



PHOENIX UK **MODERN SLAVERY &** **HUMAN TRAFFICKING** **STATEMENT 2026**



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 31st January 2026.

PHOENIX UK is committed to fostering a respectful, inclusive, and non-discriminatory working environment for all colleagues, with a strong focus on upholding human rights throughout our value chain. We are dedicated to upholding these principles. We have also recently introduced a new company-wide Code of Conduct for all colleagues—promoting human rights, fairness, and respect.

We are resolute in ensuring that human trafficking and modern slavery have no place within our organisation, our supply chain, or the operations of our business partners. Strengthening this commitment, PHOENIX UK continues to work with SEDEX to enhance our due diligence processes, providing greater transparency and visibility across both our own supply chain and those of our partners.

The UK Board recognises that long-term sustainability is intrinsically linked with social responsibility, economic growth, and environmental stewardship, supported by the active engagement of our colleagues and business partners.

This statement was approved by the Board on 21st July 2026.

Mission, Values & Vision

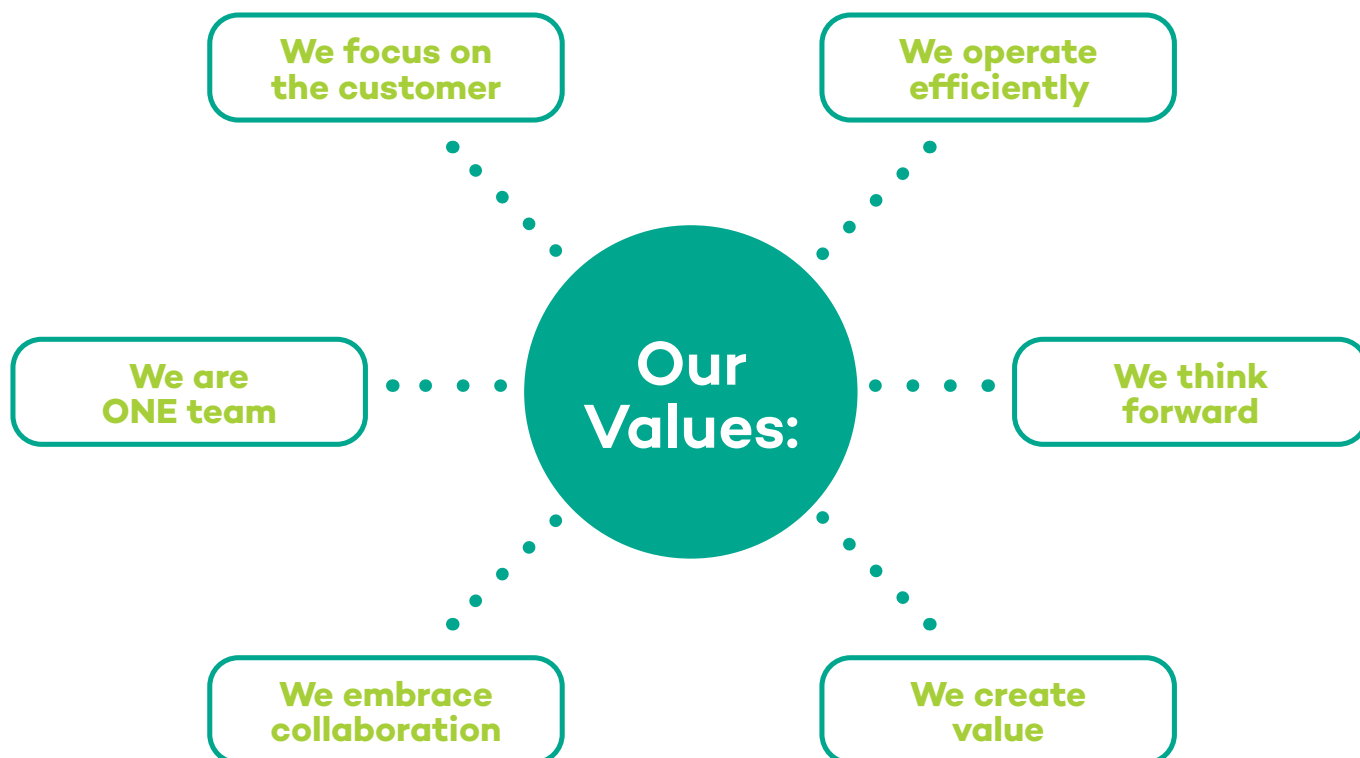
The PHOENIX Group has established the following new mission statement and vision:

wePHOENIX Vision:

