



# **PHOENIX UK** **MODERN SLAVERY &** **HUMAN TRAFFICKING** **STATEMENT 2025**



**PHOENIX**  
Medical Supplies Limited  
a PHOENIX company



# Introduction

## Foreword by Steve Anderson, Chief Executive Officer, PHOENIX UK

**This statement is produced in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ending 31<sup>st</sup> January 2025.**

PHOENIX UK is committed to creating and safeguarding a non-discriminatory and respectful working environment for all our colleagues, with human rights at the heart of our value chain management. As part of the PHOENIX Group, we are committed to respecting human rights and have recently launched our new Supplier Code of Conduct based on the German Supply Chain and EU Corporate Sustainability Reporting Directive (CSRD) across the PHOENIX Group.

We are determined to ensure human trafficking and slavery does not exist in any part of our organisation, nor within our supply chain or any company of our business partners. As part of our ongoing commitment to human rights, PHOENIX UK has very recently partnered with SEDEX, helping us to evaluate and improve our due diligence processes, providing greater visibility of both our own supply chain as well as those of our business partners.

The UK Board believes that long-term sustainability, with the inclusion and support of our colleagues and business partners, is inextricably linked with social responsibility, economic growth, and environmental accountability.

This statement was approved by the Board on 29<sup>th</sup> July 2025.

# Mission, Values & Vision

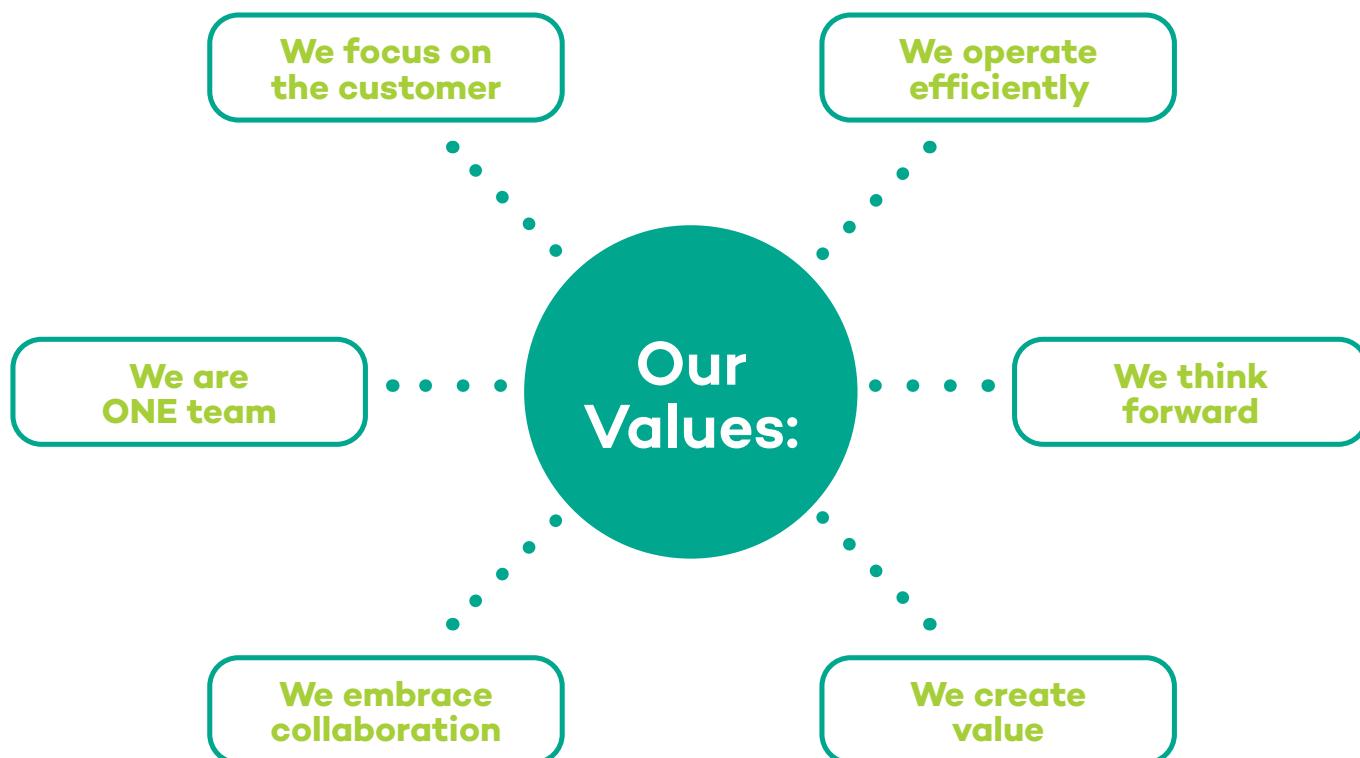
The PHOENIX Group has established the following new mission statement and vision:

