



STATEMENT AGAINST MODERN SLAVERY AND HUMAN TRAFFICKING

Revision	Prepared By:	Reviewed by:	Approved by:	Date
7	Bronwyn Neary HR Manager	Siobhan Lennon HR Advisor	Roisin Daly HR Director	20 th August 2024



Statement against Slavery and Human Trafficking

Page No : 2
Author: Bronwyn Neary
Checked: Siobhan Lennon
Approved: Roisin Daly
Date: 20-08-24

STATEMENT

Circet Ireland and Circet UK (herein referred to as “The Company”) are committed to the principles of the Modern Slavery Act 2015 and has a zero-tolerance approach to modern slavery and human trafficking.

Modern slavery can take different forms such as slavery, servitude, forced and compulsory labor, child labor, and human trafficking, all of which deprive an individual of their liberty by exploiting them for personal or commercial gain. The Company prohibits any employee of or supplier to the company from engaging in any behavior that deprives an individual of their liberty by exploiting them for personal or commercial gain.

This policy applies to all employees of the Company and to all persons working for or on behalf of the Company in any capacity including all employees, directors, officers, agency workers, subcontractors, contractors, external consultants and third party representatives.

OUR COMMITMENT

The Company is committed to acting ethically and with integrity in all our business dealings and relationships and also in the communities in which we work. We are committed to ensuring that all employees of the company and suppliers can carry out their work in an environment that is one of respect, trust and allows every individual to work with dignity. We believe that our work environment is one that encourages confidence in all our employees, that they can speak up about any concerns they may have, without fear in doing so.

The Company will not engage in business with any organization that knowingly supports or is found to be involved in modern slavery and human trafficking.

PREVENTATIVE MEASURES

- I. Providing awareness training on this policy and Anti Corruption Code of Conduct Policy to all employees upon induction,
- II. Verifying that employees involved in the procurement activity are aware of the Modern Slavery Act 2015
- III. Carrying out right to work checks for all prospective employees in the United Kingdom

REPORTING CONCERNS

Any employee who has a concern regarding modern slavery should report it immediately to their Line Manager. A supplier should report it to their Senior Contract Manager or a member of the procurement department or report it via the Company Whistleblowing tool.



Statement against Slavery and Human Trafficking

Page No : 3
Author: Bronwyn Neary
Checked: Siobhan Lennon
Approved: Roisin Daly
Date: 20-08-24

RELATED POLICIES

The following company policies support Circet in mitigating the risks of modern slavery in our business and supply chain. They apply to all Circet Group companies and are available to all employees via our intranet site.

The policies are managed by relevant functional heads such as HR, Procurement, and are imbedded in our company-wide risk management framework.

- **Anti Corruption Code of Conduct:** this policy expects all employees to adhere to the highest standards of personal and professional integrity at all times and to avoid any conduct that might reflect unfavorably upon them, other employees or upon the Company. The Company's business goals are important and demanding but these goals must be achieved honestly and ethically. This policy also facilitates and encourages employees and stakeholders to raise concerns or disclose information, which relates to wrongdoing, illegal practices or unethical conduct, which may come to their attention through work (including concerns that may relate to modern slavery and human trafficking).
- **Bullying and Harassment Policy:** this policy stipulates that Circet has a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment, bullying and all forms of exploitation with a clear procedure to follow for any reported acts or behaviour that goes against our commitments.

These policies and documents will continue to be reviewed on, at minimum, an annual basis.

For further information on the above, please contact a member of the HR department at GroupHR@circet.ie.