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

Our Mission:

We deliver health.



Our Business

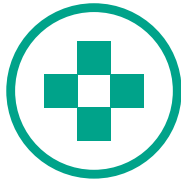
The PHOENIX Group operates in 29 countries across Europe, it employs over 48,000 people and has circa 204 distribution centres with 3,200 own pharmacies in 15 countries. As a family-owned business established in 1881, with its corporate headquarters based in Mannheim Germany, it is focused on sustainable growth by way of developing and supporting all colleagues, which 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 over 5,000 people providing support to 20 million patients who visit our 334 owned pharmacies with over 6,300 member pharmacies. 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 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.



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 improve efficiency 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, blood pressure, travel, health, 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 6,300 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.



The Rowlands Pharmacy App 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 group level, we operate a well-established, Europe-wide compliance strategy, supported by robust processes and policies. These are implemented locally by Compliance Managers across the 29 European countries in which the PHOENIX Group operates.

Our European-wide Compliance Management System (CMS) was formally audited in January 2024 and achieved 'Appropriateness Certification' without qualification (standard IDW PS 980 [IDW AsS 980 (EWC) (09.2022)]) by Deloitte. The CMS is underpinned by a strong compliance and governance framework, built around six core 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>



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Our PHOENIX Group Supplier Code of Conduct outlines the minimal standards expected of all suppliers. These include requirements relating to child and forced labour, fair pay and working hours, non-discrimination and prevention of harassment, occupational health and safety, freedom of association, as well as environmental responsibility, ethical business practices and the operation of effective whistleblowing and complaints procedures.

In addition to compliance and procurement frameworks, we maintain a comprehensive suite of 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 rigorous 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 recently updated its policy statement on its human rights policy reaffirming its commitment to both human rights and environmental protection and which can be found at:

<https://www.phoenixgroup.eu/en/publications/sustainability-report-downloads>

Our approach to managing human rights is based on internationally recognised standards, including those set by the United Nations, (such as the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights), the International Labour Organisation and the OECD.

The PHOENIX Board is responsible for human rights due diligence across the PHOENIX Group, whilst a central team in Corporate Sustainability manages daily activities, working closely with HR and procurement teams as well as local PHOENIX entities. Each country within the PHOENIX Group also has a local Human Rights Officer to provide support and insights.



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Suppliers and Supply Chain

We have a range of processes to support responsible management of our supply chain:

- **We expect suppliers to follow our Supplier Code of Conduct and complete the PHOENIX UK Contractor Approval form.**
- **Standardised due diligence processes are performed on all new suppliers. These include value-based assessments conducted using our Business Partner Due Diligence (BPDD) platform.**
- **Our contracts include mandatory standard clauses covering, data protection, and compliance requirements. These incorporate obligations relating to our Supplier Code of Conduct, anti-bribery and corruption, and commitments addressing modern slavery and the prevention of tax evasion.**
- **Potential suppliers who fail to meet requisite due diligence checks are expected to implement remedial compliance measures before entering into a contractual relationship with PHOENIX UK.**

Suppliers outside the EU:

Although some of our goods are imported from within the EU, we do use a supplier of plastic 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's annual audit on request.

Use of Recruitment Agencies:

We engage a range of recruitment partners to support our workforce requirements. Recruitment agencies providing temporary or seasonal staff are subject to our standard internal due diligence processes, including assessment through our Business Partner Due Diligence (BPDD) framework.

