

# ETHICAL POLICY

Reviewed on: 19<sup>th</sup> July 2023

At Tri Phoenix, we are committed to conducting our business operations with the highest level of integrity, honesty, and social responsibility. As a service provider to clients and service users, we recognise the significance of upholding ethical standards in all aspects of our work. This Ethical Policy serves as a guiding document for our employees, subcontractors, partners, and stakeholders to ensure compliance with ethical principles throughout the tendering process and project execution. We strive to promote trust, transparency, and fairness in our interactions with government agencies and the communities we serve.

## 1. Code of Conduct and Integrity.

At Tri Phoenix, our commitment to upholding a comprehensive Code of Conduct lies at the very heart of our identity as a responsible and trustworthy organisation. This Code serves as a beacon, guiding our employees, subcontractors, partners, and stakeholders to conduct themselves with the utmost integrity, ensuring that our actions reflect the values we hold dear. We firmly believe that ethical behaviour is not an option but a fundamental requirement for building enduring relationships and achieving sustainable success.

### a. Honesty and Truthfulness.

Integrity begins with honesty. We value truthfulness in all our communications and interactions. Our employees and representatives are encouraged to be transparent and forthright, ensuring that information is conveyed accurately and without any distortion.

### b. Integrity in Decision-Making.

Our decisions are guided by the principles of integrity, ensuring that we always act in the best interests of our clients, partners, and stakeholders. We avoid compromising ethical standards for short-term gains and prioritise the long-term trust we seek to establish.

### c. Respect for All Individuals.

We recognise the inherent dignity and worth of every individual, and our interactions are underlined by respect and fairness. Discrimination or harassment based on race, ethnicity, gender, religion, age, disability, or any other characteristic is strictly prohibited.

### d. Compliance with Laws and Regulations.

As a responsible corporate citizen, we are committed to adhering to all applicable laws, regulations, and industry standards. Compliance is not just a legal obligation but an expression of our dedication to operating ethically and responsibly.

### e. Confidentiality and Privacy.

The trust placed in us by our clients, partners, and employees is of paramount importance. We maintain the highest level of confidentiality when handling sensitive information and personal data, abiding by relevant data protection and privacy laws.

### f. Avoiding Conflicts of Interest.

We act with objectivity and impartiality, avoiding situations that may give rise to conflicts of interest. If such conflicts arise, we promptly disclose them and take necessary measures to address them transparently.

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## g. Zero Tolerance for Corruption and Bribery

At Tri Phoenix, we hold ourselves to the highest standard of ethical conduct and have zero tolerance for corruption, bribery, or any form of unethical influence. We refrain from engaging in or tolerating such practices in any aspect of our business.

## h. Promoting Fair Competition.

We believe in fair and healthy competition, adhering to competition laws and regulations. We respect the rights of our competitors while striving to provide innovative solutions and exceptional service to our clients.

## i. Social and Environmental Responsibility.

Our commitment extends beyond financial success; we aim to be a positive force for good in society and the environment. We actively contribute to the well-being of communities, support charitable causes, and implement sustainable practices to protect the planet.

## j. Ensuring Safety and Health.

The safety and well-being of our employees, clients, and stakeholders are paramount. We prioritise health and safety standards, creating a secure working environment and minimising risks in all our operations.

## k. Whistle-blower Protection and Reporting Mechanisms.

We encourage a culture of accountability and openness. Our organisation provides a confidential and secure platform for individuals to report any suspected unethical behaviour or concerns without fear of retaliation. All reports are thoroughly investigated.

## l. Continuous Education and Improvement.

We are committed to continuous learning and improvement. Regular training programs and awareness initiatives are conducted to keep our employees and representatives well-informed about ethical standards and expectations.

By adhering to this Code of Conduct and Integrity, Tri Phoenix establishes a firm ethical foundation for our business practices. We believe that conducting ourselves with honesty, integrity, and respect strengthens our reputation, fosters trust among our stakeholders, and empowers us to make a positive impact on the communities we serve. As ambassadors of ethical behaviour, we are dedicated to living up to these principles, setting an example for the industry and contributing to a more just, sustainable, and responsible world.

