

Supplier Code of Conduct

PHX115

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About Phoenix Software Ltd

Phoenix Software Ltd (Phoenix) is a leading provider of world-class IT solutions. Our growing portfolio of services includes cloud, security, licensing, SAM, storage, virtualisation, and managed services.

Since being established in 1990, Phoenix now employs 350+ people in the UK. Thanks to our passionate people and close partnerships, we have helped the Public Sector and Corporate entities transform workplace and empower individuals.

Mission and Values

Phoenix prides itself on its corporate values and promotes these to its employees, customers, and suppliers.

As a Value-Added Reseller, we strive to give value for money on the products and services we offer, always aiming to reduce cost for customers by providing innovative solutions, but also working with them in an ethical and fair manner.

Phoenix also ensures its suppliers are treated fairly, ensuring invoices are paid in a timely manner as well as promoting fair commercial arrangements that will ultimately benefit them and our customers.

Phoenix encourages all suppliers that the products they supply are from sustainable sources and have excellent quality and environmental practices in place. This includes ensuring that human rights are adhered to throughout the supply chain.

Phoenix is an ethical employer and is committed to raising the well-being, living standards, skills, and health of all its staff.

Legal Regulatory and Ethical Standards

Phoenix requires all its suppliers to comply with all applicable laws, regulations, and standards, including but not limited to DPA 2018, Bribery Act 2010, Criminal Finances Act 2017, and Modern Slavery Act 2015 and Sanction Laws.

Equality and Diversity

Phoenix expects its suppliers to uphold the same values about equality and diversity in the workplace as we do.

Diversity

Phoenix understands the need for diversity in the workforce and believes that this provides a wider opportunity for team members to join us and provide a better business service to our customers.

Respect

Phoenix respects the identities and cultures of employees, customers, and all other stakeholders. The same is expected of all suppliers.

Non-discrimination

Phoenix promotes and strictly enforces that our workplace is free of harassment of any nature. Staff shall not be threatened in any way or be subjected to any sort of harsh or inhumane treatment, including but not limited to mental or physical coercion, sexual harassment or abuse, verbal abuse, or unreasonable restrictions regarding entering or exiting company provided facilities. There is zero tolerance for discrimination based on but not limited to race, colour, ethnicity or national origin, age, gender, sexual orientation, disability, religious views, political affiliation, or marital status.

Compensation and working hours

Phoenix supports equal pay for work of equal value and complies with national laws and regulations regarding working hours, minimum wages, and benefits. Working hours or overtime hour shall not exceed the maximum permitted by applicable laws and regulations. Staff shall always be given reasonable notice for overtime. Staff shall be paid on time at regular intervals as agreed at the time of employment.

Phoenix is a Living Wage Employer and expects its suppliers to either be a Living Wage Employer or adhere to the standards set out by the Living Wage Foundation.

Phoenix adheres to the obligations set out in our Equality Diversity and Inclusion Policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/company/corporate-policies/equality-diversity-and-inclusion-policy/>

Modern Slavery Act

All suppliers are expected to fully comply with the obligations set out in the Modern Slavery Act 2015, including but not limited to the commitment to having a slavery-free supply chain. Suppliers with an annual turnover of more than £36 million are required to produce and publish a Slavery and Human Trafficking Statement each financial year.

Phoenix adheres to the obligations set out in our Modern Slavery Act Policy and expects its suppliers to follow the same in principle.

Phoenix adheres to the obligations set out in our Modern Slavery Act Policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/about-us/corporate-policies/modern-slavery-statement/>

Health, Safety and Well-Being

All of Phoenix suppliers and contractors must comply with the health and safety legislation relevant to the extent of the works or goods supplied. We expect suppliers and contractors to provide all their employees and others under their control with appropriate training, instruction, information, personal protective equipment, and a safe working environment. Any contractor working on behalf of Phoenix must also meet specific requirements as outlined in their contract. Suppliers shall commit to ensuring safe working conditions and a healthy environment for all staff, to aid in the prevention of work-related injuries and illnesses and improvement to well-being.

Phoenix adheres to the obligations set out in our Health and Safety policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/company/corporate-policies/health-and-safety-policy/>

Business Continuity Planning

Phoenix's supply chain is an integral part of the service provided to our customers. It is essential that our suppliers have a robust business continuity plan in place to protect their operations, and so far as is reasonable, protect the operations of Phoenix business operations to the extent that we rely on the Supplier. Events during which Phoenix expects a business continuity plan to be implemented include natural disasters, illness and infectious disease outbreaks, terrorism, and software viruses.

Phoenix adheres to the obligations set out in our Business Continuity Policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/about-us/corporate-policies/phoenix-coronavirus-disease-covid-19-business-continuity-plan/>

Honesty, Integrity, and Fair Business

Honesty and integrity are core to Phoenix values as a business. It is an expectation that Phoenix's suppliers operate with honesty, integrity and transparency in all activities carried out as a business, complying with all relevant legislation including Money Laundering Regulations 2017 and the Bribery Act 2010.

In accordance with the Phoenix policy regarding gifts and entertainment, we do not permit any form of gifting or entertainment which could, or could be perceived to, improperly influence, or induce individuals at Phoenix into procuring from any supplier where they may not ordinarily have done so.

