

Modern Slavery Statement

Introduction

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Phoenix is absolutely committed to preventing all forms of modern slavery and human trafficking in its corporate activities, and to ensuring that all its supply chains take action to prevent it. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our Statement

This statement is made on behalf of the Group Executive Board and sets out Phoenix's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Our Business

We provide specialist education, residential care, supported living and therapeutic services for children and young adults with complex needs across England and Wales.

We employ over 700 people to provide care and education to over 400 individuals in Schools, Further Education Colleges, Care Homes, and Supported Living. As a provider of education and care services in the UK, we recognise our responsibility to take a robust approach to slavery and human trafficking.

Our Supply Chains

Phoenix procures a wide range of goods and services via a diverse and varied supply chain, including:

- Property related services (construction and maintenance)
- Facilities management services including catering supplies
- Communications and IT equipment services
- Temporary/Agency Workers
- Recruitment agencies in the UK and overseas
- Various professional services
- Office equipment and supplies
- Utilities

Phoenix's actions will:

- Make suppliers and service providers aware that we promote the requirements of the legislation Consider modern slavery factors when making procurement decisions
- Develop awareness of modern slavery issues
- Encourage suppliers and contractors to take their own action to achieve zero tolerance and understand their obligations to eradicate modern slavery within their operations

Our Policies that Relate to Modern Slavery

Phoenix operates several policies that support its approach to the identification of modern slavery risks and the steps we take to prevent slavery and human trafficking in its operations.

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all Team Members (both UK based and overseas) to safeguard against human trafficking or individuals being forced to work against their will. Our recruitment checks are stringent to ensure that we can pick up on any potential issues. These include that each person has a valid Disclosure and Barring Service (DBS) check, that each candidate has the Right to Work in the UK, and that the documents provided to us are legitimate.
2. Whistleblowing policy. We encourage all our Team Members, Customers and other partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Concerns can be raised confidentially and without fear of detriment.
3. Code of Conduct. Our Code makes clear to Team Members the actions and behaviour expected of them. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.
4. Supplier/Procurement Code of Conduct. The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required by Phoenix to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We expect our suppliers to flow these standards through their own supply chains.
5. Contractors Policy. As a regulated provider, and where third-party contractors or agency workers are engaged on Phoenix sites, we require the supplier to confirm DBS and right-to-work checks for those individuals.
6. Safeguarding Policy. Our policy specifies slavery, human trafficking, forced labour and domestic servitude as categories and indicators of abuse.
7. Agency Workers Policy. The organisation occasionally uses Agencies for the supply of temporary workers as well as for the sourcing of permanent Team Members. We use only specified, reputable employment agencies to source labour.

This statement has been approved by the Group Executive Directors of Phoenix Learning & Care Group who will review and update it periodically.

Jon Pain

Chief Executive

Date: 1st September 2025