

Phoenix Medical Modern Slavery Policy V1.1

1. Introduction

Phoenix Medical is committed to ensuring that modern slavery and human trafficking are not taking place within our business operations or supply chains. This policy outlines our approach to preventing and addressing any risks related to modern slavery in compliance with the Modern Slavery Act 2015.

2. Purpose

The purpose of this policy is to:

- Ensure that all employees, suppliers, and stakeholders understand our commitment to preventing modern slavery.
- Outline the steps we are taking to identify, mitigate, and address any risks related to modern slavery.
- Encourage transparency within our operations and supply chains.

3. Scope

This policy applies to all employees, contractors, suppliers, and any other parties working with or on behalf of Phoenix Medical.

4. Our Commitment

Phoenix Medical is committed to:

- Operating with integrity and ethical standards.
- Complying with all applicable laws and regulations regarding modern slavery and human trafficking.
- Identifying and assessing potential risks in our supply chains and business operations.
- Taking appropriate action if modern slavery is identified, including reporting to relevant authorities.
- Continuously improving our practices to combat modern slavery.

5. Supply Chain Due Diligence

Phoenix Medical undertakes a robust due diligence process that includes:

- **Supplier Assessments:** Regular assessments of our suppliers to ensure they are compliant with the Modern Slavery Act 2015.
- **Risk Analysis:** Identifying areas within our supply chains that may be vulnerable to modern slavery and implementing appropriate measures to mitigate these risks.
- **Supplier Contracts:** Ensuring that contracts with suppliers include obligations to comply with our anti-slavery policies and to act in accordance with applicable laws.

6. Supplier Conduct

When dealing with suppliers we avoid:

- Aggressive pricing that doesn't consider production costs.
- Short lead times.
- Late high-volume orders.
- Inaccurate forecasting.
- Late or extended payments.
- Late withdrawal from contracts.
- Issuing unfair penalties.
- Supplying inaccurate technical specifications.

7. Training and Awareness

We are committed to educating and raising awareness among our employees and suppliers by:

- Providing regular training on modern slavery and human trafficking.
- Ensuring that all employees understand the signs of modern slavery and how to report concerns.
- Engaging with suppliers and partners to promote awareness of modern slavery risks.

8. Reporting and Whistleblowing

Phoenix Medical encourages all employees, suppliers, and stakeholders to report any concerns related to modern slavery. We will:

- Provide a confidential and secure whistleblowing mechanism for reporting concerns.
- Ensure that all reports are taken seriously, investigated promptly, and treated with confidentiality.
- Protect whistleblowers from any form of retaliation.

9. Governance and Accountability

The Management at Phoenix Medical holds overall responsibility for ensuring compliance with this policy. Specific responsibilities include:

- **Modern Slavery Compliance Officer:** Appointing a dedicated officer to oversee the implementation of this policy.
- **Annual Review:** Reviewing the policy annually to ensure its effectiveness and making necessary adjustments.

10. Monitoring and Review

Phoenix Medical will:

- Regularly monitor and audit our supply chains to ensure compliance with this policy.
- Review and update this policy as necessary to reflect any changes in law or company operations.
- Report on our progress in combating modern slavery in our annual Modern Slavery Statement.

11. Conclusion

Phoenix Medical is dedicated to playing its part in the global fight against modern slavery. We expect all employees, suppliers, and partners to share this commitment and to actively participate in preventing and addressing modern slavery in all forms.

Approval & Implementation:

This policy has been approved by the Managing Director and is effective from 05/02/2024. It will be reviewed and updated annually or as required.

Signed:



George He

Managing Director