

Modern Slavery Policy

Introduction

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. This policy explains CIRQLR's approach to modern slavery and sets out what you should do if you believe that any form of modern slavery is taking place within our business or supply chain. This policy applies to all individuals working for CIRQLR in any form, including agency workers, volunteers, or contractors. It also reflects our expectations of contractors, suppliers and other business partners.

Our policy

CIRQLR has a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We expect the same high standards from all our contractors, suppliers and other business partners, and we will not knowingly engage with organisations involved in modern slavery.

We apply proportionate due diligence when engaging suppliers and partners, including appropriate checks and setting clear contractual expectations. We are committed to ensuring that workers are not exploited, that they are safe, and that relevant employment, health and safety, and human rights laws and standards are adhered to, including freedom of movement and communication. If we believe that these standards are not being met, we will take appropriate action, including notifying the relevant authorities where necessary.

The prevention, detection and reporting of modern slavery in any part of CIRQLR's business or supply chain, whether in the UK or abroad, is the responsibility of everyone working for CIRQLR. You must avoid any activity that may lead to a breach of this policy and should report any concerns immediately to your line manager or a company director.

Overall responsibility for this policy sits with the directors of CIRQLR.

The procedure to follow

If you believe or suspect that a breach of this policy has occurred, is occurring, or may be about to occur, you must report it either by speaking to your manager or by following the whistleblowing policy. You should raise any concerns that you have as soon as possible, provided it is safe to do so.

The guide at the end of this policy provides examples of potential indicators of modern slavery, but there may be other reasons to raise concerns. If you are unsure about whether a particular act, the treatment of workers, or their working conditions constitutes modern slavery, please raise it with your line manager or a company director.

You can also call the Modern Slavery Helpline for advice and guidance on 0800 0121 700.

CIRQLR encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. You will not suffer any detrimental treatment as a result of reporting in good faith a suspicion that modern slavery is taking place in any part of the business or our supply chain.

Potential indicators of modern slavery

The following are examples of potential indicators of modern slavery. This list is not exhaustive and should be used as a guide only.

Appearance

- Is the worker wearing inappropriate clothing for their job?
- Does the worker seem to have noticeably poor personal hygiene?
- Is the worker fearful or unwilling to engage with your organisation?
- Does the worker have few personal possessions and often wear the same clothes?

Identity and legal documents

- Does the worker appear in possession of their own identity documents?
- Are the identity documents provided genuine?

Wages and finances

- Does the worker use a bank account which is also used by other workers?
- Are the bank details in their name?
- Do they appear to have access to their money?

Health

- Does the person have old or serious untreated injuries?
- Do they appear in poor health?
- Do they appear reluctant to speak about how the injuries were caused?
- Does the person look malnourished?

Behaviour

- Is the worker withdrawn or appears frightened?
- Does the worker avoid answering questions?
- Does someone speak on their behalf?
- Is the information they provide inconsistent?
- Do they appear to be under the control of another person?

Address

- Do they know where they live?
- Do they arrive with other workers, perhaps at unusual times?
- Do they share the same address as other workers?

Fear of authorities

- Does the person seem afraid of you helping them or contacting the authorities?