



# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

## Introduction

Phoenix Safe Company Ltd not only employ individuals directly, but also maintain relationships with many different organisations in its supply chain and customer base.

This statement and policy is made pursuant to Section 54(1) of the Modern Slavery Act 2015 ('the Act') and sets out Phoenix Safe Company's actions to understand all potential modern slavery and human trafficking risks related to our business, to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

We all have a responsibility to be alert to the risks of slavery and human trafficking, however small in our business and in the wider supply chain. We recognise our responsibility to take a robust approach to modern slavery and human trafficking, and are committed to preventing any such activity within the business or its supply chains.

Our attitude to Modern Slavery is ZERO TOLERANCE. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. Modern slavery encompasses (but is not limited to) slavery, servitude, human trafficking and forced labour.

We demand all who work for us, and all who have, or seek to have, a business relationship with the Company and/or any member of our Group to familiarise themselves with our Anti-Slavery and Human Trafficking Policy, and to act at all times in a way which is consistent with our tolerance and values.

## Purpose of this Policy

Modern Slavery is a criminal offence under the Modern Slavery Act 2015. We will not tolerate the deprivation of a person's being by another in order to exploit them for personal or commercial gain.

We always work to the highest professional standards and comply with all laws, regulations, legislation, rules and best practice relevant to our business and operations.

We are committed to acting ethically and with integrity in all of our business operations and relationships, whether through direct employment, with suppliers or with contractors, and we are committed to implementing and enforcing measures, processes and controls to ensure that modern slavery is not occurring anywhere in our own business or those of our suppliers or contractors.

## Processes for the Prevention of Modern Slavery

### Recruitment

The majority of our recruitment is done directly, through our own HR Department and departmental / hiring managers.

We do on occasion supplement our own recruitment with agency support where necessary, but this is purely in the introduction of candidates, all interviewing, assessing and screening is conducted in house and in the same way as direct recruitment. We operate a robust recruitment process, including conducting thorough Right to Work checks for all employees to safeguard them against human trafficking or being forced to work against their will.

### Supply Chains

Some of our suppliers are European organisations with whom we have collaborative and open relationships. At present we are not aware of any of our current suppliers or contractors using or being involved in modern slavery.

We are committed to ensuring that there is complete transparency in our organisation and in our approach to tackling modern slavery throughout our supply chains. We expect all

of our suppliers, contractors and those with whom we have a business relationship to work to the same high standards and zero tolerance.

Whilst we do not believe that at present we have any activities within the organisation which are considered to be at high risk of slavery or human trafficking, we will communicate and ensure that all our suppliers and contractors understand and are committed to our Anti-Slavery and Human Trafficking Policy, and work to uphold our strong values. We may terminate the contract at any time should any instances of modern slavery come to light.

### Employees

The Company's Anti-Slavery and Human Trafficking Policy will be communicated across the organisation. Departmental Managers are responsible for ensuring that all those who report to them are familiar with, understand and comply with the Anti-Slavery and Human Trafficking Policy and are given refresher training as and when required.

### Responsibility for the Policy

Ultimate responsibility for the commitment and prevention of modern slavery sits with the Board of Directors, who have overall responsibility for ensuring this policy and its implementation comply with legal and ethical obligations. This policy will be reviewed on an annual basis.

### Signed

Daniel Thompson,  
Managing Director  
07/01/20