

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.

Our Business And Structure

Phoenix Software Ltd is a UK limited business and part of the Bytes Technology Group PLC.

Phoenix employs approximately 400 people, nearly all of whom work within the UK.

Phoenix enables digital transformation within the Public Sector - including Central, Local Government authorities, educational establishments, housing associations and charitable organisations. We also serve a range of corporate entities.

We support and empower those UK organisations to innovate and transform with cloud and hybrid infrastructures data, AI, security, and collaboration tools.

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 whether they are software, hardware or service led suppliers.

Policy and Procedures

The software licensing and services 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. This is also confirmed from sources such as the Walk Free Global Slavery Index.

Our policy and procedures within our supply chain seek to confirm 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 in our Supplier Code of Conduct. <https://www.phoenixs.co.uk/about-us/corporate-policies/supplier-code-of-conduct>

Should the supply chain assessment not provide the evidence required, the supplier is required to complete a Modern Slavery Risk Assessment. A supplier has 30 days to respond to Phoenix with the completed Risk Assessment. If the supplier does not respond within this timeframe, they will not be onboarded if they are a new supplier, or if they are an existing supplier, they will be removed from our supply chain using the Supplier Non-Compliance Procedure we have in place.

Annual auditing of supply chain takes place with an increase in frequency should concerns be raised.

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 to 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.

Employee Training

Each employee is required to read our Modern Slavery and Human Trafficking Statement upon joining Phoenix. This policy document is also required to be reviewed annually (or upon any updates made) by all employees. The documents are delivered to our employees and their actions tracked within our internal on our Learning Management System (LMS).

Should an employee have not reviewed and agreed to adhere to the contents of the policy within the 30 days or alternative set timescales, automatic escalation is sent to their line manager and ultimately to the Operations Director. Disciplinary action would be invoked if the employee still failed to comply.

The Modern Slavery and Human Trafficking document is reviewed annually as standard but would be updated as and when any additional information be obtained, either from horizon scanning of potential governmental changes or direct legislation instructions.

The document is on our internal SharePoint site for constant review as well as our external website. <https://www.phoenixs.co.uk/about-us/corporate-policies/supplier-code-of-conduct>

Each employee or supplier must report any incidence or suspicion of modern slavery at the earliest possible stage to Senior Administration or the Operations Director. 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.

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
Rebecca Tosler	3.1	27/07/2023	Add reference to Modern Slavery Risk Assessment
Clare Metcalfe	4.0	21/09/2023	Full overhaul of content and added 2 new sections

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
Clare Metcalfe	3.1	31/07/2023	Operations Director
Clare Metcalfe	4.0	21/09/2023	Operations Director

Signed: *Clare Metcalfe* Clare Metcalfe, Operations Director

Dated: 21/09/2023