

Cirrus 1 Ltd Modern Day Slavery Statement

Last reviewed - 19/05/2021

Next review due - 19/05/2022

Guidance

The Act requires each organisation to publish a slavery and human trafficking statement on their website and include a link in a prominent place on its homepage. The purpose of this measure is to increase transparency and it is vital that the statement can be easily accessible by anyone who wants to see it – the public, consumers, employees, NGOs or investors. For organisations with no website, a copy of the statement is to be provided to anyone who requests one in writing. The copy must be provided to the requestor within 30 days of the receipt of the request, where a statement has been produced and is available.

The Act is clear that the link must be in a prominent place on the home page itself. A prominent place may mean a modern slavery link that is directly visible on the home page or part of an obvious drop-down menu on that page. The link should be clearly marked so that the contents are apparent. We recommend a link such as ‘Modern Slavery Act Transparency Statement’.

Organisations are legally required to publish a statement for each financial year of their organisation. Organisations should publish their statement as soon as possible after their financial year end. We expect this to be, at most, within six months of the organisation’s financial year end. Organisations may wish to publish these statements at the same time as they publish other annual accounts.

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This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that **Cirrus 1 Ltd** has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain during the year ending **19/05/2021**. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Cirrus 1 Ltd has a zero-tolerance approach to any form of modern slavery. 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 company or our supply chain.

About **Cirrus 1 Ltd**

The company operates in the technology sector delivering “software as a service” solutions to marketing teams. The work is year-round and indoors.

Organisation Structure:



Goods and services are sourced from the UK and USA.

The supply chain consists of purely digital services and professional services e.g. online software or application developer time.

The business has no direct relationship with trade unions or any other body representing workers.

Responsibilities of Management

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Chief Executive. Directors / Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid modern day slavery practices infiltrating the company. Each manager will ensure that:

- all their staff are aware of the policy and the arrangements, and the reasons for the policy;
- Concerns are dealt with properly, fairly and as quickly as possible;
- proper records are maintained.

Human Resources / Head Office will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic audits.

Responsibilities of Staff

Responsibility for ensuring that the company avoids modern day slavery rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- make themselves aware of, and comply with this policy and arrangements;
- inform their manager if they become aware of any practice or instance that potentially involves exposure to modern day slavery
- Conduct due diligence in all recruitment and contract negotiations.

Policies in relation to slavery and human trafficking

We will:

1. Examine internal business procedures to avoid making demands of suppliers or subcontractors that might lead them to violate human rights, including children's rights. These types of demands include insufficient or late payments, and late orders or high-pressure deadlines resulting from poor demand forecasting.
2. Ensure that zero tolerance for modern slavery and respect for human rights, including children's rights, are built into contracts and represented in dialogue, self-assessment, audits, training and capacity building opportunities for suppliers, subcontractors, customers, and other business partners.

Due diligence processes

Many human rights breaches, including modern slavery, are not immediately apparent. In fact, some suppliers may even go to great lengths to hide the fact that they are using slave labour.

We will:

1. Ask all of our suppliers to provide evidence of compliance to our code of conduct by agreeing to the following statement:

“The contractor warrants that it has thoroughly investigated its labour practices and those of its direct suppliers to ensure that there is no slavery or forced labour used anywhere in its organisation or used in any of its direct suppliers’ or subcontractors’ organisation. The contractor further warrants that it has put in place all necessary processes, procedures, investigations and compliance systems to ensure that the warranties made above will continue to be the case at all times. **Cirrus 1 Ltd** reserves the right to audit your supply chain at any time, with prior notice if it has reason to suspect that the above requirements have not been met.”
2. not knowingly support or deal with any businesses involved in slavery or human trafficking.
3. pay all employees at least the national minimum wage/national living wage (as appropriate, or London Living Wage for London only) currently in operation
4. Ensure our supply chain pay all employees at least the national minimum wage/national living wage (as appropriate, or London Living Wage for London only) currently in operation
5. Assess the physical appearance of candidates or current employees/staff at interview and/or other arranged meetings/appointments; whilst maintaining an awareness of the signs of psychological abuse (i.e. malnourishment, unkemptness, those that appear withdrawn/fearful or who wear the same clothes daily)
6. Record details of persons who do not have, or have difficulty in producing, their own personal identification and/or other documents/records, or have to seek these from other persons;
7. Monitor registered addresses of personnel using electronic systems to ensure employees/staff who have not declared themselves as family or marital/civil or other partners, are not residing at the same address unless a reasonable justification exists.

8. Operate a policy whereby all employees/staff must arrange and discuss their employment/work/assignments/patterns/availability etc. directly with the company themselves, and not through a third party, unless a suitable justification exists.

Risk assessment and management

Vulnerable Populations We employ migrant or low skilled workers	Business Model – We outsource labour management	Product or Service - We provide/ hire service sector workers	Geographies - We source from countries where the rule of law or human rights are weak	We pay wages in cash.
Yes = +20%	Yes = +20%	Yes = +20%	Yes = +20%	Yes = +20%
No = +1%	No = +1%	No = +1%	No = +1%	No = +1%

Total Risk Factor = 24%

Key performance indicators to measure effectiveness of steps being taken

1. Staff turnover
2. Staff progression
3. Personal Development and appraisal meetings
4. Salaries paid electronically to named bank account

Training on modern slavery and trafficking

Briefing sessions will be held for new staff on modern day slavery and equality issues as part of an induction programme. These will be repeated as necessary.

Training will be provided for managers on this policy and the associated arrangements. All managers who have an involvement in the recruitment and selection process will receive specialist training.

Review

The effectiveness of this policy and associated arrangements will be reviewed as part of Financial Year End under the direct supervision of the Company Chief Executive.

Signed by the Director *TBohn*

Print: Tim Bohn

Date: **19/05/2021**