



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Fiscal Year 2022

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, 2022 through December 31, 2022.

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, 2022) is approximately 3,000 employees (72 of which work in the United Kingdom) and global revenue of approximately \$1,190 billion. As Axon

continues to grow and conduct business in many countries, our supply chain is becoming larger 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 appropriate 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](#)
- [Forced Labor and Human Trafficking Policy](#)

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

Axon continually updates and improves its understanding of 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 2021 Modern Slavery Objectives

The focus of our activity in 2022 has been on raising employee awareness, aiming to build knowledge and to ensure controls are put in place to detect and prevent modern slavery behaviors.

Within the past financial year, Axon developed a comprehensive training program that covered the legal framework, our policies and procedures, our due diligence processes, and our reporting mechanisms. The training was delivered to all Axon employees.

Additionally, Axon continued the integration of modern slavery and human trafficking related matters into policies, applicable to Axon's suppliers.

In 2022, Axon introduced a new clause into its Supplier Code of Conduct, setting our Human Rights standards and communicating an expectation within Axon's Supply Chain that Axon requires adherence to these standards.

Axon also improved its on-site audit processes by incorporating human rights and modern slavery questions into its evaluation. The goal is to comply with the Modern Slavery Act 2015 and to ensure that our suppliers are not involved in any form of labor exploitation. Axon's on-site audit processes will now involve an assessment of the working conditions and practices of our suppliers. Axon will conduct interviews with management and workers, review documents and records, and observe the workplace environment.

Axon's Ongoing Modern Slavery & Human Trafficking Compliance Work

Axon believes a robust approach to supply chain management is critical for the evaluation and mitigation of risk related to modern slavery and human trafficking. A priority moving forward will include development of a detailed supplier risk profile (by industry, product and region of operation) and the ranking of Axon's suppliers by order of vulnerability. The goals of such mapping are:

- to understand the human rights context and challenges in the countries and sectors where Axon sources materials and services;
- to prioritize the most salient and severe human rights risks and opportunities for improvement;
- to develop and implement appropriate actions and measures to prevent, mitigate and remedy any adverse human rights impacts;
- to communicate and report on our human rights performance and progress to our stakeholders.

Additionally, Axon will coordinate targeted audits on higher risk suppliers, to check their recruitment practices, working and living conditions for their employees, and their subcontractors' labor rights.

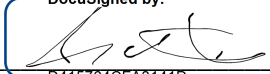
Axon will also expand its onboarding and ongoing supplier due diligence screening with more sustainability topics, including modern slavery and human trafficking, by utilizing the Assent's ESG Survey tool.

Moving forward, Axon will develop and introduce an E-learning training course on Modern Slavery and Human Trafficking, targeting its Tier 1 suppliers. The aim of such course would be to raise awareness and encourage commitment to social responsibility matters into suppliers' operations.

Acknowledgement

This Statement was approved by Axon's Board of Directors on behalf of Axon Enterprise, Inc. and all of its subsidiaries on June 8, 2023.

This Statement was signed by Isaiah Fields, Chief Legal Officer, on June , ^{June 23}2023.

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Isaiah Fields
Chief Legal Officer

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