



Date: August 16, 2024

AXON ENTERPRISE, INC.

HUMAN RIGHTS POLICY

PURPOSE

Axon Enterprise, Inc. (“**Axon**,” “**we**” or “**us**”) is a mission-driven, market-leading provider of law enforcement technology solutions focused on protecting life and promoting peace, justice and strong institutions. Axon envisions a world where bullets are obsolete, social conflict is significantly reduced, and everyone has access to a fair and effective justice system. Our commitment to this vision and our values is demonstrated with the launch in 2022 of our moonshot goal to cut gun-related deaths between police and the public in the United States in half by 2033. Axon is developing the public safety operating system of the future, integrating advanced hardware devices and cloud software solutions that revolutionize modern policing and serve federal agencies, corrections, justice and enterprise security needs. Our suite includes cloud-hosted digital evidence management, productivity and real-time operations software, body-worn and in-car cameras, TASER energy devices, and robotic security and training solutions.

Dedication to human rights is therefore fundamental to Axon's mission to Protect Life as well as to [Axon's values](#), including our commitment to win right and with integrity. By respecting and supporting internationally proclaimed human rights, we strive to maintain the alignment of our actions with the highest ethical standards, reflecting our commitment to the dignity and well-being of all individuals. This dedication drives us to rigorously evaluate our operations to avoid human rights abuses and contribute to an inclusive and just environment. Our commitment to human rights is not just a policy but a key component of our operations, embodying our mission and values in every aspect of our business.

OUR WORDS: KEY PRINCIPLES

This Policy and Our Approach to Human Rights

At Axon, we are committed to conducting business in compliance with applicable laws and the international standards articulated in the [United Nations Universal Declaration of Human Rights](#) and the [United Nations Guiding Principles on Business, and Human Rights](#), among others. This policy applies to and governs our interactions with employees, officers, directors, partners, vendors and suppliers worldwide and is based on our goal of upholding the highest standards of ethical conduct by embracing key principles related to human rights. Our commitment is mirrored in our efforts to maintain and enhance systems and practices that prevent adverse human rights impacts within our operations, including our supply chain and product development.

Labor

Axon recognizes the rights of employees to freely associate or not associate with labor and other third-party organizations along with the right to bargain or not bargain collectively in accordance with local laws. We are committed to fostering a fair and balanced workplace in which employees may advocate for their interests and express their concerns and suggestions. We believe creating a successful and dynamic workplace involves embracing open communication to build transparency and trust, encouraging collaboration to collectively develop solutions, and continuous learning to adapt to changing industry demands, fostering both personal growth and organizational resilience.

Axon is committed to eliminating forced labor, including all forms of slavery and human trafficking, maintaining human dignity and ensuring that all work is freely chosen and that the terms of work are voluntary. We will not use or tolerate the use of child labor. By remaining vigilant in our business and supply chain, we seek to protect the rights and development of children, allowing them to pursue education and growth without exploitation. We believe that by upholding human rights, we also promote fair labor practices, enhance economic stability and build a foundation for sustainable development.

Lastly, we strive to ensure that opportunities are based on merit and do not tolerate discrimination, including on the basis of race, religion, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, military or veteran status, or any other characteristics protected by applicable law. We believe eliminating discrimination is vital to allowing all individuals to have a fair chance to succeed based on their abilities and contributions. This commitment to fairness not only upholds the principles of justice and equality but also drives innovation and growth by bringing diverse perspectives and talents into our organization. Ultimately, we believe promoting equity and inclusion is not only the right thing to do but also a strategic imperative that enables us to thrive in a diverse and dynamic global market.

Environment

Through the integration of environmental, health, and safety (EHS) factors across our global operations, we seek to safeguard our workforce, the communities we serve and the planet, fostering heightened productivity and sustainable growth. In addition to complying with applicable regulations, we also endeavor to propel the advancement of technologies that bolster the long-term resilience of our global ecosystem. We recognize the importance of proactively addressing potential environmental risks by managing energy consumption, reducing greenhouse gas emissions, minimizing waste generation, conserving water resources and promoting the responsible use of natural resources. By undertaking initiatives to promote greater environmental responsibility, we strive to minimize our environmental impact and inspire others to do the same.

