
PHOENIX RDS
CORPORATE GOVERNANCE & COMPLIANCE POLICIES



Phoenix-RDS

Policy Summary Sheet

Policy Number	PRDS-MS-POL-002
Policy name	Anti-Slavery & Human Trafficking Policy
Revision	1.0
Date	01/01/22

This policy sets out Phoenix RDS’s intentions and commitments that support the company’s zero tolerance approach to modern slavery both in our own business and in any of our supply chains. Managers, staff and contractors are expected to comply with this Policy and identify shortcomings or omissions to their line manager.

Phoenix RDS’s intent is to operate in compliance with relevant legislation and industry best practice on the avoidance of modern slavery and the elimination of human trafficking. To achieve this our expectations are that:

Suppliers will:

- ✓ Participate in ethical trading audit assessments;
 - ✓ Provide staff with good working conditions, fair treatment and reasonable pay rate;
 - ✓ Respect workers' human rights and comply fully with all applicable laws;
 - ✓ Hold their own suppliers to the same high standards.
- All work must be voluntary, and not done under any threat of penalties or sanctions
 - Workers must not pay any deposits for work, and employers -whether labour users or recruiters -must not keep original copies of identity documents.
 - Indentured labour is prohibited, and workers must be free to leave work at any time, with all salary owed to be paid.

We are committed to:

- Basing our overall approach on the following guidance:
 - ✓ Home Office Guidance on the Modern Slavery Act.
 - ✓ Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland.
- Making appropriate resources available to implement this policy.
- Ensuring the policy and related procedures are easily accessible to all workers and other stakeholders.
- Supporting the policy with adequate training, mentoring, advice and support systems.
- Compliance with the UK Modern Slavery Act 2015 and the Bribery Act 2010, and requiring the highest professional ethics, standards and conduct both of ourselves and of our supply chain.
- Communicating our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- Working with suppliers, vendors and business partners who have comparable and compatible values and standards for:

✓ Business ethics,	✓ Regulatory compliance
✓ Rejection of corruption and bribery	✓ SHEQ
✓ Supply chain management	✓ Human rights and labour rights
✓ Protection of Intellectual property and company assets	✓ Eliminating slavery and trafficking in the supply chain.
- Identification and review of the risk of modern slavery in our operations and supply chain risks at regular intervals (at least annually).
- Including anti-slavery checks in pre-qualifying and approving contractors & suppliers in accordance where risk assessment indicates this is appropriate. This includes:
 - ✓ employment and recruitment agencies and other third parties supplying workers to our organisation

- ✓ suppliers engaging workers through a third party
- Ensuring our employees and contractors exhibit the highest standards of propriety in their dealings with and on behalf of the company whether in their place of employment or on assignments or business trips.
- Encouraging employees, and other stakeholders, to comment on this policy, the effectiveness of its application and any concerns or suspicions of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- Taking seriously any allegations that human rights are not properly respected and ensuring such allegations are fully investigated and remedial action is taken promptly.
- Protecting whistle-blowers on modern slavery and human trafficking issues.
- Ensure that lessons learned reviews with suppliers, at appropriate times for major procurement activity, take issues associated with modern slavery and human trafficking in the supply chain into account.
- Including the organisation and arrangements for the elimination of modern slavery and human trafficking in audit scopes where risk assessment confirms this is an appropriate strategy. Providing clear audit trails to meet the requirements of internal and external audits.
- Maintaining intelligence on the supply and services market to establish and monitor any emerging trends in modern slavery and human trafficking in the supply chain that might necessitate alternative commercial options and contracting strategies.
- Where required, develop and publish a slavery and human trafficking statement each year.

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



Rory Somerset
Managing Director
1st January 2022