



MODERN SLAVERY STATEMENT

July 2023 – June 2024

Siren Associates' Structure, Business & Supply Chain

Siren Associates is a not-for-profit company managed by a board of four directors which employs close to 100 staff, consultants and subject-matter experts (SMEs) from various nationalities. Siren is registered in the UK (Northern Ireland) and headquartered in Beirut, Lebanon, with operations currently in Jordan and Lebanon. We are a project-based organisation which delivers capacity and capability building interventions funded by various donors, including the EU, the CSSF, the Dutch Ministry of Foreign Affairs, the World Bank and UN agencies.

Siren works in fragile states to improve people's safety, access to justice and freedom to participate fully in the life of society. Our motivation is simple: to help lay the foundations for societies to prosper and for people to realise their full potential. We adopt a social contract-based approach to building prosperous societies, working with our partners to promote responsive and accountable public institutions, political and economic inclusion, and robust state-society and society-society relations. Promoting fair and responsible employment practices to combat modern slavery forms an integral part of this approach.

Our attention to the promotion of human rights and the fair treatment of workers also expands to our partnerships with suppliers and delivery partners. To successfully implement projects, Siren partners with public institutions, civil society organisations and private companies. We work with approximately 20 suppliers, including:

- ICT service providers
- Cleaning and maintenance services
- Building contractors
- Utility service providers
- Furniture and stationery service providers
- Human resources agencies

To ensure that our partners share our values and commitment to ethical business practices and comply with applicable laws and regulations, we have established robust due diligence procedures based on a systematic approach to risk assessment, background checks, compliance policies, and ongoing monitoring.

Modern Slavery Policies and Risk Management

Our policies and procedures in relation to modern slavery and human trafficking are fully documented and endorsed at Board level. Siren strives to prevent slavery and human trafficking through proactive risk management, specific provisions included in our policies, Code of Conduct and Procurement Manual, as well as through clauses included in contracts signed with suppliers. More generally, we recognise and address the issue through our underpinning principles and activities, and by raising awareness among individuals within and beyond our organisation. Our key areas of interest are outlined below.

Human Resources

Siren's Policy on Anti-Modern Slavery and Human Trafficking establishes clear guidelines to protect staff and prevent practices related to modern slavery taking place in the workplace, or as a result of business activity. The policy ensures freedom of workers to terminate employment, freedom of movement and association and provision of access to remedy, compensation, and justice for victims of modern slavery. It also establishes a zero-tolerance policy towards any threat of violence, harassment or intimidation, compulsory overtime, child labour, the use of worker-paid recruitment fees, discrimination, and confiscation of workers' original identification documents.

Our Policy on Recruitment and Selection safeguards employees' rights, ensuring fair recruitment practices and treatment of all staff and potential candidates. This comprehensive policy specifies that the recruitment of employees will be undertaken in a manner which best meets the organisation's needs, international best practices, the labour laws of the local jurisdiction in which the individual is being hired, and the interests of the people applying.

Siren's Code of Conduct and Whistleblowing Policy furthermore encourage staff to come forward and raise good faith concerns of possible misconduct, including suspected incidents of modern slavery and/ or human trafficking – whether committed to or by Siren staff or occurring among Siren's external stakeholders. The Code of Conduct provides that reports will always be treated confidentially and personnel providing information or otherwise assisting in an inquiry or investigation of potential misconduct will be protected against retaliation.

Siren's Code of Conduct and suite of HR policies were last reviewed and updated in March 2023.

Procurement

As a UK-registered company, Siren defaults to UK Government standards and principles. Recognising that procurement is a key risk area, we have embraced the principles set out in the UK Government Commercial Function document "Tackling Modern Slavery in Government Supply Chains". As an organisation focused on international development, we also draw on relevant elements of other guidance (including the UN Guiding Principles and relevant recommendations published by Anti-Slavery International).

Our Procurement Manual specifies that all companies that have been found guilty of human trafficking, forced labour or child labour or other forms of human rights abuses are excluded from participation in procurement procedures. The manual also requires that each invitation to tender is

first risk assessed in terms of the likelihood of modern slavery in contract delivery (a process which may include dialogue with local NGOs or other specialised entities) and that a proportionate approach, informed by this assessment, is followed thereafter. Prior to procurement, Siren therefore conducts an internal analysis, using a tool co-developed with the Monitoring, Research, Evaluation & Learning team, to assess the procurement need from a human rights, gender, and environmental lens. Siren's procurement processes are designed to minimise the risk of modern slavery issues arising – these include setting realistic lead times (we allow at least two weeks to bid) – but also to ensure that any additional burden these may place on potential suppliers are not unnecessarily onerous.

As part of the tendering process, firms are required to sign a statement to the effect that they comply with relevant regulatory frameworks on modern slavery and child labour, such as ILO conventions No. 29, 105, 138 and 182 and the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons. They are also asked to confirm that they do not use or rely on these types of labour and, as far as they are able to establish, nor do their supply chains or any subcontracting arrangements. Depending on the nature of the procurement and the associated identified risk, we may also ask for a description of the recruitment processes for the staff who will be involved in delivering the products or services to which the procurement activity relates, and how the firm exercises due diligence to mitigate against the risk of modern slavery occurring within its sphere of influence. Furthermore, Siren's Code of Conduct outlines the company's expectations for ethical behaviour, sustainability practices and safeguarding measures, and supply chain partners are expected to read, sign, and comply with the code as a precondition to partnering with Siren.