Anti-Corruption

At Axon, we are firmly committed to upholding integrity by working against corruption in all its forms, including extortion and bribery. Our anti-corruption and anti-bribery policies and procedures are outlined in our Global Anti-Corruption Policy, which sets forth our expectation that our operations are conducted with the highest level of honesty and fairness both domestically and abroad. Through our unwavering stance against corruption, we aim to build lasting trust with our stakeholders and contribute to a more just and transparent business environment.

OUR ACTIONS: KEY INITIATIVES

Prioritizing Ethical Business Practices

We believe that ethical conduct is the foundation of a trustworthy and reputable business, as reflected in our [Code of Business Conduct and Ethics](#) and [Code of Ethics for Senior Financial Officers](#). The principles in our Code of Business Conduct and Ethics are implemented in additional, more specific policies, including our Global Anti-Corruption Policy, and related procedures. As an organization, we place significant emphasis on steadily evolving our anti-bribery and anti-corruption program and actively training our employees, contractors and partners to recognize and resist corrupt activities, fostering a culture of ethical decision-making and accountability. These practices not only underpin compliance with laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), as we continue to scale our business internationally, but also seek to ensure our participation in domestic and international trade contributes to equitable economic growth.

Conducting Risk-Based Due Diligence

We believe risk-based due diligence helps us in identifying, assessing and mitigating risks associated with our business dealings, including those related to human rights. By understanding the parties and the nature, circumstances and location of proposed transactions, we can anticipate and address potential human rights risks, such as supply chain conduct and environmental impacts. The extent of our due diligence varies with the potential level of risk but generally includes the screening of counterparties against government-issued lists and other database searches, with any red flags escalated to senior management, supporting oversight and adherence to high ethical standards. For example, due diligence of our sales partners outside of the United States includes review of third-party references, corporate and financial records, as well as interviews and site visits as appropriate to confirm whether our partners are aligned with our mission and values. We also seek to reinforce our expectations through certifications and ongoing contractual commitments from our business partners.

Tracing Conflict Minerals

We conduct regular due diligence to identify, assess and mitigate the risks associated with any conflict minerals in our supply chain. We file annually with the U.S. Securities and Exchange Commission a Form SD, which includes our Conflict Minerals Report. This process involves identifying and addressing the use of tin, tungsten, tantalum

and gold (commonly known as 3TG minerals) in our products, which may originate from conflict zones such as the Democratic Republic of the Congo and adjoining countries. We conduct a reasonable country of origin inquiry (RCOI) to determine whether these minerals are necessary to the functionality or production of our products and, to the extent that is the case, we perform due diligence on the source and chain of custody of these minerals. Our disclosures aim to promote transparency and support our responsible sourcing practices, thereby contributing to the reduction of funding for armed conflict and human rights abuses in the affected regions.

Combatting Modern Slavery

We comply with the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act, Part 2 of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and U.S. federal contracting rules, maintaining a zero-tolerance policy against human trafficking, forced labor and child labor. We conduct regular risk assessments to identify, assess and mitigate modern slavery risks, which build on our risk-based due diligence approach, including, in certain contexts, due diligence measures to trace the origins of materials used in our products and scrutinize labor practices within our supply chain. We communicate clear expectations regarding modern slavery compliance to our suppliers and business partners, requiring robust contractual commitments (including audit rights), and certification of adherence to our [Supplier Code of Conduct](#). We are committed to continuous improvement, by regularly reviewing and evolving our operations to align with evolving legal standards and best practices, consistent with our dedication to eradicating modern slavery in all its forms. Our efforts in this area are described in our annual Modern Slavery and Human Trafficking Statement, which we post to our website at <https://investor.axon.com/documents-and-charters>.