## 2. Anti-Corruption and Bribery

At Tri Phoenix, our commitment to combatting corruption and bribery is resolute. We firmly believe that upholding the highest standards of ethical conduct is not only essential for our success but also critical for maintaining the trust and confidence of our clients, partners, and stakeholders. Our Anti-Corruption and Bribery policy serves as a formidable barrier against any attempts to compromise our integrity and ensures that all our business practices remain above reproach.

### a. Zero-Tolerance Stance.

Tri Phoenix maintains a steadfast zero-tolerance policy towards corruption and bribery. We stand firm in our belief that there is no room for compromise when it comes to ethical behaviour. Our employees and representatives are bound by this policy and are expected to act in strict compliance with its principles.

### b. Prohibition of Bribes and Kickbacks.

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We unequivocally prohibit the offering, soliciting, or accepting of bribes, kickbacks, or any other form of unethical influence. This prohibition extends to all aspects of our operations, including the tendering process, project execution, and any dealings with public officials or private entities.

**c. Fair Competition and Ethical Practices.**

Tri Phoenix firmly believes in fair and healthy competition. We compete on the merits of our services and solutions, ensuring that our success is derived from the quality of our offerings rather than any unfair advantages gained through illicit means.

**d. Gifts and Hospitality.**

While we acknowledge that gift-giving and hospitality are customary in certain business cultures, at Tri Phoenix, we exercise caution and prudence to avoid any perception of impropriety. Our employees are guided by strict guidelines regarding the acceptance and offering of gifts or hospitality.

**e. Transparent Business Dealings.**

Transparency is a guiding principle at Tri Phoenix. We ensure that all our business dealings, contracts, and financial transactions are conducted with the utmost clarity and are in full compliance with relevant laws and regulations.

**f. Due Diligence and Partnerships.**

We are diligent in conducting background checks and due diligence on our business partners, suppliers, and subcontractors to ensure that they share our commitment to ethical practices. We choose to collaborate with entities that uphold similar values and adhere to anti-corruption laws.

**g. Reporting and Whistle-blower Protection.**

Tri Phoenix encourages a culture of reporting any suspected instances of corruption or bribery. We provide a secure and confidential reporting mechanism, ensuring that Whistle-blowers are protected from any retaliation for bringing forth legitimate concerns.

**h. Compliance with Anti-Corruption Laws.**

Our Anti-Corruption and Bribery policy is rooted in compliance with all applicable anti-corruption laws and regulations. We stay abreast of changes in legislation and continuously update our policies to reflect evolving best practices.

**i. Leadership Commitment.**

The leadership at Tri Phoenix plays a pivotal role in championing ethical conduct. We lead by example, demonstrating unwavering adherence to the principles of integrity and anti-corruption in all our actions.

**j. Ongoing Training and Awareness.**

We understand that promoting an ethical culture requires constant reinforcement. Thus, we conduct regular training and awareness programs to educate our employees and stakeholders about the dangers of corruption and the significance of ethical practices.

By upholding our Anti-Corruption and Bribery policy, Tri Phoenix reaffirms its commitment to ethical behaviour and responsible business conduct. We believe that adhering to these principles not only safeguards our reputation but also contributes to a level playing field in the marketplace and promotes a sustainable business

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environment. As stewards of integrity, we are steadfast in our determination to uphold the highest ethical standards in all our endeavours.

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### 3. Conflict of Interest.

We take the matter of conflict of interest with utmost seriousness. We are fully committed to identifying and effectively managing any potential conflicts that may arise during our engagements with clients and service users. Maintaining transparency and ensuring that our decision-making processes are free from any bias or undue influence is central to our ethical principles.

#### a. Identification and Disclosure.

Our employees and representatives are well-informed about the significance of identifying and disclosing any situations that may give rise to a conflict of interest. They are encouraged to exercise diligence in recognizing such instances and promptly reporting them through the appropriate channels.

#### b. Comprehensive Definition of Conflict of Interest.

Tri Phoenix has established a comprehensive definition of what constitutes a conflict of interest. This definition encompasses personal, financial, or professional interests that could influence, or appear to influence, an individual's ability to act impartially in the best interests of our clients and the communities we serve.