Phoenix adheres to the obligations set out in our Fraud, Bribery and Money Laundering Policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/company/corporate-policies/fraud-bribery-and-money-laundering-policy/>

Phoenix has zero tolerance to and facilitation of tax evasion in line with the Criminal Finances Act 2017. We expect all employees and associated persons to be able to identify and take steps to prevent any scenarios where there may be a risk that they are facilitating others to commit tax evasion, either in the UK or overseas.

Phoenix adheres to the obligations set out in our Corporate Criminal Offence Policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/about-us/corporate-policies/criminal-offence-policy/>

Quality of Service

Phoenix is dedicated to the provision of high-quality services and products to its customers and maintaining a quality management system which ensures we meet the principles of quality, cost and delivery expected by customers.

Phoenix adheres to the obligations set out in our Quality Policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/company/corporate-policies/quality-policy-statement/>

Whistleblowing

Phoenix respects the rights of staff, contractors, and other stakeholders to raise their concerns about possible wrongdoing within the business. Phoenix has well established procedures in place allowing for the confidential disclosure of such concerns such that an investigation may be made into the allegations.

It is an expectation that Suppliers shall establish and implement procedures to ensure the protection of whistle-blower identities, including the ability to make a confidential disclosure to the relevant team member and safeguarding against retaliatory actions which may take place as a result of whistleblowing made in good faith.

<https://www.phoenixs.co.uk/about-us/corporate-policies/whistleblowing-policy/>

Open and Fair Competition

Phoenix complies with the competition legislation. Suppliers shall uphold standards to safeguard fair conduct of business, competition and not obtain undue advantages, and shall not engage in practices including price fixing, bid rigging or blacklisting.

Environmental

As an integral part of Phoenix' values and operations, it expects its suppliers to share the same considerations of mitigating harmful impact on the environment and climate. Preferably there shall be an environmentally trained person employed at or supporting the Supplier.

Phoenix holds the ISO14001:2015 accreditation and suppliers are encouraged to strive for the same, or to follow the guidelines for such accreditation in principle.

Phoenix adheres to the obligations set out in our Environmental Policy and expects its suppliers to follow the same in principle.

<https://www.phoenixs.co.uk/about-us/corporate-policies/environmental-policy-statement/>

Data Protection Act 2018

Phoenix expects its supply chain to protect all data that is provided to them in the course of business, to an appropriate standard as not to cause our Company to lose compliance or regulation through a deliberate act, negligence, or ignorance. Personal, sensitive, or confidential information must not be disclosed to a third party (either by accident or deliberately) without our prior agreement and must be handled according to current, relevant legislation (e.g. Data Protection Act 2018).

Phoenix adheres to the obligations set out in our data protection policies and expects its suppliers to follow the same in principle.

Cyber Security

We expect all our suppliers to obtain a minimum of Cyber Essentials accreditation or higher to ensure that their own systems and supply chain are as secure as possible.

Prompt Payment

Phoenix is a member of the UK Government Prompt Payment Policy Scheme which advocates:

- 1) Pay suppliers on time, within agreed terms
- 2) Give clear guidance to suppliers on terms, dispute resolution, and prompt notification of late payment
- 3) Support good practice throughout their supply chain by encouraging adoption of the code

Phoenix is also signed up to the Prompt Payment Code which is a voluntary code of practice administered by the Office of the Small Business Commissioner on behalf of BEIS that sets standards for payment practices between organisations of any size and their suppliers. Phoenix has signed the code to show our dedication to driving positive change towards fair payment terms and boosting the economy.

Phoenix expects their supply chain to support their suppliers in line with these guidelines.

Legal Requirements

Suppliers shall identify, monitor, and understand applicable laws, regulations, and customer requirements regarding corporate responsibility. Adequate documentation and records to evidence regulatory compliance and licences to operate shall be in place.

Audits Rights

Phoenix may, at its own expense and in any case no more than once per calendar year, use its own audit process and / or external auditors to assess its supplier's compliance with any of the issues listed in this Supplier Code of Conduct. There shall be a process for correction of responsibility deficiencies identified in audits.

Conclusion

Phoenix requires its suppliers to adhere to the policies as outlined within this Supplier Code of Conduct and commit to promoting and protecting (as far as possible) the human rights of everyone who works for Phoenix and all those who have dealings with the business.

Where it is found that a supplier does not comply with this Code of Conduct, or upon discovery of material and non-justifiable non-compliance and it fails to commit to a plan of action to remedy the same, Phoenix may elect to discontinue the relationship with them.

Version Control

<u>Author</u>	<u>Version</u>	<u>Date</u>	<u>Description</u>
Clare Metcalfe	1.0	19/11/2021	Original Document
Clare Metcalfe	1.1	21/11/2022	Minor changes following annual review

Document Approval

<u>Name</u>	<u>Version</u>	<u>Date</u>	<u>Position</u>
Sam Mudd	1.0	19/11/2021	Managing Director
Clare Metcalfe	1.1	21/11/2022	Operations Director

Signed: *Clare Metcalfe* Clare Metcalfe, Operations Director

Dated: 21/11/2022