## **wePHOENIX Vision:**

We are the partner of choice for simple and direct access to healthcare products and services across Europe.

## **Our Mission:**

We deliver healthcare.



## Our Business

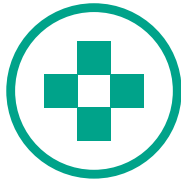
Across Europe, the PHOENIX Group is in 29 countries, it employs approximately 49,000 people and has circa 210 distribution centres with 3,300 own pharmacies in 17 countries. As a family-owned business established in 1881, with its corporate head office based in Mannheim Germany, it is focused on sustainable growth by way of developing and supporting all colleagues which also helps to guarantee the future success of the PHOENIX Group.

PHOENIX UK was established in November 1998 following acquisitions, leading to the incorporation of the UK holding company Phoenix Medical Supplies Ltd, located in Runcorn, Cheshire. PHOENIX UK provides medicine distribution and pharmacy based primary care services. We work in partnership with the NHS, integrated health boards as well as pharmaceutical manufacturers.

PHOENIX UK employs nearly 5,000 people providing support to 30 million patients who visit our 340 owned and over 5,700 member pharmacies, delivering over 250 million packs of medicines each year. It is from our Head Office in Cheshire that many of our business-critical operations are based which support our retail pharmacy and pharmaceutical wholesale throughout the UK.

# Our Companies and Brands

PHOENIX UK comprises of several brands with strong and established reputations across the primary and secondary care sectors:



**PHOENIX**  
Medical Supplies Limited

a PHOENIX company

PHOENIX Medical Supplies Ltd is the lead company of all the PHOENIX UK companies and brands, and is the home to our supporting functions.



**PHOENIX**  
Healthcare Distribution Limited

a PHOENIX company

PHOENIX Healthcare Distribution plays a critical role in the nation's healthcare infrastructure, ensuring medicines are delivered safely and efficiently to primary and secondary healthcare providers throughout the UK.

**PHOENIX**  
Hospital Solutions

a PHOENIX service

PHOENIX Hospital Solutions is our specialised offering within the secondary care sector. Dedicated to meeting the evolving needs of the NHS, we provide innovative services and supply chain solutions designed to enhance operational performance and boost efficiencies for our hospital customers.



a PHOENIX company

Nupharm is responsible for purchasing and importing medicines from various European countries, helping to lower the NHS's pharmaceutical expenses.





Rowlands Pharmacy operate a network of pharmacies located in communities and hospitals throughout the UK. Our community pharmacies offer a variety of services including Pharmacy First, smoking cessation and weight management, supporting the health and wellbeing of the community.



Numark is the UK's fastest-growing community pharmacy membership organisation with over 5,500 members nationwide. We offer our members the professional and commercial support they need to deliver exceptional care to their local communities.



PSUK is the leading supplier of medicines to General Practices in the UK, offering a wide range of professional services, support and products to GPs, hospitals, family planning clinics and dentists.



NuCare collaborates with pharmacies, GPs and nurses to support patients with comprehensive services and products for incontinence, ostomy and wound care.



Hey Pharmacist is our online platform for ordering repeat prescriptions. Designed for customer convenience, it enables patients to manage their repeat medications via an app or the web, with the added benefit of free delivery!

# Our Policies

At a PHOENIX Group level, we have a well-established European-wide compliance strategy with associated processes and policies implemented by local Compliance Managers in each of the 29 European countries in which the PHOENIX Group operates.