Celebrating a Diverse Workforce

Axon is committed to attracting and developing diverse teams that reflect the communities we serve, which we believe is crucial to the success of our mission to Protect Life. Through our Justice, Equity, Diversity & Inclusion (JEDI) initiative, Axon embeds these principles into its recruiting strategies, organizational culture and aims to advance internal diversity and inclusion guided by input from employees, leaders and the communities we serve. We foster engagement through Employee Resource Groups, which promote cultural awareness and address community needs, while fostering belonging and professional development for our employees. Axon invests in skill development through global training programs, many of which are designed to reinforce initiatives that support our commitment to human rights. We publish key metrics to highlight opportunities and drive accountability, including gender diversity across our Board of Directors, leadership and total workforce, and racial/ethnic diversity in our workforce at <https://www.axon.com/jedi>. We also report in our Annual Report on Form 10-K filed with the Securities and Exchange Commission key employee metrics, including our regrettable attrition rate and employee satisfaction scores based on employee engagement surveys.

Fostering Responsible Product Development

We believe that how we make our products matters just as much as what we make. Our [Responsible Innovation Framework](#) is an integral part of our commitment to Protect Life. It is a collaborative effort designed by diverse stakeholders, including industry experts, academics, policymakers, public safety and community representatives. It aims to guide the development and deployment of technologies in a way that is ethical, inclusive, and sustainable. We also engage with our Ethics and Equity Advisory Council (EEAC), which routinely provides feedback throughout the product design and development process to help ensure that we are investing to build a safer future for all. By incorporating a wide range of perspectives, the framework ensures that innovation is aligned with societal values. This approach involves thorough ethical assessments and stakeholder engagement, ensuring that the impacts on all communities are considered, especially the most vulnerable, while addressing potential risks and promoting positive outcomes. It provides a set of principles and best practices for responsible decision-making, stakeholder engagement, and continuous assessment throughout the innovation lifecycle, guiding how we approach hard questions about emerging technology and evaluate our products to be a force for good.

Building Sustainable Practices

We believe preservation of the environment is the responsibility of all Axon employees and those conducting any activities on behalf of Axon, as reflected in our [Environmental Policy](#), our implementation of an environmental management system and achievement of ISO-14001 certification. We continuously search for opportunities to promote positive environmental practices, which includes sustainable management of materials during product procurement and end of life. We are proud of our steady improvements in this area, which include increasing adoption of sustainable packaging materials, implementing product recycling programs, and environmentally responsible disposal of electronic and electrical waste. We also encourage our supply partners to manage manufacturing consumables, which reduces Axon's on-hand inventory and the amount of expired product to be disposed. Our environmental initiatives extend to the way we manage our facilities, including retrofitting Axon facilities with LED lighting where possible, and to our approach to employee commuting and travel, with a view to progressively minimizing our environmental impact over time.

Monitoring International Sales and End-Use

We comply with U.S. trade laws and regulations, and align with U.S. national security and foreign policy objectives. Our robust international trade compliance program focuses on export, sanctions, bribery and corruption risks. Sales of certain of our products, including our TASER energy devices, undergo additional review and approval by the U.S. Department of Commerce, including the Bureau of Industry and Security. Along with the identified end user and intended use, human rights considerations are expressly taken into account during the review process, as mandated by law and policy. Additionally, governments of the countries to which we export typically conduct their own reviews, reflecting a shared commitment to considering human rights risks in our industry.

While we do not always know nor can we control how our customers or the other end-users may use our products, Axon does not support our products being misused to adversely impact human rights. In the event such misuse is discovered, Axon will undertake review and take action up to and including restriction or cessation of business with the identified third party.

Engaging with Customers and the Communities We Serve

Axon is deeply committed to community engagement initiatives that prioritize human rights and social welfare. Through [Axon Aid](#), our employees actively seek opportunities to support public safety and communities with no cost resources, especially during times of crisis. This includes providing financial assistance to the families of officers who have made the ultimate sacrifice in the line of duty. Axon Aid plays a vital role in emergency response efforts, such as natural disasters and civil unrest, while also offering support to grieving families and deploying resources like drones for disaster recovery. These community initiatives reflect our values and our dedication to making a positive impact in the communities where we live and work. As noted above, we also look to the communities we serve to provide feedback on our products, initiatives and goals with a view to promoting human rights collectively.