#### c. Thorough Assessment and Management.

When a potential conflict of interest is disclosed, we conduct a thorough assessment of the situation. We assess the nature and extent of the conflict and its potential impact on the project or decision-making process. Based on this assessment, appropriate measures are taken to manage and mitigate the conflict.

#### d. Objective Decision-Making.

We strive to make decisions that are solely based on merit, without any undue influence from personal interests. By effectively managing conflicts of interest, we maintain the objectivity and fairness that underpins our interactions with clients and service users.

#### e. Clear Guidelines for Resolution.

Tri Phoenix has established clear guidelines and protocols for resolving conflicts of interest. These guidelines provide a structured approach to addressing conflicts and ensure that appropriate actions are taken to safeguard the integrity of our operations.

#### f. Training and Awareness.

We place significant emphasis on educating our employees and representatives about the nuances of conflicts of interest. Regular training and awareness programs are conducted to ensure that everyone is well-versed in identifying, disclosing, and managing potential conflicts.

#### g. Protecting Client Interests.

The interests of our clients and the communities we serve are of paramount importance. We take all necessary steps to avoid any situation that could compromise the trust placed in us and our commitment to delivering objective, client-centric solutions.

#### h. Non-Retaliation and Whistle-blower Protection.

Tri Phoenix fosters a culture where employees and representatives feel

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comfortable coming forward with disclosures. We provide a non-retaliation policy that protects Whistle-blowers from any adverse actions as a result of making legitimate disclosures.

**i. Ongoing Review and Improvement.**

We continually review and update our conflict of interest policies and procedures to align with best practices and changes in the business environment. This ensures that we maintain the highest standards of integrity and governance.

By diligently adhering to our conflict of interest policy, Tri Phoenix strives to uphold its reputation as a trustworthy and responsible service provider. Our commitment to transparency and ethical conduct not only strengthens our relationships with clients and service users but also reinforces our dedication to fostering a fair and equitable society.

**4. Fair Competition.**

At Tri Phoenix, we firmly believe in the principles of fair competition, which lie at the heart of our commitment to ethical business practices. Fair competition is not merely a guiding principle for us; it is an integral part of our corporate ethos that influences every aspect of our operations. We recognise the significance of competing on the merits of our services and solutions, upholding transparency, and respecting the rights of our competitors. Our dedication to fair competition ensures that our success is earned through excellence, innovation, and providing exceptional value to our clients.

**a. Ethical Conduct and Market Integrity.**

Tri Phoenix upholds a culture of ethical conduct, promoting integrity, and fostering an environment of trust in the marketplace. We believe that ethical behaviour is not only an obligation but also a foundation for building enduring relationships with our clients and stakeholders.

**b. Innovation and Excellence.**

In a competitive landscape, innovation and excellence are our driving forces. We continually invest in research, development, and improvement to offer cutting-edge solutions that add value and address the needs of our clients effectively.

**c. Respect for Intellectual Property.**

We respect the intellectual property rights of others and strictly adhere to copyright and patent laws. We refrain from any unauthorised use, reproduction, or distribution of copyrighted material or patented technology.

**d. Transparency in Pricing and Offerings.**

Transparency is a key tenet of fair competition. We ensure that our pricing structures and offerings are clear and easy to understand, providing our clients with the information they need to make informed decisions.

**e. Avoidance of Unfair Practices.**

Tri Phoenix steadfastly avoids engaging in any unfair practices that could provide us with an unfair advantage over our competitors. We compete based on the quality of our services and solutions rather than resorting to deceptive tactics.

**f. Respecting Client Choice.**

We respect the right of our clients to make their own choices in selecting service providers. We do not engage in any form of coercion or undue influence to sway their decisions in our favour.

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**g. Compliance with Competition Laws.**

Tri Phoenix is committed to complying with all applicable competition laws and regulations in the regions where we operate. We maintain a thorough understanding of these laws and strictly adhere to them to ensure a level playing field.