Our European-wide Compliance Management System (CMS) was formally audited in January 2024 and awarded the 'Appropriateness Certification' without constraints (standard IDW PS980 [IDWAsS 980(Ewc) (09.2022)]) by Deloitte. **Our CMS has a robust compliance and governance framework, consisting of six key policies:**

- **Compliance Principles, Reporting & Investigations**
- **Code of Conduct**
- **Anti-Corruption**
- **Anti-Money Laundering**
- **Competition Compliance**
- **Sanctions & Embargoes Compliance**

Our Code of Conduct, Anti-Corruption and Competition Compliance policies are readily available on our website at:  
<https://www.phoenixmedical.co.uk/en/our-group/compliance-and-responsibility>



Scan Me

Our recently launched PHOENIX Group Supplier Code of Conduct sets out the minimal standards required to become a PHOENIX Group company supplier. These include specific clauses relating to child and forced labour, fair pay and working hours, unequal treatment, discrimination and harassment, occupational health and safety, freedom of association as well environmental standards, ethical business conduct and our whistleblowing and complaints procedures.

**In addition to our compliance and general procurement policies, we have the following Human Resources (HR) related guidance:**

- **Modern Slavery**
- **Bullying & harassment**
- **Equality & diversity**
- **Grievance**
- **Recruitment & selection**
- **Social & ethical responsibility**
- **Wellbeing**
- **Whistleblowing**

All new and revised policies undergo a strict internal process reviewed by key stakeholders including our Quality Team and Company Secretary prior to any final approval by the PHOENIX UK Board.

The PHOENIX Group also has a policy statement on human rights, which can be found at:  
<https://www.phoenixgroup.eu/en/publications/sustainability-report-downloads>



Scan Me

# Suppliers and Supply Chain

We have various processes within our supply chain in place:

- We expect suppliers to follow our Supplier Code of Conduct and complete the PHOENIX UK Contractor Approval form
- Due diligence standardised processes are performed on all new suppliers when tendering for contracts via value-based assessments using our Business Partner Due Diligence (BPDD) platform, this is detailed later in the statement
- We require automatic inclusion of standard clauses in all company contracts covering sustainability, data protection and compliance clauses, such as our code of conduct, anti-bribery and corruption, and references to anti-slavery and anti-tax evasion
- Potential suppliers who fail to meet requisite due diligence checks are expected to implement remedial compliance measures before they can enter into contract with PHOENIX UK
- Suppliers are obliged to notify PHOENIX UK if they use sub-contractors, and to provide training records if requested

## Suppliers outside EU:

Although some of our goods are imported from within the EU, we do use a supplier of plastic bags and paper bags which are manufactured and supplied by their factories in Malaysia. Regular audits of this supplier are carried out by an external verifier using Sedex Members Ethical Trade Audit (SMETA) procedure and corrective action plan. This examines areas such as labour standards, health and safety, environmental and business ethics. A copy of the report is made available to us as part of the supplier annual audit on request.

## Use of Recruitment Agencies:

Due to the shortage of workers to fill vacancies within our business and particularly in our warehouses, we currently use a variety of recruitment partners. Recruitment agencies, who provide agency or seasonal staff, are subject to our standard internal due diligence checks including our business partner due diligence (BPDD) check. Any agency which fails to comply may be put on stop whilst improvements are made. Continued failure to comply with our requirements will result in a supplier being de-listed and the contract being terminated.





# Due Diligence

Our BPDD platform is a risk management tool which allows the company to conduct automated due diligence checks on prospective business partners, enabling us to identify potential human rights and environmental risks to both our own business units and throughout the supply chain. Risk classification is determined by a multi-stage software-supported process with comparisons against various public databases, such as Companies House. It also includes an in-depth self-assessment compliance and sustainability questionnaire for those prospective business partners deemed to be medium-high risk, with final approval only given by a Board member once all checks have been satisfied.

The PHOENIX Group recently launched a new 24/7 whistleblowing platform at <https://phoenixgroup.integrityline.io/>, which allows both colleagues and external third parties to report anonymously. The company actively encourages the reporting of concerns around actual or suspected slavery and human trafficking violations, together with other compliance and non-compliance matters including:

- **Company policies**
- **Financial misconduct**
- **Data protection breaches**
- **Health and safety**
- **Cybersecurity**
- **Sustainability**
- **Rights & protection of an employee**

Colleagues can also report any concerns via a variety of channels including either via their line manager or local Compliance Manager.