Promoting Good Governance

We believe good corporate governance is essential in supporting human rights as it establishes the framework through which companies can ensure ethical practices and accountability. We regularly engage with our shareholders and evaluate potential changes in response to their feedback. In collaboration with other committees of our Board of Directors and the Company's management as appropriate, our Nominating and Corporate Governance Committee is responsible for identifying and monitoring emerging corporate governance issues and trends, including any material environmental or sustainability-related issues and the Company's strategy with respect to social matters of significance to the Company. In doing so, it consults with our Enterprise Risk and Compliance ("**ERC**") Committee with respect to our approach to key human rights risks, as well as the integration of such risks into our enterprise risk management framework and regularly assessed along with other key risks and compliance initiatives. Members of management responsible for our operations, including our supply chain and facilities, regularly report to our ERC Committee, which in turn reports to the full Board.

Upholding Transparency and Accountability

At Axon, we provide our workforce, customers, partners, vendors and suppliers with multiple avenues to confidentially report potential policy violations, including anonymously by submitting electronically to [EthicsPoint.com](#) or by calling the EthicsPoint hotline at 844-428-6530. Reports are thoroughly investigated and appropriate remedial actions are taken promptly. We report all such submissions and their resolution to our Audit Committee. We also empower individual employees to uphold this policy by encouraging them to report any violations or suspicions to their manager or to a member of Axon's People Operations or Legal Departments. Non-compliance with our policies,

including this policy, constitutes a breach of Axon's Code of Conduct of Business Conduct and Ethics and may result in disciplinary measures, up to and including termination of employment. Reprisal, threats, retribution, or retaliation against any person who has in good faith reported a violation or a suspected violation or suspicion, or against any person who is assisting in any investigation or process with respect to such a violation or suspicion, is strictly prohibited.

CONCLUSION: FORWARD-LOOKING

Axon is steadfast in its mission to protect life, capture and preserve truth, and accelerate justice. Our comprehensive approach encompasses an advanced safety ecosystem, responsible product development and rigorous due diligence designed to uphold the highest standards of human rights and labor practices. Axon's dedication to environmental sustainability and anti-corruption further reinforces our commitment to ethical business operations. Through continuous engagement with our stakeholders and community at large, transparency in our actions and efforts, and a focus on diversity and inclusion, we strive to create a safer and more equitable world. Ultimately, Axon's core values and mission drive us to make a positive impact on society and build a future where everyone can thrive.

CAUTIONARY STATEMENT REGARDING FORWARD-LOOKING STATEMENTS

This policy contains "forward-looking statements" (including for the purposes of the Private Securities Litigation Reform Act of 1995, the safe harbor provided by Section 21E of the Securities Exchange Act of 1934 and Section 27A of the Securities Act of 1933, and similar laws in other jurisdictions). These forward-looking statements, wherever they occur in this policy, are necessarily assumptions, analyses, estimates and expectations based on current conditions and future projections that reflect the best judgment of the management of Axon as of the date they are made, and involve a number of risks and uncertainties that could cause actual results to differ materially from those expressed or suggested by the forward-looking statements.

Words such as "may," "will," "estimate," "project," "plan," "potential," "goal," "continue," "future," "intend," "expect," "strive," "anticipate," "believe," "would," "should," "could" and similar expressions are often used to identify forward-looking statements. Forward-looking statements are found at various places throughout this policy. Important factors that could cause actual results to differ materially from those indicated by such forward-looking statements include those set forth in Axon's filings with the Securities and Exchange Commission, including our most recent Annual Report on Form 10-K and Quarterly Reports on Form 10-Q. You should bear these factors in mind as you consider forward-looking statements.

Axon undertakes no obligation to publicly update any forward-looking statement, whether as a result of new information, future events or otherwise, except as required by law. In the event that Axon does update any forward-looking statement, no inference should be made that Axon will make additional updates with respect to that statement, related matters or any other forward-looking statements. No representations or warranties, expressed or implied, are given by or on behalf of the Company as to the achievement or reasonableness of any targets, goals, commitments, expectations, estimates, projections, plans, forecasts, outlook, objectives or prospects described herein.