**h. Focus on Customer Satisfaction.**

Customer satisfaction is the ultimate measure of our success. We place our clients' needs and interests at the forefront of our operations, continually striving to exceed their expectations and deliver unparalleled service.

**i. Responsible Marketing and Advertising.**

We ensure that all our marketing and advertising efforts are accurate, truthful, and compliant with relevant regulations. We avoid making false or misleading claims that could deceive our clients or the public.

**j. Continuous Improvement.**

Tri Phoenix is dedicated to continuous improvement and growth. We learn from our experiences and feedback, continually enhancing our services and processes to remain at the forefront of our industry.

By embracing the principles of fair competition, Tri Phoenix demonstrates its commitment to maintaining a healthy, thriving business ecosystem that fosters innovation, encourages creativity, and ultimately benefits our clients and the communities we serve. We are proud to be part of a competitive marketplace where ethical conduct is celebrated, and success is achieved through the value we provide to our clients and the positive impact we create

## **5. Transparency and Accountability.**

At Tri Phoenix, we recognise that transparency and accountability are cornerstones of ethical behaviour and are essential for fostering trust and credibility with our clients, partners, and stakeholders. As a service provider to local government agencies and authorities, we hold ourselves to the highest standards of transparency in all our dealings. We believe in being open and forthright in our financial reporting, decision-making processes, and communication. Furthermore, we take responsibility for our actions and ensure that we are accountable for the outcomes of our projects and initiatives.

**a. Transparent Financial Reporting.**

Financial transparency is of paramount importance at Tri Phoenix. We adhere to rigorous accounting practices and maintain accurate and comprehensive financial records. Our financial reporting is prepared in accordance with relevant accounting principles and regulations, ensuring clarity and reliability.

**b. Open Decision-Making Processes.**

We believe in inclusivity and collaboration when making decisions that impact our clients and stakeholders. Our decision-making processes involve relevant stakeholders, fostering dialogue, and considering diverse perspectives. We are committed to providing explanations for decisions and being receptive to feedback and suggestions.

**c. Accessible Information.**

Transparency also extends to making relevant information accessible to our clients

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and stakeholders. We strive to ensure that important documents, policies, and reports are readily available, empowering interested parties to make informed decisions.

**d. Communication with clients and service users.**

As a service provider to clients and service users, we value effective and transparent communication. We maintain open channels of communication, providing regular updates on project progress, milestones, challenges, and any pertinent information.

**e. Accountability for Results.**

We firmly believe in taking responsibility for the outcomes of our projects and initiatives. We set realistic goals and expectations, and if unforeseen challenges arise, we proactively address them with transparency and integrity.

**f. Learning from Mistakes.**

Transparency and accountability go hand in hand with a culture of learning. If we encounter setbacks or mistakes, we view them as opportunities for improvement. We take ownership of any errors, implement corrective actions, and share the lessons learned with our team and stakeholders.

**g. Compliance and Governance.**

We ensure compliance with all relevant laws, regulations, and contractual obligations. Our commitment to governance is reflected in our adherence to industry standards and best practices.

**h. Client Involvement and Participation.**

We actively involve our clients in the project development process. Through regular meetings and consultations, we encourage our clients to provide feedback, ensuring that their needs and preferences are met.

**i. Transparency in Reporting Project Progress.**

Transparent reporting of project progress is a key component of our engagement with clients and service users. We provide comprehensive progress reports that include updates on milestones, timelines, resource allocation, and any deviations from the original plan.

**j. Internal Culture of Transparency.**

We foster a culture of transparency within our organisation, encouraging open communication, constructive feedback, and sharing of information across all levels of the company.

By upholding transparency and accountability in all aspects of our operations, Tri Phoenix not only reinforces its commitment to ethical behaviour but also demonstrates its dedication to building lasting and trusting relationships with clients, service users and stakeholders. We are proud to stand by our principles and remain transparent in our actions, ensuring that our commitment to ethical behaviour is at the core of everything we do.

