



**SCIRIS**

Company no: 12544070

**MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

Version History

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Approved by: Dan Spacie  
Title: Chief Executive Officer

Signature: *Daniel Spacie*  
Date: 24th January 2025

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## Introduction

This statement sets out SCIRIS Group Limited's (herein referred to as "SCIRIS" or "Group") actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Modern slavery is the illegal exploitation of people for personal or commercial gain. It can take many forms such as forced and compulsory labour, servitude, slavery, and trafficking. The UK Modern Slavery Act 2015 was introduced to tackle slavery and human trafficking through the consolidation of previous legislation and the introduction of new measures. It introduces new requirements for organisations' business and supply chains.

## Policy Statement

SCIRIS is committed to acting ethically and with integrity in all our business dealings and relationships, and to this end, is committed to our Modern Slavery Policy. Every supplier and employee working with SCIRIS has the right to live and work with dignity and respect, in decent and safe conditions, and to earn fair rates of pay. We have a responsibility to ensure good social and ethical practices within our own operations and within our supply chain.

SCIRIS does not tolerate any use of slavery, or inaction against slavery within its business, and we require our employees and those providing services to, for, or on behalf of the Group to conduct themselves in accordance with our Policy.

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We are committed to the abolition of working conditions constituting modern slavery, including bonded labour, debt servitude, forced labour, human trafficking, indentured labour, state-imposed forced labour, prison labour, and any form of work performed involuntarily and under the menace of any penalty or coercion through the use of violence and intimidation. We expect contractors and suppliers to respect freedom of association and collective bargaining; to provide a safe, secure, and healthy workplace; and to offer wages and benefits that meet or exceed national legal standards. Our contractors and suppliers should provide workers with whistleblowing mechanisms where grievances related to these topics can be logged confidentially.

Our Modern Slavery Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

## Organisational Structure

SCIRIS operates through various business units under several registered entities across the UK, North America, and Europe. The Group employs more than 250 people across these jurisdictions. The Group has centralised support services, with leadership comprising of the board of directors to provide oversight and governance across the entire organisation.

## Modern Slavery Risk

We believe that the risk of trafficking or modern slavery is very low within our specific business setting as a professional service provider in our operating countries. This is in line with other companies operating in the healthcare communications and consulting sectors. However, the Group takes a proactive view to be vigilant to the risks around modern slavery.

Through due diligence processes, we undertake the following actions to mitigate the risk of modern slavery:

- Identify and assess potential risk areas in our supply chains;
- Where practical, mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Review recruitment processes and employee benefits; and
- Provide whistleblowing channels and protect whistleblowers.

Training on modern slavery and associated procedures is mandatory for all employees of the Group and is completed on an annual basis.

Throughout our business we ensure all terms of employment are voluntary. Where there is a need to source labour from external companies, we only work with reputable employment agencies to do so. Where necessary, we may request demonstrations of compliance with this Policy. We verify the practices of any new agency that we work with and always request evidence of compliance with this Policy through acceptance of our Supplier Code of Conduct.

We are implementing systems and controls to reduce the risk of modern slavery taking place in our supply chains through the development of a consistent supplier procurement process across all group companies. The Group ensures that understanding the potential risk of modern slavery in our supply chain is a critical part of our Policy. As part of this, our businesses are expected to follow procedures in the selection of suppliers. All suppliers are expected to evidence compliance with the Modern Slavery Act as outlined in our Supplier Code of Conduct. We continue to review our suppliers with regard to compliance in this area and are working towards auditing suppliers in line with this Policy.

SCIRIS' main supply chain areas include:

- Recruitment agencies;
- Suppliers of IT equipment, software, and services;
- Professional services from lawyers, accountants, freelancers, consultants, and other advisers;
- Office cleaning and other office facilities services; and
- Print and promotional material production.

#### Responsibility for the Policy

The Human Resources teams have primary and day-to-day responsibility for implementing our Modern Slavery Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal systems and procedures to ensure they are effective in countering modern slavery. All employees are responsible for ensuring that all dealings with suppliers comply with our Policy.

#### Compliance with the Policy

The Group is committed to conducting its business with honesty and integrity, and it expects all staff to maintain high standards at all times. Our Whistleblowing Policy facilitates the reporting of any suspected wrongdoing or dangers in relation to the Group's activities. Our Whistleblowing Policy

provides both an anonymous reporting line and an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace, and we will support any whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken.

#### Review Process

The Human Resources team will review the progress on the Modern Slavery Policy and required training on an annual basis. Key Performance Indicators on this topic are incorporated into our Environmental, Social, and Governance monitoring. Our Modern Slavery Statement is available on the website for all business entities within the Group.

#### Key Performance Indicators

The following KPIs have been agreed for 2025:

- Publication of the Modern Slavery Statement on all group company websites and on the Government Modern Slavery Statement Register.
- Completion of annual Modern Slavery training by 100% of employees.
- Acceptance of all Policies relating to Human Rights and Modern Slavery by 100% of employees.
- Reporting on the number of concerns raised in relation to Human Rights and Modern Slavery.

#### Board Sign off

This statement was approved by the board of SCIRIS Group Limited on **24<sup>th</sup> January 2025** and signed by Dan Spacie, Chief Executive Officer.

*Daniel Spacie*

This statement will be reviewed each year in conjunction with our financial year which runs from 1 January to 31 December.

# SC\_ Modern Slavery Statement\_240125

Final Audit Report


2025-01-24

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