

# Modern Slavery and Human Trafficking Statement

PHX099

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# Policy Statement

**The Modern Slavery Act 2015 requires each business with an annual turnover of over £36m to publish a transparency statement which sets out the steps they have taken to ensure there is no modern slavery in their own business or in their supply chains. This statement is made pursuant of the Act.**

**Modern slavery is a crime and a violation of fundamental human rights. It can take various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.**

Phoenix Software has a zero-tolerance approach to modern slavery and its constituent parts within its business and supply chains. Phoenix therefore is committed to taking appropriate steps to ensure that everyone that works for Phoenix in any capacity, benefits from a working environment in which their fundamental rights and freedoms are respected.

## Supplier Chain

Phoenix Software is committed to acting ethically and with integrity in all our business dealings and relationships while implementing and enforcing controls to ensure that modern slavery is not taking place anywhere within the business or within our supply chains.

We expect the same high standards from all of our suppliers. As part of our contracting process, we have sought confirmation from our top suppliers of their compliance to the act to include specific prohibitions against modern slavery and we expect that our suppliers will hold their own suppliers to the same high standards.

An employee or supplier must report any incidence or suspicion of modern slavery at the earliest possible stage to Senior Administration or the Operations Manager. Phoenix Software may terminate its relationship with a supplier if it is in breach of this policy. Phoenix Software may elect to work with the supplier to resolve the issue.

The software/licensing business sector is not considered high risk in relation to the Modern Slavery Act 2015. The Company does not enter into intricate supply chains, have multiple levels of contracting or subcontracting, or partner with businesses based in impoverished regions of the world where labour/employment laws are minimal or poorly enforced.

## Employment

Phoenix Software treat our employees in a fair safe lawful, non-discriminatory, and professional manner and provide excellent working conditions including H&S provision, holiday entitlements and other benefits.

Working hours do not exceed the UK working time directive with no compulsory overtime. Recruitment processes are in place to ensure that employment laws are met including "right to work" document checks are carried out, checks to ensure everyone employed is 16 plus and that contracts of employment are issued, which allow both parties to terminate the employment.

Employees are not required fund any recruitment fees incurred with their employment. Employees are able to associate with any unions/workers association.

Phoenix Software requires all employees to act in an ethical manner and to comply with legal requirements at all times by putting our values into practice.

There is a confidential Whistle Blowing Policy in place for any employee to raise concerns relating to the behaviour of suppliers, customers, partners, or employees.

Phoenix Software does not consider that the potential risk of slavery or trafficking has increased for the business as a result of the COVID-19 pandemic. We continue to focus on the wellbeing, health, and safety of our employees and to maintaining responsible relationships with our suppliers during the pandemic.

## Version Control

<u>Author</u>	<u>Version</u>	<u>Date</u>	<u>Description</u>
QMS	1.0	01/04/2019	Original Document
QMS	2.0	21/07/2021	Amendments following annual review
QMS	2.0	01/11/2021	Annual review – no changes
Clare Metcalfe	3.0	01/05/2022	Company updates
Trevor Hutchinson	3.0	01/11/2022	Annual review – no changes

## Document Approval

<u>Name</u>	<u>Version</u>	<u>Date</u>	<u>Position</u>
Sam Mudd	1.0	01/04/2019	Managing Director
Sam Mudd	2.0	21/07/2021	Managing Director
Sam Mudd	2.0	01/11/2021	Managing Director
Clare Metcalfe	3.0	01/05/2022	Operations Director
Clare Metcalfe	3.0	01/11/2022	Operations Director

Signed: *Clare Metcalfe* Clare Metcalfe, Operations Director

Dated: 01/11/2022