**6. Data Protection and Privacy.**

At Tri Phoenix, safeguarding the privacy and security of personal data and confidential information is of utmost importance. As a service provider, we recognise the sensitivity and significance of the data entrusted to us. Our commitment to data protection and privacy is unwavering, and we uphold robust policies and practices that align with relevant laws, including the Data Protection Act and the General Data

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Protection Regulation (GDPR). Our approach to data protection reflects our dedication to ethical conduct, ensuring that our clients' trust remains well-placed.

a. **Stringent Data Security Measures.**

Tri Phoenix employs state-of-the-art data security measures to protect the confidentiality, integrity, and availability of all personal data and confidential information in our possession. We utilize encryption, access controls, firewalls, and secure data storage to prevent unauthorised access and data breaches.

b. **Data Minimisation and Purpose Limitation.**

We strictly adhere to the principles of data minimisation and purpose limitation. We only collect and retain the necessary personal data required for specific, legitimate purposes related to our service provision. Data is never used beyond the stated purposes without explicit consent or lawful justification.

c. **Consent and Data Use Transparency.**

When collecting personal data, we seek informed consent from individuals, ensuring they are aware of the purposes and uses of their data. We are transparent in explaining how data will be processed, and individuals have the right to withdraw their consent at any time.

d. **Data Retention and Deletion.**

Personal data is retained only for as long as necessary to fulfil the intended purposes. Once the retention period expires, or if consent is withdrawn, data is securely and permanently deleted, in accordance with applicable regulations.

e. **Training and Awareness.**

All employees and representatives at Tri Phoenix undergo comprehensive training on data protection and privacy. They are educated about their responsibilities and the importance of handling data with utmost care and confidentiality.

f. **Third-Party Data Processors.**

When engaging third-party data processors, we conduct thorough due diligence to ensure they meet our stringent data protection standards. We have clear agreements in place to hold them accountable for complying with data protection regulations.

g. **Data Subject Rights.**

We respect the rights of data subjects, including the right to access, rectify, erase, restrict processing, and object to the processing of their personal data. We provide easy-to-access mechanisms for individuals to exercise these rights.

h. **Data Breach Incident Response.**

In the unfortunate event of a data breach, Tri Phoenix has well-defined incident response procedures in place. We promptly assess the scope and impact of the breach, take necessary corrective actions, and notify the relevant authorities and affected individuals, as required by law.

i. **Data Protection Officer (DPO).**

To further reinforce our commitment to data protection, Tri Phoenix designates a Data Protection Officer responsible for overseeing and ensuring compliance with data protection policies and regulations.

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## j. Regular Compliance Audits.

Tri Phoenix conducts regular internal audits to assess compliance with data protection policies and practices. These audits help us identify potential areas of improvement and maintain a strong data protection posture.

By prioritising data protection and privacy, Tri Phoenix not only meets legal requirements but also upholds its responsibility as a trusted service provider. We recognise that data protection is a shared responsibility, and we continually strive to enhance our practices to meet evolving industry standards and best practices. Our commitment to data protection reflects our dedication to earning and retaining the trust of Clients and service users and all individuals whose data we handle.

## 7. Responsible Procurement.

At Tri Phoenix, we believe that responsible procurement is not only essential for our own ethical business practices but also critical for ensuring the integrity and sustainability of our supply chain. Our commitment to responsible procurement extends beyond securing cost-effective and high-quality goods and services; it encompasses a thorough evaluation of our suppliers and subcontractors to ensure they share our values and adhere to ethical standards. By embracing responsible procurement practices, we contribute to building a supply chain that is socially responsible, environmentally conscious, and compliant with all relevant laws and regulations.

### a. Supplier Evaluation and Selection.

Tri Phoenix places great importance on the thorough evaluation of potential suppliers and subcontractors. We assess their capabilities, track record, and commitment to ethical practices, ensuring that they align with our values and meet the highest standards of integrity.

### b. Ethical Supplier Code of Conduct.

As part of our responsible procurement strategy, we communicate our expectations to our suppliers and subcontractors through an Ethical Supplier Code of Conduct. This code sets out clear guidelines on ethical behaviour, social responsibility, environmental sustainability, and compliance with all applicable laws and regulations.

