

This document and the information contained herein are the property of Circet Ireland and UK and MUST NOT be reproduced or otherwise disclosed without prior consent in writing. The electronic PDF version of this document (held on the IMS) is the master and deemed to be current. All printed and shared copies are uncontrolled.

Release Date:	17.09.2025	Approved By:	Donagh Kelly
Review Due:	17.09.2026	Signature:	
Reference Standards:	ISO 9001:2015 - Quality Management System		

1. INTRODUCTION FROM THE CEO

- 1.1 We, Circet (UK) Limited and Circet Networks (Ireland) Limited and its relevant subsidiaries (herein referred to as “the **Company**”), are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.
- 1.2 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 and trust and which 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.
- 1.3 Protecting our employees and the workers involved in our supply chain is paramount for our company.

2. ORGANISATION’S STRUCTURE

- 2.1 We are a provider of services in the Telecommunications, Transport Infrastructure, Data Centres and Power Sectors in the UK and Ireland. Circet Europe SAS is our parent company and has its head office in France. The Company has 4888 employees in the UK and Ireland and operates primarily in the UK and Ireland.
- 2.2 The Company has an annual turnover in excess of €800 million.

3. OUR SUPPLY CHAINS

- 3.1 We purchase a vast range of items, from cables to corporate clothing and office services. Some of the products we use in our own business (for our direct labour work and also for use in our office) and others are used by us and our subcontractors as part of the services we provide to our clients
- 3.2 We primarily source our items from the UK and Ireland.

Circet - Internal This document is uncontrolled when printed	Reference:	IMS-POL-618	Version:	1.0
	Created By:	Criona Ryan	Page No:	1 of 4

4. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

- 4.1 We have policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.
- 4.2 This Modern Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships. We also have the following policies in place relevant to modern slavery, which we review annually and update:
- Anti-corruption Code of Conduct^[1]
 - Bullying and harassment policy and procedure^[2]
 - Whistleblowing Procedure^[3]
- 4.3 Please see link here to our integrated report for 2023: [IR CIRCET 2023](#).
- 4.4 The Anticorruption Code of Conduct and Whistleblowing Procedure apply 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.
- 4.5 We also take the following steps:
- 4.5.1 Carrying out right to work checks for all employees to ensure their eligibility to work in the UK.

5. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

- 5.1 We understand that the following areas give rise to the highest modern slavery risks:
- 5.1.1 our supply chain
- 5.1.2 our subcontractors
- 5.2 As part of our initiative to identify and mitigate risk we
- 5.2.1 Include provisions regarding modern slavery and human trafficking in our contracts with suppliers and subcontractors.
- 5.2.2 Our suppliers and subcontractors must comply with our Anti-corruption Code of Conduct.
- 5.3 We also encourage colleagues to raise any concerns about suspected non-compliance via our Company Whistleblowing tool which is open to third parties.

6. FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to put in place a Sustainable Purchasing Policy, roll out training to anyone involved in the procurement activity within the Company to ensure awareness of the Modern Slavery Act 2015 and review what further steps we can take to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 2024. It was approved by the board on 17/09/2025.

Donagh Kelly

CEO

Date: 17 September 2025

This Policy shall be read in conjunction with Anti-corruption Code of Conduct^[1], Bullying and harassment Procedure^[2], Whistleblowing Procedure^[3], UK-PRO-106 Contractor Management^[4] and IRE-PRO-106 Management of Contractors^[5].

Related Documents

The documents below relate to this policy and its requirements.

Reference	Title / Description	Document Location
1	Anti-corruption Code of Conduct	CircetLive: Legal Department
2	Bullying and Harassment Procedure	Handbook 612 IMS Sharepoint
3	Whistleblowing Procedure	CircetLive: Legal Department
4	UK-PRO-106 Contractor Management	Handbook 106 UK Sharepoint
5	IRE-PRO-106 Management of Contractors	Handbook 106 IRE Sharepoint

Version Control

Policy documents shall be reviewed by the author every 12 months.

Version	Release Date	Details of Change(s)	Author	Reviewed By
0.1	17 Sept 25	Approved Document	Criona Ryan	Board of Directors
1.0	17 Sept 25	Transfer to IMS Template	Adele Morrough	Criona Ryan