

Modern Slavery Policy

Title	Modern Slavery Policy
Applicable to	All employees and Associates of PHAST, including the chairman and board directors
Date Issued	15 February 2022
Review Date	February 2026
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Approved By	PHAST Board
Date Approved	February 2022
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MODERN SLAVERY POLICY

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere within our own business.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. We expect the same high standards from all of our clients, contractors and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our clients will hold their own workers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including directors, project leaders, members of teams, administration, external consultants, third-party representatives and business partners. This forms part of our associates contract and will be updated as required

Responsibility for the Policy

The chief executive has overall responsibility for ensuring this policy complies with the Board legal and ethical obligations, and that all those under our control comply with it. Strategic directors and project leaders are responsible for ensuring those in their team understand and comply with this policy and are given up to date policy documentation.

Compliance with the policy

All PHAST executive directors, strategic directors, project managers and associates must read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those associated with PHAST in either management of the business or leading projects and managing teams. We are required to avoid any activity that might lead to, or suggest, a breach of this policy. Everyone should notify the Chief Executive as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Everyone is encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with Chief Executive.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform the Chief Executive immediately.

Communication and awareness of this Policy

Our zero-tolerance approach to modern slavery must be communicated to all clients, associates and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Anyone who breaches this policy will face investigation and appropriate actions will then be taken. We will terminate our relationship with individuals and/or organisations working on our behalf if they breach this policy.