### c. Promoting Diversity and Inclusion.

We strive to foster diversity and inclusion in our supply chain by actively seeking suppliers that represent diverse backgrounds, including minority-owned, women-owned, and small and medium-sized enterprises (SMEs). This commitment ensures equal opportunities and contributes to a fair and inclusive business environment.

### d. Sustainable and Environmentally Friendly Practices.

Responsible procurement at Tri Phoenix includes considering the environmental impact of our suppliers and subcontractors. We encourage them to adopt sustainable practices, reduce their carbon footprint, and implement environmentally friendly initiatives.

### e. Labour Practices and Human Rights.

We prioritise suppliers that demonstrate fair labour practices and respect for human rights in their operations. We ensure that they provide safe working conditions, uphold workers' rights, and treat their employees with dignity and respect.

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**f. Avoiding Conflict Minerals.**

Tri Phoenix actively avoids sourcing materials or products containing conflict minerals from regions with a history of human rights abuses. We engage with suppliers to ensure that they are committed to responsible mineral sourcing.

**g. Continuous Supplier Performance Assessment.**

Responsible procurement is an ongoing process. We continuously assess the performance of our suppliers and subcontractors to ensure they maintain compliance with our ethical standards and deliver the expected level of service and quality.

**h. Collaborative Supplier Relationships.**

We foster collaborative relationships with our suppliers and subcontractors, working together to achieve shared sustainability goals and ethical business practices.

**i. Supply Chain Transparency.**

Transparency is fundamental to responsible procurement. We encourage our suppliers and subcontractors to be transparent about their practices, policies, and performance, enabling us to make informed decisions and build trust.

**j. Monitoring and Improvement.**

Tri Phoenix actively monitors the implementation of responsible procurement practices and identifies areas for improvement. We collaborate with our suppliers and subcontractors to drive positive change and uphold ethical standards throughout the supply chain.

By embracing responsible procurement practices, Tri Phoenix ensures that our supply chain remains a reflection of our commitment to ethical behaviour and social responsibility. Our efforts not only strengthen our own operations but also contribute to creating a more sustainable and ethical business environment for our industry and the communities we serve.

## **8. Social and Environmental Responsibility.**

At Tri Phoenix, social and environmental responsibility is deeply ingrained in our corporate philosophy. We recognise that the success of our business is intertwined with the well-being of society and the health of the planet. As a responsible service provider, we are committed to making a positive impact by actively supporting social causes, promoting diversity and inclusion, and minimising our ecological footprint. Our dedication to social and environmental responsibility reflects our belief in being a force for good and contributing to a sustainable future for generations to come.

**a. Supporting Social Causes.**

Tri Phoenix actively engages with local communities, supporting various social causes that align with our values and the needs of the areas we serve. Whether it's supporting educational initiatives, healthcare programs, or community development projects, we are committed to giving back to society.

**b. Promoting Diversity and Inclusion.**

We value the diversity of our workforce and foster an inclusive culture that embraces individuals from diverse backgrounds. We actively seek to create equal opportunities for all, ensuring that our employees are treated with respect and fairness, regardless of their race, gender, ethnicity, religion, or any other characteristic.

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**c. Employee Volunteering and Engagement.**

We encourage our employees to actively participate in volunteering activities that contribute to social causes. Whether it's participating in charity events, mentoring students, or supporting community outreach programs, we empower our team to make a positive impact beyond the scope of their professional roles.

**d. Environmental Stewardship.**

Tri Phoenix is committed to minimising its environmental impact. We implement eco-friendly practices throughout our operations, such as energy conservation, waste reduction, and responsible resource consumption.

**e. Sustainable Solutions and Green Projects.**

We prioritise sustainability in our projects, striving to deliver solutions that have a positive impact on the environment. Whether it's implementing energy-efficient technologies, using eco-friendly materials, or promoting renewable energy, we actively seek opportunities to contribute to a greener future.

**f. Carbon Footprint Reduction.**

Tri Phoenix is dedicated to reducing its carbon footprint. We measure and analyse our emissions, set reduction targets, and implement strategies to achieve them, aligning our actions with international efforts to combat climate change.

