

AXIANS NETWORKS LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2017

Axians has zero tolerance of modern slavery in all forms and understands its responsibility to understand the risks in both its business and supply chain.

This statement has been published in accordance with section 54(6) of the Modern Slavery Act 2015. It sets out the steps taken by Axians Networks Limited ("Axians") during the year ending 31 December 2017 to prevent modern slavery and human trafficking in its business and supply chains.

ORGANISATIONAL STRUCTURE

Axians is a network systems integrator and part of the Vinci Energies group of companies. As part of Vinci Energies' ICT business, Axians works closely with other companies to build a strong network of capabilities. All group companies share a mutual code of ethics and conduct which is signed by the Director and Chief Executive of the Vinci group. Principles of the code of ethics and conduct are reflected within our vision of developing our modern slavery statement.

The Vinci group is a contributing member of the UN Global Compact and takes its responsibility to avoid any modern slavery or human trafficking within its business or supply chain very seriously.

Axians is a reseller of product and services within the UK and a small number of countries outside of the EU.

Axians employs approximately 85 employees, mostly based in Axians' Basingstoke office.

POLICIES

We are committed to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our policies, both internal and external, reinforce our commitment to act with integrity and in an ethical manner in all our business relationships. We enact systems and controls to identify areas of risk both within our business and our supply chain.

The Vinci group have in place a number of key policies which state how we operate as a business and the steps taken to ensure that we are a transparent, accessible and inclusive organisation. These policies are reviewed annually and updated as required to ensure that opportunities for improvement are identified and acted upon.

These policies include:

- Code of Ethics and Conduct
- Corporate Social Responsibility
- Anti-bribery and Corruption
- VINCI Manifesto



- Equality
- Recruitment and Selection
- Whistleblowing

SUPPLY CHAIN

Axians' procurement spend is approximately 88% on more than 20 manufacturers and/or distributors. Axians supplies goods and services manufactured in around 10 countries. Axians' supply chain is diverse and challenges include changing political and economic conditions across the globe.

DUE DILIGENCE

In order to identify potential human rights risks, Axians conducts initial due diligence and then quarterly audits of its supply chain, human resources and finance activities. Axians' focus is to ensure that any identified risks within our business or supply chain are dealt with at the earliest opportunity.

Throughout 2017, Axians' quarterly audits on suppliers and due diligence have not revealed any concerns relating to human trafficking or risk of modern slavery.

We carry out Right to Work and Pre-Employment checks on all employees joining our organisation and this includes verification of identity and that bank account details are accurate and belong to the employee – never a third party. Any discrepancies are acted upon and investigated as appropriate. In 2017, no discrepancies or problems have been reported.

In respect of labour and recruitment, we have a robust system which means we engaged with approved suppliers and partners to fulfil our workforce requirements. Each temporary employee and consultant that have been engaged on our behalf are required to adhere to Axians' Anti-bribery Policy.

This statement was approved by the board of directors of Axians Networks Limited on 27th March 2018.


Russell Crampin, Managing Director