Within our pharmacy business, we also actively promote our 'Speak Up' process, similar to that of NHS England policy and guidance, which provides colleagues with a dedicated Speak Up Guardian to whom they can report any concerns or suspicions.

All reported incidents are monitored and investigated thoroughly by the local Compliance Manager supported by our Corporate Compliance team in accordance with our investigative procedures, company policies and local laws.

We are required to ensure that all cases reported via our whistleblowing portal are formally acknowledged within a set timescale and that a response is provided to the reporter once a case has concluded. All cases are investigated and findings presented with clear action points and subsequent follow up by the Compliance teams to ensure a suitable resolution has been reached. All reported cases are collated and reviewed both at our quarterly Local Compliance Committee and on an annual basis for the PHOENIX Group Executive Board.

There is visibility and input from management by way of committees and working groups which monitor, manage and report on key and emerging risks to the business, including the Management Review Team and Local Compliance Committee which are chaired by a UK Board member. We also have a Sustainability Committee which meets regularly and covers energy, transportation, ethical purchase and CSR matters. Our UK Sustainability Committee is responsible for delivering our group sustainability agenda, which is also chaired by a member of the UK Board.

**Our sustainability agenda focuses on the following key areas:**

- **Climate protection**
- **Recycling of resources**
- **Responsible supply chain: developing processes to integrate human rights and environmental due diligence into our supply chain**
- **Diversity, equal opportunity and inclusion**
- **Social engagement**

Alongside our sustainability agenda, we are in the process of establishing a human rights due diligence process along our supply chain.

As a supplier to the NHS, PHOENIX UK completes an annual NHS Modern Slavery Assessment Tool (MSAT), designed for public sector organisations and their suppliers. This covers questions on a company's business, its processes as well as their actions to manage and mitigate modern slavery risks. Working in partnership with its suppliers, the MSAT tool recommends areas for improvement whilst helping to reduce the risk of exploitation of workers within supply chains. Following completion of our most recent assessment in January this year, PHOENIX UK achieved a low-risk classification.