**g. Ethical Supply Chain Practices.**

We extend our commitment to social and environmental responsibility to our supply chain. We actively engage with suppliers and subcontractors who share our values and uphold ethical practices, ensuring that our entire ecosystem adheres to responsible standards.

**h. Environmental Awareness and Education.**

We believe in the power of education to drive positive change. As part of our social and environmental responsibility, we engage in awareness campaigns and educational initiatives to promote environmental consciousness among our employees, clients, and communities.

**i. Partnerships with Non-Profit Organisations**

Tri Phoenix collaborates with non-profit organisations and other stakeholders to amplify our impact and address critical social and environmental challenges together.

**j. Continuous Improvement and Reporting.**

Our commitment to social and environmental responsibility is an ongoing journey of improvement. We regularly evaluate our efforts, set new goals, and transparently report on our progress, holding ourselves accountable for making a meaningful difference.

By prioritising social and environmental responsibility, Tri Phoenix aims to be a catalyst for positive change. We believe that businesses have a crucial role to play in shaping a better world, and we are determined to contribute to the well-being of society and the conservation of our planet. Through our actions, we seek to inspire others in our industry and beyond to embrace the values of social responsibility and sustainability for a brighter and more sustainable future.

**9. Whistle-blower Protection.**

At Tri Phoenix, we firmly believe that fostering a culture of integrity and accountability

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requires providing a safe and confidential platform for individuals to report any instances of unethical behaviour or concerns they may encounter. Whistle-blower protection is not just a legal obligation for us; it is an essential part of our commitment to upholding ethical standards and maintaining the trust of our employees, subcontractors, and stakeholders. We recognise the invaluable role Whistle-blowers play in promoting transparency and ensuring the well-being of our organisation, and we take all necessary measures to protect them from any form of retaliation.

a. **Confidential Reporting Mechanism.**

Tri Phoenix has established a confidential reporting mechanism that allows individuals to report unethical behaviour or concerns without fear of exposure or retaliation. We provide multiple channels, such as dedicated hotlines, anonymous email addresses, and secure web portals, to ensure that Whistle-blowers have various options to make their reports.

b. **Protection from Retaliation.**

We take Whistle-blower protection seriously and have implemented stringent policies to safeguard individuals who come forward with reports. Any form of retaliation against Whistle-blowers, whether direct or indirect, is strictly prohibited, and we take immediate action against any individuals found engaging in such conduct.

c. **Independent Investigation.**

Reports made through the Whistle-blower mechanism are taken seriously and treated with the utmost confidentiality. Independent and impartial investigations are conducted to evaluate the validity of the reports, and appropriate actions are taken based on the findings.

d. **Encouraging a Culture of Openness.**

We actively encourage a culture of openness and transparency within our organisation. Our leadership sets an example by valuing and appreciating individuals who raise concerns in good faith, recognizing their contribution to the ethical fabric of our company.

e. **Education and Awareness.**

Regular training programs and awareness initiatives are conducted to educate our employees, subcontractors, and stakeholders about the Whistle-blower protection policy. We ensure that everyone is aware of the mechanisms available to report concerns and the protections provided to Whistle-blowers.

f. **Prompt Response and Communication.**

When a report is received, we respond promptly and acknowledge the receipt of the report to the Whistle-blower. Throughout the investigation process, we communicate updates on the progress and outcome, ensuring transparency in the process.

g. **Anonymous Reporting Option.**

We understand that some individuals may feel more comfortable reporting anonymously. Our reporting mechanisms allow for anonymous reporting, empowering individuals to raise concerns without fear of their identity being revealed.

h. **Continuous Improvement.**

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20 Wenlock Road, London,  
England, England N1 7GU  
Registered in England & Wales  
Company No. 14997110



We continually review and improve our Whistle-blower protection policies and procedures. Feedback from Whistle-blowers and other stakeholders is welcomed and used to enhance our reporting mechanisms and ensure their effectiveness.

**i. Legal Compliance.**

Our Whistle-blower protection policy aligns with all relevant laws and regulations, ensuring that we meet the highest legal standards in safeguarding individuals who report concerns in good faith.

