



PhoenixX Human Rights & Modern Slavery Compliance Policy

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Document Classification

This document is a legally binding Human Rights & Modern Slavery Compliance Policy. It defines the human rights responsibilities of PhoenixX in line with international law and governs ethical labor practices across all operations.

Confidentiality Level: Public Legal Document

Applies To: PhoenixX employees, contractors, subcontractors, partner agencies and suppliers

Status: Approved by PhoenixX Compliance & Risk Management

1. Purpose and Legal Effect

This Human Rights & Modern Slavery Compliance Policy ("Policy") establishes PhoenixX's binding commitment to ethical business conduct, the protection of human dignity and the prevention of human rights abuses across all business operations and supply chains. This Policy has legal effect and forms an enforceable condition of engagement for all PhoenixX employees, contractors, subcontractors, partner agencies, service providers and suppliers. Violations of this Policy constitute a material breach and may result in contract termination, blacklisting, evidence reporting and legal enforcement.

2. Scope and Applicability

This Policy applies globally and without exception. It governs labor sourcing, workforce treatment, contracting practices, agency supply chains, outsourcing arrangements and all third-party business relationships. PhoenixX prohibits unethical labor conditions in any geography, regardless of local customs, cost pressures, business incentives or contractual delegation.

3. International Human Rights Standards

PhoenixX aligns with internationally recognized human rights frameworks, including:

- The Universal Declaration of Human Rights (United Nations)



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- The UN Guiding Principles on Business and Human Rights
 - The International Labour Organization (ILO) Fundamental Conventions
 - The OECD Guidelines for Multinational Enterprises
 - The UK Modern Slavery Act 2015
 - The EU Corporate Sustainability Due Diligence Directive (CSDDD)
 - The Swiss Code of Obligations Duty of Care Provisions
- PhoenixX enforces these principles throughout its operational footprint and supply network.

4. Zero-Tolerance for Forced Labor and Modern Slavery

PhoenixX prohibits all forms of modern slavery, including forced labor, bonded labor, involuntary work, contract servitude, prison labor used for commercial outsourcing, or labor acquired under threat, coercion or deception. PhoenixX forbids wage withholding, passport confiscation, movement restrictions or abusive control over workers.

5. Prohibition of Human Trafficking and Exploitation

Human trafficking in any form is strictly forbidden and constitutes a Severe Breach. This includes the recruitment, transport or harboring of individuals through coercion, abuse of power or deceptive practices for purposes of exploitation. PhoenixX prohibits the use of labor sourced through trafficking entities, informal brokers, illegal recruitment networks or forced labor agencies.

6. Ethical Labor Standards

PhoenixX requires fair and ethical labor conditions across all business operations and supply chains. All work must be voluntary and based on transparent agreements. Workers shall not be subject to intimidation, physical or psychological coercion, abusive working conditions, or exploitative labor practices.

7. Fair Compensation and Working Hours

PhoenixX requires suppliers and subcontractors to comply with applicable wage regulations and fair working hour standards. Wage withholding, unlawful fines, excessive deductions, delayed payment schemes or exploitative compensation tactics are prohibited. All workers must be paid in full, on time and in accordance with contractual terms.

8. Prohibition of Child Labor

PhoenixX prohibits the use of child labor in any part of its operations or supply chain. The minimum working age shall comply with ILO Convention 138 and must not be below 18 for any role related to PhoenixX operations. Suppliers engaging in or unable to verify age compliance are subject to immediate contract termination.



9. Safe Working Conditions

PhoenixX requires suppliers to provide safe and hygienic working conditions. Reasonable occupational safety standards, access to personal protective equipment and safe work environments must be guaranteed at all times. Unsafe working conditions constitute a breach of this Policy.

10. Freedom of Movement and Identity Protections

PhoenixX prohibits any practice that restricts worker freedom of movement, including passport or ID confiscation, forced residency, deceptive debt contracts or physical confinement. Workers must retain control of their personal identification and documentation.

11. Non-Retaliation and Worker Protection

PhoenixX enforces a strict non-retaliation policy. Retaliation, threats or penalties against individuals who raise ethical, legal or human rights concerns is prohibited. Suppliers must implement safe reporting channels and ensure worker protection.

12. Labor Agency and Subcontractor Controls

PhoenixX prohibits unethical labor sourcing through unauthorized labor brokers, shadow staffing networks or undeclared workforce channels. Suppliers must disclose all recruitment entities and subcontractors used in PhoenixX-related work. PhoenixX reserves the right to audit recruitment practices and terminate engagements involving unethical labor sourcing, forced recruitment, hidden labor chains or exploitation.

13. Supply Chain Due Diligence

PhoenixX conducts risk-based due diligence on suppliers and subcontractors to detect labor exploitation, trafficking risks and unethical recruitment. Suppliers must provide documentation on workforce sourcing, labor compliance, subcontractor identity, and employment conditions. PhoenixX may refuse or terminate relationships where suppliers fail to complete due diligence verification.

14. Prohibition of Exploitation in AI Data Work

PhoenixX prohibits labor exploitation within AI data operations, including annotation, labeling, data classification, content review and AI moderation work. Suppliers must not use underpaid, coerced or unsafe labor for AI data tasks. PhoenixX rejects unethical crowdsourcing and AI sweatshop models.

15. Cooperation with Authorities

PhoenixX cooperates with enforcement authorities investigating human trafficking, forced labor or labor exploitation. PhoenixX may report violations to INTERPOL, EUROPOL, national labor authorities, human rights enforcement agencies and compliance regulators.

16. Enforcement and Blacklisting

PhoenixX may suspend or terminate contracts and permanently blacklist suppliers involved in unethical labor practices. PhoenixX reserves the right to freeze payments, retain evidence and implement Legal Hold during investigations.



17. Supplier Liability and Indemnification

Suppliers are solely liable for any human rights violations or labor exploitation occurring in their operations or subcontractor chain. PhoenixX shall not be held liable for supplier misconduct. Suppliers must fully indemnify PhoenixX for legal claims, penalties, damages or reputational harm caused by their breach of this Policy.

18. Arbitration and Legal Survival

This Policy is governed by Swiss substantive law. Disputes shall be resolved exclusively through Zurich arbitration under the Swiss Rules. Ethical compliance obligations survive contract termination and remain enforceable. PhoenixX may seek emergency injunctions and evidence preservation.

Approval and Enforcement

This Human Rights & Modern Slavery Compliance Policy – PHX-HR-1.0 is binding upon all PhoenixX business relationships. Ethical sourcing is a mandatory condition of doing business with PhoenixX.

Approved by: PhoenixX Compliance & Risk Management

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