

Modern Slavery Statement

CIRQLR Group Ltd

Financial Year: Year ending 31 December 2026

1. Organisation structure, business and supply chains

This statement constitutes the modern slavery statement for CIRQLR Group Ltd and its subsidiary companies (together, 'CIRQLR'). CIRQLR is a UK-based holding company comprising an integrated network of operating subsidiaries providing waste management, recycling, and environmental services across the UK. These subsidiaries include regional operators such as Castle Environmental, Chambers Waste Management, Cox Skips, Eco Waste & Recycling, Ellgia, KP Waste, Select Environmental, Sommers Waste Solutions, The Recycling Partnership and Wilrose Environmental.

The Group operates nationwide, supporting commercial, industrial and public sector customers through services including waste collection, logistics, recycling, materials recovery and hazardous waste handling. CIRQLR manages significant operational infrastructure, including recycling facilities, transfer stations and vehicle fleets.

Our supply chains include operational delivery partners, logistics providers, and downstream recycling and treatment services, in addition to professional and advisory services. We recognise that these sectors can involve complex supply chains and varying levels of modern slavery risk.

2. Policies in relation to modern slavery

CIRQLR is committed to preventing modern slavery and human trafficking in all aspects of its business and supply chain. We operate a zero-tolerance approach and have a Modern Slavery Policy in place, which is published on our website. This is supported by a culture of ethical business practice, transparency, and accountability.

3. Due diligence processes

CIRQLR applies proportionate due diligence when engaging suppliers and partners. This includes supplier onboarding checks, assessing the suitability and integrity of delivery partners and, where appropriate, incorporating contractual obligations relating to compliance with applicable laws and ethical standards. We set clear expectations that suppliers and partners operate in accordance with applicable labour, human rights, and modern slavery legislation, with ongoing oversight where appropriate.

4. Risk assessment and management

CIRQLR recognises that modern slavery risks may arise within sectors relevant to its operations, including logistics, waste handling, recycling operations and associated supply chains, which may involve higher-risk activities such as manual labour, subcontracting and geographically dispersed operations.

We take a proportionate approach to identifying and managing such risks through supplier selection, oversight, and escalation where concerns arise.

5. Effectiveness

CIRQLR monitors the effectiveness of its approach through:

- Ongoing oversight of supplier and partner relationships

- No reported instances of modern slavery within our operations or supply chain during the reporting period
- Periodic review of policies, controls and risk approach.

We are continuing to develop appropriate measures and indicators to assess the effectiveness of our approach, proportionate to the scale and nature of our operations.

As CIRQLR's operations evolve, we will continue to review and strengthen our approach to supply chain due diligence and risk management.

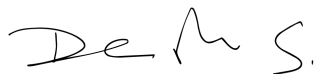
This statement will be reviewed and updated annually in line with the requirements of the Modern Slavery Act 2015.

6. Training

CIRQLR ensures that relevant personnel, including those involved in procurement, supplier management and operational delivery, are aware of modern slavery risks and understand how to identify and report concerns, including through reference to our Modern Slavery Policy.

7. Approval

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Directors of CIRQLR Group Ltd.



Signed:

Name: David Palmer-Jones

Title: Chief Executive Officer

Date: 24 April 2026