Bidders' responses in relation to their efforts to address modern slavery are examined and rated as part of the bid evaluation process. Depending on the level of risk identified, the requirements made during the tendering process may also form part of the contracting process and require the firm to demonstrate to Siren what activities it undertakes to identify and address modern slavery issues. Our Procurement Manual and Policy on Due Diligence of Third Parties describe this in more detail.

Contract management

Modern slavery risk mitigation also features in our ongoing contract management processes. As our projects may involve collaborating with various suppliers such as construction contractors and maintenance services, we carefully evaluate and monitor our supply chain partners to ensure ethical behaviour. Part of the due diligence process involves regular open-source checks of our suppliers, seeking any information which indicates that they have been convicted, or are suspected, of crimes or offences relating to modern slavery. Moreover, Project Managers perform unannounced visits to construction sites to check for any signs of modern slavery or forced labour. In addition, site visits by non-Siren staff (architects, for example) are used for the same purpose. Although we have not encountered instances of modern slavery to date, we recognise that this aspect of our supply chain poses greater risks and we have due regard for the US Department of State's list of goods considered at higher risk of being produced by children or forced labour.

Furthermore, all our contracts with suppliers provide safeguarding measures against serious misconduct and abuse of vulnerable individuals and include specific clauses designed to mitigate and manage modern slavery risks. These specify that the supplier should investigate and document

all cases, or potential cases, of serious misconduct and take appropriate corrective action to reduce the risk and/or eliminate the misconduct being committed. Contracts signed with suppliers further stipulate that they are expected to comply with all applicable laws, legislation, codes of practice and government guidance in the UK and in the territories where the services are being performed.

All Siren's policies and procedures related to procurement, third party due diligence and contract management were comprehensively reviewed and updated in March 2023.

Siren's Underpinning Principles and Activities

Since 2018, Siren has been a party to the United Nations Global Compact and is committed to implementing the Compact's ten principles as well as the Sustainable Development Goals (SDG). We recognise that sustainable development is not just a moral imperative but also a strategic necessity. Our commitment to universal sustainability principles is rooted in a recognition of the interdependence between our business success, the well-being of people, and the health of the environment. The social dimension of this approach includes a pledge to uphold internationally recognised labour rights and promote ethical employment practices. By adhering to regulatory frameworks such as those outlined by the International Labour Organization and the Ethical Trading Initiative, we prioritise fair treatment, safe working conditions, and the elimination of forced labour within our organisation and throughout our supply chains, thus contributing to building resilient and inclusive societies which are better equipped at tackling the interconnected challenges of environmental protection, social responsibility, and economic sustainability.

We also actively address modern slavery issues through our programmatic activities. For example, stateless people in Lebanon form a vulnerable group at risk of exploitation. Siren has been promoting their right to nationality since 2019 by undertaking field research into the scale and causes of statelessness in Tripoli and Akkar, and since January 2023, in Beirut and Mount Lebanon. This has shone a light on the lived reality of being stateless, and the particular obstacles men, women, girls and boys from different ethnographic groups face in exercising their rights and gaining employment – and the vulnerability to exploitation which accompanies this.

On a corporate level, Siren has progressed recommendations from a Modern Slavery Assessment conducted in June 2022 on the UK Supplier Registration website. This assessment enabled us to identify some of our shortcomings and device concrete steps and objectives to better mitigate the risks of forced labour taking place within our spheres of influence. For instance, in February 2023, Siren delivered mandatory training sessions on Modern Slavery and Child Protection to all its staff. The sessions included definitions, risks, warning signs and information on what to do in case of suspected incidents of forced labour. In March 2023, Siren's comprehensive Anti-Modern Slavery Policy, developed with the external support of Lebanese specialised NGO Kafa, was approved at board level, and made available to all staff. In June of the same year, Siren senior leadership approved a corporate risk register including modern slavery and child labour risks – both within Siren and our supply chain – as well as corresponding mitigation strategies and monitoring

mechanisms. These measures, coupled with clear, confidential and anonymous reporting processes, should help ensure that modern slavery is effectively targeted, regardless of staff turnover or changes in the supply chain.

Finally, to monitor and track our progress in this important area, Siren has designed Key Performance Indicators with a focus on staff awareness and training, active management of modern slavery-related corporate risks, and the impact of revised procurement requirements on suppliers in potential risk supply areas. Siren's Compliance Coordinator is responsible for reporting progress on objectives and KPIs to senior leadership and leads on the development and implementation of effective measures which enable Siren to discharge its legal and ethical responsibilities in relation to this important issue.

Additional Mitigation Measures

Siren operates an ongoing set of processes to embed conflict sensitivity (CS) across the organisation. Conflict sensitivity is mainstreamed in data collection tools and a range of regular and one-off analytical products and resources have been created to help staff grasp and consider relevant conflict dynamics and adjust / focus their programmes accordingly. For instance, in March 2023 a Gender Equality and Social Inclusion (GESI) workshop was delivered by Siren's Corporate RMEL Manager and Strategy & Programme Development Lead to prompt discussions on how to meaningfully integrate social inclusion considerations in our projects in a way that is contextually relevant, locally driven, and beneficial to our partners.

Our CS and GESI activities provide insights into the power relations and interests of different actors, as well as potential conflict dynamics that might be negatively triggered by our programming. To further assess the impact of our interventions, Siren's dedicated conflict sensitivity advisor has supported delivery staff in identifying the risks to project implementation. Importantly, this also develops the ability to recognise potential human rights violations to historically marginalised groups in Lebanon. Siren's work on conflict sensitivity is a first step towards understanding the risks involved in supporting reform in fragile states and an important exercise in identifying and being cognisant of societal groups that may be at heightened risk of being exploited for purposes of forced labour.

Marc Maouad

Chief Executive

September 1, 2023