**j. Reinforcing Trust and Integrity.**

By prioritising Whistle-blower protection, Tri Phoenix reinforces its commitment to trust, integrity, and ethical behaviour. We demonstrate that we value and respect the courage and dedication of those who contribute to our ethical culture.

Through robust Whistle-blower protection, Tri Phoenix creates a supportive environment where individuals feel empowered to raise concerns without fear. Our dedication to protecting Whistle-blowers not only strengthens our internal governance but also enhances our reputation as a responsible and trustworthy organisation. We remain steadfast in our commitment to upholding the highest ethical standards and promoting a culture of integrity, accountability, and transparency throughout our operations.

## 10. Continuous Improvement and Training.

At Tri Phoenix, our commitment to ethical practices extends beyond mere compliance; it is a journey of continuous improvement. We firmly believe that fostering a culture of integrity and ethical behaviour requires constant vigilance, education, and reinforcement of our Ethical Policy. We are dedicated to staying at the forefront of ethical standards and best practices, and to achieve this, we prioritise continuous improvement and invest in regular training and awareness programs for all our employees and representatives.

**a. Ethical Policy Review and Updates.**

Tri Phoenix's Ethical Policy is a living document that evolves with the changing landscape of business ethics and relevant regulations. We regularly review and update our policy to ensure its relevance and alignment with the latest industry standards and legal requirements.

**b. Ethics Committee Oversight.**

We have established an Ethics Committee responsible for overseeing the implementation of our Ethical Policy and driving continuous improvement efforts. The committee is composed of senior leaders and representatives from various departments, ensuring a holistic approach to ethical governance.

**c. Ethics Training for New Hires.**

As part of our onboarding process, all new employees and representatives undergo comprehensive ethics training. This training familiarises them with our Ethical Policy, the expectations of ethical conduct, and the mechanisms available for reporting concerns.

**d. Regular Ethical Awareness Programs.**

Tri Phoenix conducts regular awareness programs that reinforce the importance of ethical behaviour. These programs may include workshops, seminars, webinars, and interactive training sessions on various ethical topics.

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# ETHICAL POLICY

Reviewed on: 19<sup>th</sup> July 2023

- e. **Scenario-Based Training.**  
To enhance the practical understanding of ethical dilemmas, we conduct scenario-based training exercises. Through these exercises, employees and representatives are presented with real-life situations and are guided to make ethical decisions.
- f. **Leadership Role Modelling**  
Ethical behaviour starts at the top. Our leadership team plays a crucial role in demonstrating ethical conduct and adherence to our policies. They lead by example, setting the tone for ethical behaviour across the organisation.
- g. **Encouraging Ethical Discussions.**  
We encourage open discussions about ethics and ethical dilemmas within the workplace. Employees are encouraged to seek guidance and share their concerns, promoting a culture of open communication and ethical reflection.
- h. **Ethics Champions.**  
To further promote ethics throughout the organisation, we appoint Ethics Champions who act as advocates for ethical behaviour and serve as points of contact for ethical inquiries and discussions.
- i. **Measuring Ethical Performance.**  
We establish key performance indicators (KPIs) to measure the effectiveness of our ethical initiatives. These metrics help us gauge the impact of our training programs and identify areas for further improvement.
- j. **Feedback and Improvement Loop.**  
We actively seek feedback from employees and representatives regarding our ethical practices and training programs. This feedback loop helps us identify opportunities to enhance our initiatives and ensure they remain relevant and effective.

Through our unwavering commitment to continuous improvement and training, Tri Phoenix ensures that ethical behaviour remains at the core of our organisational culture. We firmly believe that an ethically conscious workforce is the key to building enduring relationships with clients, stakeholders, and the communities we serve. As we embrace this journey of improvement, we remain resolute in upholding our commitment to integrity, transparency, and responsible business practices.

This Ethical Policy represents our steadfast commitment to ethical conduct, and we expect all individuals associated with Tri Phoenix to align their actions with these principles. We believe that by adhering to these ethical standards, we can foster trust and build long-lasting relationships with Clients and service users, enabling us to contribute positively to the communities we serve.

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19<sup>th</sup> July 2023

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