states our commitment to acting ethically and with integrity in all our business dealings and relationships and to aiming to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Policy sets out what we expect from our staff and our aims for our suppliers and sets out a framework for reporting concerns or issues in this area.

We also operate a fully independent whistleblowing facility, which whilst not focused specifically on modern slavery, allows for a procedure for any employee or supplier to raise concerns or issues in confidence in this area.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we are looking at how best we can implement and enforce effective systems and controls to, as far as practical, monitor potential risk areas in our supply chain and protect whistle blowers.

We hope that all those in our supply chain and contractors comply with our values, and we aim to develop a supply chain compliance programme to review this. This will include requiring all new suppliers, when completing our External Waste Controller Audit Checklist, to confirm their adherence to the Act.

Identifying assessing and managing risk

Axil is registered within Wales and England and our business activity takes place across the United Kingdom. As such, we have identified that the risk of modern slavery or human trafficking impacting our business or supply chain is comparatively low.

Despite this, we have highlighted that there are some areas of our operations that are more vulnerable to modern slavery than others, particularly in relation to certain suppliers and sub-contractors for services. To address this specific risk, we plan to include a clause in our standard terms and conditions requiring suppliers and contractors to acknowledge our commitment to combat modern slavery and human trafficking and to meet our ethical standards in this area.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be providing training to key employees on this area.

In order to measure how effective we are in ensuring that modern slavery and human trafficking is not taking place in any part of our business or supply chains we are:

- Reviewing our procurement and tender processes and procedures, so that they include references to modern slavery and human trafficking;
- Updating documentation to include specific reference to the Act to make clear our stance on this issue.
- Revisiting our whistleblowing policy and codes of conduct to ensure they remain fit for purpose in light of the Act's requirements;
- Improving the awareness of our employees, customers and suppliers regarding the Modern Slavery Act 2015, including what constitutes modern slavery and human trafficking;
- Requiring all key staff complete training to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains;
- Being aware of the risk of slavery and human trafficking within our suppliers and supply chains.

This statement will be reviewed annually.

ANTI-SLAVERY and HUMAN TRAFFICKING POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Axil 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 modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

The Axil Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group General Counsel.

Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our whistleblowing policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

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 you believe that you have suffered any such treatment, you should inform your line manager or business unit director. However, where the matter is more serious, or you feel that your line manager or business unit director has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact either the Managing Director or the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Company SharePoint.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all new individuals joining the Company. For existing individual, training will be provided and updated as necessary.

We are aiming for our commitment to addressing the issue of modern slavery to be communicated where possible to all suppliers, contractors and business partners.

Breaches of this policy

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

A handwritten signature in black ink, appearing to read 'Edward Pigg', with a long horizontal stroke extending to the right.

Edward Pigg

Chief Commercial Officer

Date: 15 April 2026