Agencies that do not meet our required standards may be temporarily suspended while corrective actions are implemented. Where there is a continued failure to comply with our requirements, this will result in the agency being removed from our approved supplier list and the termination of the contractual relationship.





Due Diligence

Our BPDD platform is a comprehensive risk management tool which enables the company to conduct automated due diligence checks on prospective business partners. It supports the identification of potential human rights and environmental risks both within our own business operations and across the wider supply chain. Risk classification is determined by a multi-stage software-driven process that incorporates cross-checks against a range of publicly available 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-to-high risk, with final approval only given by a Board member once all checks have been completed.

Prospective suppliers are also expected to adhere to our Supplier Code of Conduct which includes references prohibiting child and forced labour, unequal treatment, discrimination and harassment whilst promoting fair pay, working hours, environmental protection and ethical business conduct.

Our company-wide 24/7 whistleblowing platform at <https://phoenixgroup.integrityline.io/>, 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**
- **Employee rights and protection**
- **Environmental concerns**

Colleagues can also raise concerns via a variety of channels, including 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 thoroughly monitored and investigated 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 platform are formally acknowledged within a defined timeframe and that feedback is provided to the reporter upon conclusion of the investigation. Each case is reviewed in detail, with findings documented alongside clear action plans. Compliance teams then oversee follow-up activities to ensure that appropriate and effective resolutions are achieved.

Management oversight is maintained through a number of committees and working groups responsible for monitoring, managing and reporting 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 purchasing and CSR matters. The 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**

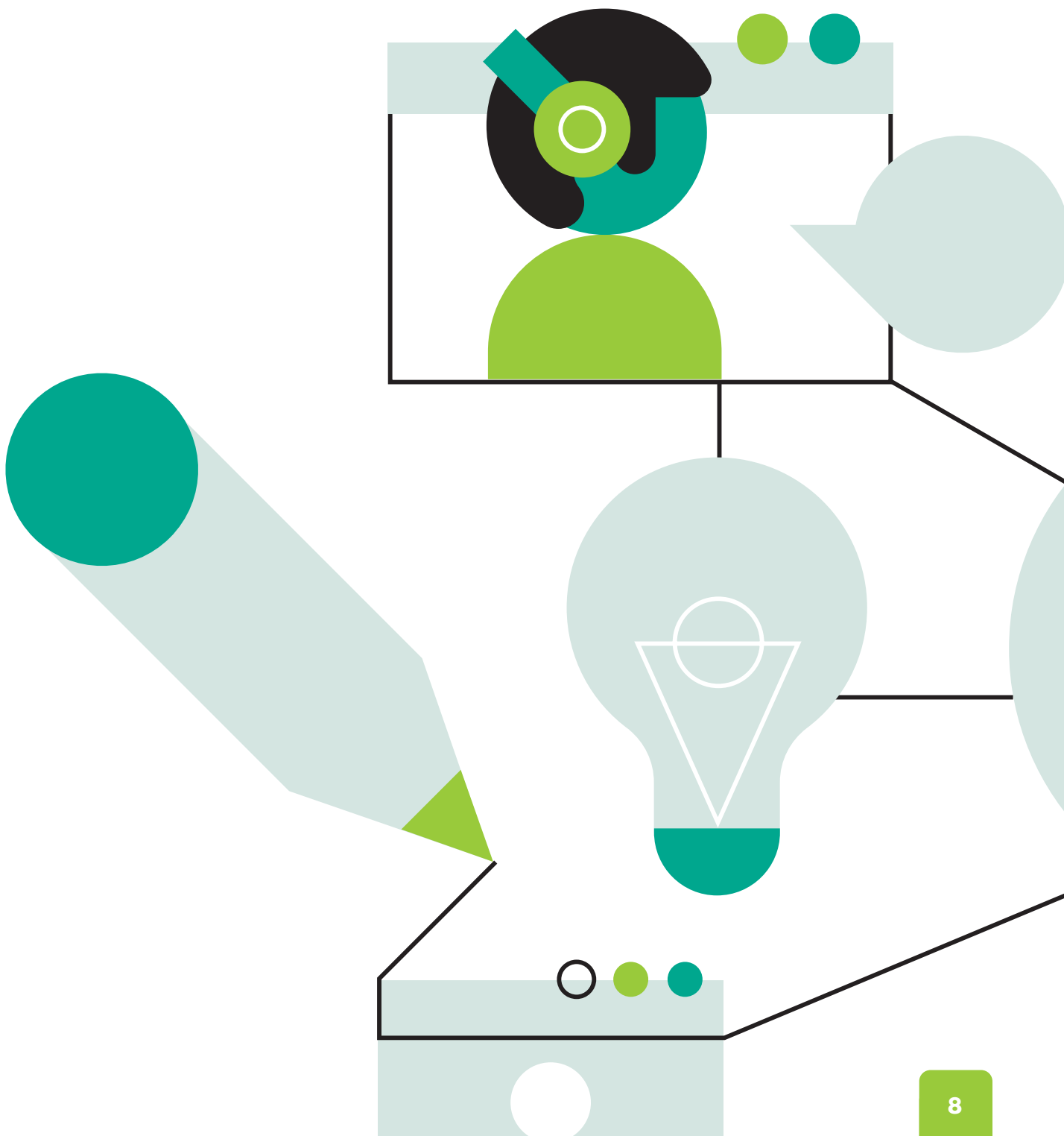
As an NHS supplier, we complete the annual NHS Modern Slavery Assessment Tool (MSAT), designed for public sector organisations and their suppliers. This assessment covers our business operations processes and actions to manage and mitigate modern slavery risks. Working collaboratively with its suppliers, the MSAT tool also identifies areas for improvement and supports efforts to reduce the risk of worker exploitation within supply chains.