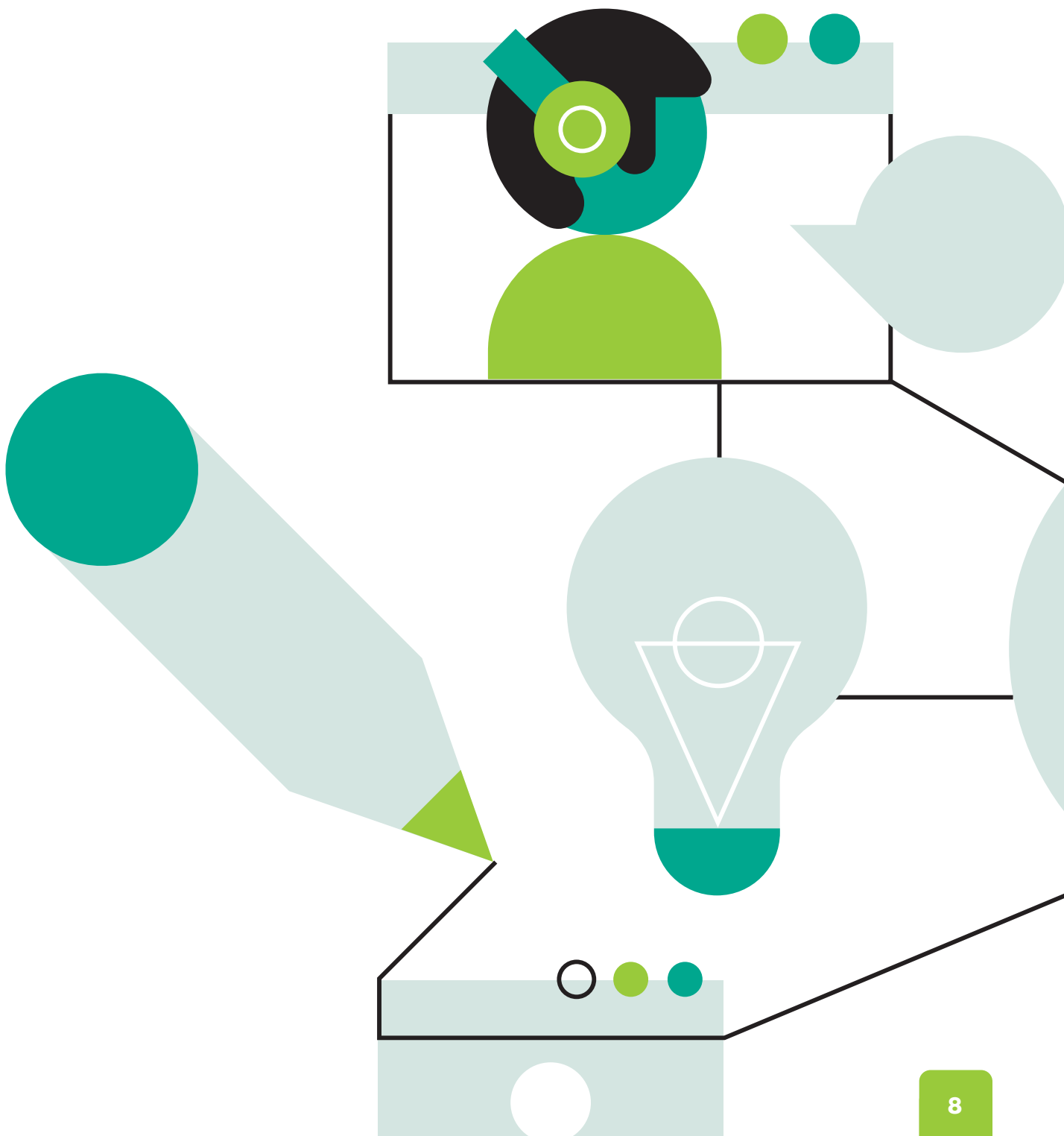


# Training

Colleagues are trained in the principles of our policies and company expectations along with their obligations through mandatory e-learner trainings. Refresher training is provided every 2 years, together with supplementary in-person training for senior management on all aspects of our CMS.

All senior managers and directors are expected to undertake the PHOENIX UK human rights and anti-trafficking e-learner training programme. The course includes an overview of the background to modern slavery, the role of human trafficking in modern slavery, different forms of slavery and how to identify slavery, with a look at the laws and regulations in place to try and combat this issue as well as how to raise concerns. This e-learner course is a mandatory requirement with refresher training every 2 years.

An introductory e-learner course together with a suite of resources regarding the issues around modern slavery and anti-trafficking is also available for all colleagues across PHOENIX UK.



## Next Steps

KPI	Progress	Next Steps
<b>HR Policies &amp; Guidance</b>	We continue to reassess our current HR policies as they apply to modern slavery.	Details of our new whistleblowing portal are to be incorporated into relevant policies.
<b>Training</b>	Last year, PHOENIX UK launched a brand-new compliance e-learner training for all business units, encompassing modules not only on anti-corruption and competition compliance, but also sanctions and embargoes compliance, anti-money laundering and whistleblowing.	Training for all colleagues continues with the introduction of micro-learning later in 2025 to key colleagues on a risk-based approach.
<b>Risk Analysis</b>	Working on the implementation of the German Supply Chain Due Diligence Act 2023 and its reporting requirements.	<p>Despite the postponement of the EU Corporate Sustainability Reporting Directive (CSRD), the PHOENIX Group continues with its preparations.</p> <p>Since 2023, an annual risk analysis of our suppliers has been underway. This risk analysis aims to evaluate human rights and selected environmental related risks of all active suppliers at PHOENIX Group level. Any identified risks are to be assessed and prioritised with a view to implementing mitigation measures where appropriate. The new PHOENIX Group Supplier Code of Conduct is to be implemented locally with the support of the PHOENIX UK Human Rights Officer</p>
<b>Recruitment</b>	We have identified risks within our recruitment processes due to labour shortages, particularly within our wholesale business, and the use of multiple recruitment agencies.	This continues to be reviewed and monitored internally.

**For further assistance, please visit:**

<https://www.phoenixmedical.co.uk/en/contact-us/>

Or, scan the QR code:

