
PHOENIX RDS
CORPORATE GOVERNANCE & COMPLIANCE POLICIES



Phoenix-RDS

Policy Summary Sheet

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| Policy Number | PRDS-MS-POL-001 |
| Policy name | Anti-Bribery & Corruption |
| Revision | 1.0 |
| Date | 01/01/22 |

This policy sets out Phoenix RDS intentions and commitments relating to ethical operations and our zero tolerance towards corruption in all its forms including extortion and bribery. This zero-tolerance approach extends to money laundering, fraud and tax evasion.

Managers, staff and contractors are expected to comply with this Policy and identify shortcomings or omissions to their line manager.

Phoenix RDS intent is to operate in accordance with UK legislation, Government guidance and industry best practice on Anti Bribery and Corruption (ABAC) This extends to:

- Leadership leading by example, making us aware of the ethical importance and critical role of our ABAC principles
- Not tolerating any level of bribery, fraud or corruption.
 - ✓ We do not, directly or through a third party, promise, offer, make, authorise, solicit or accept any financial or other advantage, to or from anyone to obtain or retain business, or secure an improper advantage in the conduct of business.
 - ✓ We prohibit all facilitation payments as they are bribes.
 - ✓ We do not conduct transactions that involve benefit, property or proceeds resulting from crime including bribery, fraud and tax avoidance
- Ensuring any case involving allegations of fraud, or corruption is thoroughly investigated and dealt with appropriately

We are committed to:

- Making appropriate resources available to implement this Anti Bribery & Corruption Policy.
- Ensuring this policy, and related procedures, are readily accessible and known to all workers and other stakeholders.
- Making it clear to all employee, contractors and business partners that this policy applies to relationships and interactions with politicians, government officers, staff from regulatory agencies as it does to commercial and business relationships.
- Supporting the policy with adequate training, mentoring, advice, support systems, procedures and written information.
- Encouraging employees, and others we interact with, to report concerns when they believe our zero tolerance towards corruption in all its forms, including extortion and bribery, is not being met.
- Ensuring employees, and other stakeholders, understand that where they do report concerns they will be protected and that they have the option of reporting their concerns anonymously.
- Operating rigorous, suitably detailed expenditure approval procedures & maintaining accurate financial records to facilitate audits and reviews.
- Ensuring personal funds are not used to circumvent this policy
- Alignment with key guidance sources including:
 - ✓ The UK Ministry of Justice Quick Start Guide to the Bribery Act 2010;
 - ✓ The UK Ministry of Justice Guidance to the Bribery Act 2010;
 - ✓ UN Global Compact Principle 10 Anti-Corruption Guidance. A Framework for Action;
 - ✓ UN Global Compact - A guide for Anti-Corruption Risk Assessment.
- Compliance with the Bribery Act 2010 and requiring the highest professional ethics, standards and conduct both of ourselves and of our supply chain.
- Performing a risk assessment to determine the company's exposure to bribery and corruption risk. Regularly reviewing and updating the risk assessment to reflect changes in our risk profile.
- Ensuring action we take is proportionate to the identified risks given the nature of our business and the markets we are operating in.

- Ensuring:
 - ✓ Legitimacy of intent can be demonstrated and that our activities, interactions and transactions have a valid purpose and are conducted in line with Phoenix RDS values and expectations
 - ✓ Everything we do is open, transparent and properly documented
 - ✓ Proportionality can be demonstrated where transfers of value made, and resources invested, meet but do not exceed the needs of the interaction or transaction.
 - ✓ We do not exercise undue influence over those who interact with us. We avoid situations that create or appear to create conflicts of interest.
- Conducting appropriate due diligence, before we enter into commercial/business relationships, to ensure we are working with suppliers, vendors and business partners who have comparable and compatible values and standards for:
 - ✓ Business ethics
 - ✓ Rejection of corruption and bribery
 - ✓ Supply chain management
 - ✓ Protection of Intellectual property and company assets
 - ✓ Regulatory compliance
 - ✓ SHEQ
 - ✓ Human rights and labour rights
- Monitoring for breaches that may occur to our ABAC controls.
- Responding to problems promptly, investigating root causes and putting plans in place that help us improve our ABAC Programme.
- Ensuring those involved in any ABAC violation are subject to our disciplinary procedures and, that sanctions are proportionate to the scale and nature of the violation.
- Ensuring that lessons learned reviews, conducted at appropriate times during our business consider the effectiveness of our ABAC organisation and arrangements with a view to identifying continuous improvement opportunities.
- Providing clear audit trails to meet the requirements of internal and external audits.
- Monitoring & reviewing our ABAC organisation, controls and arrangements to ensure we:
 - ✓ understand the effectiveness of procedures over time,
 - ✓ keep pace with changes to the risks and
 - ✓ identify changes in legislation and relevant guidance sources.
- Benchmarking our ABAC organisation and arrangements where evidence indicates this may provide improvement opportunities.

This policy shall be implemented having regard for other relevant Phoenix RDS policies.



Rory Somerset
Managing Director
1st January 2022