

## **Phoenix Spree Deutschland (PSD)- Anti-Slavery and Human Trafficking Policy**

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Forms of Modern slavery may include, but are not limited to, withholding of passports, being forced to work against a person's will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.

Although PSD does not meet the legal criteria requiring the Company to publish a Modern Slavery Statement, we fully support the intentions of the Act and strictly prohibit the use of modern slavery and human trafficking in our and our partners operations and supply chain. We expect that our partners and suppliers will hold themselves and their own suppliers to the same high standards.

Our Anti-Slavery and Human Trafficking Policy sets out PSD's approach to prohibiting slavery as it relates to our business, and sets out guidance as to how PSD should operate. PSD does not itself have an executive function or permanent staff. Accordingly, we have delegated the day to day implementation of the Policy to our key partner, PMM Group (PMM), who acts as the Property Advisor to PSD. PSD will ensure that PMM periodically verifies that it has acted in accordance with this policy.

PMM in turn, out-sources many of its key functions to carefully selected partners who undertake some operations for the company. Although these partners will have their own policies, PMM will ensure that key partners verify periodically that they have acted within this policy.

### **Policy Statement**

We expect everyone working with us or with PMM, or on our or PMM's behalf, to support and uphold the following measures to safeguard against modern slavery:

We have a zero-tolerance approach to modern slavery in our organisation or our partners or supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or PMM, or on our or PMM's behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are, through PMM, committed to engaging with our key suppliers to address the risk of modern slavery in our operations and supply chain. As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour.

### **Policy Application**

PMM supports this policy and it applies to all persons working for them or on their behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

### **Responsibility for the policy and its implementation**

As stated above, the Board of Directors of PSD has approved this policy and has overall responsibility for ensuring compliance. PSD will ensure that PMM periodically verifies that it has acted in accordance with this policy.

PMM Group (PMM), our Property Advisor, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. PMM will ensure that key partners verify periodically that they have acted within this policy.

### **Reporting Modern Slavery**

If anyone has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify as soon as possible PMM's HR Manager; Phone: +44 20 3937 8760; [www.pmmgroup.com](http://www.pmmgroup.com).

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 of our supply chains.

### **Breaches of this policy**

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This Policy has been adopted by the Board and is regularly reviewed and updated.

.....  
Chairman