Training

Colleagues receive mandatory e-learning training on our policies and company expectations. 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 required to complete the PHOENIX UK human rights and anti-trafficking e-learning training course. The programme covers the background to modern slavery, the role of human trafficking in modern slavery, the 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. Refresher training is mandatory every two years.

An introductory e-learning course together with a suite of resources on modern slavery and anti-trafficking is also available for supporting all colleagues across PHOENIX UK.



Next Steps

KPI	Progress	Next Steps
HR Policies & Guidance	We have recently updated and re-launched both our Whistleblowing and Human Rights policies. We have also implemented our new Supplier Code of Conduct, as part of our due diligence checks and controls.	Our updated policies are to be rolled out and communicated across our business along with the launch of our brand new group-wide Code of Conduct from early July 2026. The new Code of Conduct covers relevant topics such as our principles, vision and commitments to colleagues, customers and business partners, how to raise concerns, workplace ethics, health and safety, environmental protection and information security.
Training	As part of our compliance trainings, we have introduced various micro-e-learning for colleagues including anti-tax evasion and more recently conflicts of interest. In addition, we offer local Human Rights Officers online sustainability training on human rights and business.	Promoting the new company Code of Conduct with a view to possibly devising follow-up training for colleagues.
Risk Analysis	We have successfully implemented the German Supply Chain Due Diligence Act 2023 into our compliance frameworks as part of our reporting obligations.	At corporate level and with the support of our local Sustainability Managers and Human Rights Officers, we are currently working on the forthcoming EU Deforestation Regulation (EUDR), as well as undertaking reviews of the EU Corporate Sustainability Due Diligence Directive (CSDDD) and the EU Forced Labour Regulation (EUFLR) and their compliance requirements.
Recruitment	We have identified risks within our recruitment processes due to labour shortages, particularly within our wholesale business, and the use of multiple recruitment agencies.	We have proactively reduced the number of agencies used and continue to review and monitor the situation.

For further assistance, please visit:

<https://www.phoenixmedical.co.uk/en/phoenix-in-uk/annual-statements-policy-documents-1>

Or, scan the QR code:

