



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

**Fiscal Year 2021**

### **Introduction**

This Statement is made voluntarily pursuant to Section 54(1) of the UK Modern Slavery Act 2015 by Axon Enterprise, Inc. (“Axon” or the “Company”), a Delaware corporation headquartered in Scottsdale, Arizona, on behalf of its subsidiaries (as defined in the UK Companies Act) whether incorporated within or outside the UK (as listed in [Appendix A](#)). This statement is made in accordance with the U.S. Government’s laws and federal contracting rules establishing a zero tolerance policy, prohibiting trafficking in persons, including any trafficking-related activities as well as the U.K Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act, among others. It covers the financial year January 1, 2021 through December 31, 2021.

As the world’s premier public safety company with an emphasis on integrity, Axon recognizes our responsibility to be aware of the risks of modern slavery within our organizations and supply chain and to do our utmost to help eradicate modern slavery. As such, Axon has a zero-tolerance policy, prohibiting trafficking in persons, including any trafficking-related activities. Axon knows that eradicating slavery, human trafficking, servitude and forced labor (altogether “modern slavery”) presents a global challenge for governments and business.

This Statement discusses actions Axon took in the prior fiscal year to address risks of modern slavery in our business and supply chain.

### **Axon Business and Supply Chain**

Axon’s mission is to protect life by creating technology and services that promote safety, efficiency, and transparency. Axon is a developer and manufacturer of advanced conducted electrical devices designed for use by public safety organizations including law enforcement,

military, corrections, private security personnel, and by private individuals for personal defense. Axon manufacturing takes place at its headquarters in Scottsdale, Arizona. In addition, Axon has developed full technology solutions for the capture, secure storage, and management of video/audio evidence, as well as other tactical capabilities for use in law enforcement.

Collectively, Axon's global talent force (as of December 31, 2021) is approximately 2,100 employees (29 of which work in the United Kingdom) and global revenue of approximately \$863 million. As Axon continues to grow and conduct business in many countries, our supply chain is becoming vaster and more diverse.

For more information about Axon and our business, please see our [website](#) and [financials](#), including Annual Reports.

### **Axon Governance and Policies Related to Modern Slavery Risks**

Axon has a zero-tolerance policy regarding trafficking in persons. No employee nor any Axon consultant, contractor, subcontractor, vendor, or supplier shall be involved in the following activities: trafficking in persons, soliciting or obtaining prostitution or any commercial sex act or using debt bondage, slave, forced or child labor. If any employee is found to have engaged in such behavior, Axon will take an appropriate employment action, up to and including termination. If any vendor or supplier is found to have engaged in such behavior, Axon will take appropriate action, up to and including the termination of business relationships.

Axon has issued statements and created policies touching on human rights and labor issues that encapsulate our commitment to eradicating practices of modern slavery, including:

- [Corporate Governance](#)
- [Code of Business Conduct & Ethics](#)
- [Conflict Minerals Report](#)
- [Axon Supplier Partner Information](#)
- [Environmental, Social & Governance FAQ](#)

### **Axon Procedures Related to Risk Assessment, Due Diligence, Contracting & Certification, Auditing, and Training**

Axon annually conducts global supply chain mapping and labor risk assessment. As a result, Axon updates and improves its understanding of its highest risk areas for modern slavery exposure, with a particular emphasis on geography, service type and operational context.

As part of our supplier evaluation and onboarding process, Axon routinely reviews the suppliers' labor practices, amongst other key attributes, such as cost, quality, and service expectations. Axon conducts ongoing due diligence of suppliers based on international indices, media searches and other indicators of supplier risk. As business scales and spend on material increases, Axon unlocks

new tiers of suppliers that are larger and more sophisticated than our previous partners. Axon considers that longer-term relationships with larger and more well-established suppliers will assist to address the risk of slavery and human trafficking.

Axon's standard contracts with suppliers stipulate that suppliers will comply with all applicable laws, rules and regulations. Axon also requires that suppliers certify compliance with our Axon Supplier Partner Information. Additionally, Axon has a supplier vetting questionnaire that requires all new potential suppliers to answer a number of questions providing background information on their company and other relevant data points. This will assist in identifying unethical practices.

As part of our supplier management process, Axon audits suppliers by requiring them to demonstrate conformance and assurance that, where applicable, they have flowed down our requirements to their suppliers. With all of our strategic supplier partners, Axon operates in a spirit of continuous improvement, working to identify any area of improvement and further drive value by increasing efficiencies and driving shared cost reductions.

### **Performance against 2020 Modern Slavery Objectives**

The focus of our activity since our first statement (2020) was published has been to carry out improvements to our policies and processes as outlined in the Next Steps section of the statement.

In 2021, Axon conducted a review of the Code of Business Conduct & Ethics, which included updates to our supplier expectations focused specifically on labor and human rights, to more clearly reiterate our stance against modern slavery and human trafficking.

Within the past financial year Axon created an Anti-slavery & Human Trafficking Policy. Its purpose is to give clear view of the values and the principles that underpin all of our work, which we expect all persons involved in our business and supply chain to adhere to.

In 2021, Axon reviewed its corporate compliance program and expanded the Compliance Team, aiming to ensure focus, among other things, on our policies concerning human rights and labor issues and to address the risks in an effective manner.

### **Axon's Priorities for 2022**

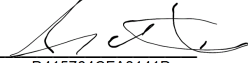
Axon will continue to build on our policies, procedures, and contractual terms as they relate to human rights and modern slavery.

Additionally, Axon will continue working on developing training for relevant Axon employees, to cover introduction to modern slavery and human trafficking, signs to look out for and actions to take.

Finally, Axon acknowledges that further work is required with our wider supply chain, as part of our approach to risk management, to confirm that considerations for prevention of modern slavery are in place.

**Acknowledgement**

Axon's Board of Directors approved this Statement on behalf of Axon on May 19th, 2022.

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Isaiah Fields, General Counsel

## **Appendix A**

### Company Name

Axon Public Safety UK Limited

Axon Public Safety B.V.

Axon Public Safety Germany SE

Axon Public Safety Australia PTY Ltd