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# MODERN SLAVERY STATEMENT

June 2024 – June 2025

## Business Structure & Supply Chain

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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. A project-based organisation, Siren delivers capacity and capability building interventions funded by various donors, including the EU, the CSSF, the Dutch Ministry of Foreign Affairs, Global Affairs Canada, the World Bank, and more.

Siren works in fragile states to improve people's safety, access to justice and freedom to participate fully in the life of society. The company's motivation is simple: to help lay the foundations for societies to prosper and for people to realise their full potential. By adopting a social contract-based approach to building prosperous societies, Siren works with its 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.

Attention to the promotion of human rights and the fair treatment of workers also expands to partnerships with suppliers and delivery partners. To successfully implement projects, Siren partners with public institutions, civil society organisations and private companies. The company works 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 partners share comply with applicable laws and regulations and share Siren's values and commitment to ethical business practices, robust due diligence procedures have been established based on a systematic approach to risk assessment, background checks, compliance requirements, and ongoing monitoring.

## Policies and Risk Management

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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 company policies, Code of Conduct, and Procurement Manual, as well as through clauses included in contracts signed with suppliers. More generally, the issue is recognised and addressed through underpinning principles and activities, and by raising awareness among individuals within and beyond the organisation. Key areas of interest are outlined below.

### *Human Resources*

Siren is unwavering in upholding labour rights, seen as a fundamental aspect of its social commitment. Special focus is placed on promoting work-life balance, accommodating staff needs, and offering flexible working arrangements where necessary. For instance, by December 2023, an average of 74% of available annual leave days were taken by staff, and twenty staff members were granted the possibility to work fully remotely. Moreover, during the reporting period, a zero-incident environment regarding safeguarding incidents was maintained, a standard that will be strived to uphold. An open and enabling environment that encourages freedom of expression is fostered through the provision of safe and accessible complaints mechanisms. Complaints are closely monitored and tracked by the Chief Human Resources Officer (CHRO) to ensure timely resolution, and learning is derived from each case to prevent future occurrences and continually foster an inclusive and respectful work culture.

Lastly, all HR policies take a strong stance against unethical labour practices and guarantee staff's right to a safe and fair working environment. Some of these are outlined below:

**The 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.

**The 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.

**The Code of Conduct and Whistleblowing Policy** further 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 by Siren staff or occurring among 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.

The 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, the principles set out in the UK Government Commercial Function document "Tackling Modern Slavery in Government Supply Chains" have been embraced. Working within international development, Siren also draws on relevant elements of other international best practices and guidance (including the UN Guiding Principles and relevant recommendations published by Anti-Slavery International).

**The Procurement Manual** specifies that all companies found guilty of human trafficking, forced labour, child labour, or other forms of human rights abuses are excluded from participation in procurement procedures. 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 a proportionate approach informed by this assessment is followed thereafter. Prior to procurement, an internal analysis is conducted, 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. Procurement processes are designed to minimise the risk of modern slavery issues arising – these include setting realistic lead times (allowing 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, a description of the recruitment processes for the staff 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, may also be requested. Furthermore, the 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.

**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 what activities are undertaken to identify and address modern slavery issues. The Procurement Manual and Policy on Due Diligence of Third Parties describe this in more detail.

### *Contract management*

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

**Furthermore, all 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 policies and procedures related to procurement, third party due diligence, and contract management were comprehensively reviewed and updated in March 2023.

## Underpinning Principles and Activities

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**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). It recognises that sustainable development is not just a moral imperative but also a strategic necessity. Commitment to universal sustainability principles is rooted in a recognition of the interdependence between 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, priority is given to fair treatment, safe working conditions, and the elimination of forced labour within the organisation and throughout the 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.

**Modern slavery issues** are also actively addressed through 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 in Lebanon, and the particular obstacles men, women, girls, and boys from different ethnographic groups face in exercising their rights and in gaining employment – as well as the vulnerability to exploitation which accompanies this.

**On a corporate level**, recommendations from a Modern Slavery Assessment conducted in June 2022 on the UK Supplier Registration website have been progressed. This assessment enabled the identification of some shortcomings and the devising of concrete steps and objectives to better mitigate the risks of forced labour taking place within the company's spheres of influence. For instance, in February 2023, mandatory training sessions on Modern Slavery and Child Protection were delivered to all staff. The trainings include definitions, risks, warning signs, and information on what to do in case of suspected incidents of forced and child labour. During 2023 and 2024, recordings of the sessions continued to be rolled out to staff and all new hires as part of a comprehensive onboarding programme.

Furthermore, the policy and risk management framework established during the last reporting period (June 2022 to June 2023) was further institutionalised through staff awareness-raising and a biannual risk review mechanism. This has allowed for adaptation when faced with a rapidly developing security landscape and for proactivity in efforts to mitigate harm, both within the organisation, among beneficiaries, and in the supply chain. These measures, coupled with clear, confidential, and anonymous reporting processes, help ensure that modern slavery is effectively targeted.

Finally, to monitor and track progress in this important area, Key Performance Indicators (KPIs) have been designed with a focus on staff awareness and training, active management of modern slavery-related risks, and the impact of revised procurement requirements on suppliers in potentially risky supply chains. The Compliance Coordinator is responsible for reporting progress on objectives and KPIs to senior leadership as part of a comprehensive Environmental, Social and Governance (ESG) monitoring and reporting framework. Close cross-departmental collaboration between Compliance, HR, Operations, Procurement, and Finance also takes place to drive the development and implementation of effective measures which enable the company to discharge its legal and ethical responsibilities in relation to combating modern slavery.

## Additional Mitigation Measures

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An ongoing set of processes to embed conflict sensitivity (CS) across the organisation is operated. 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 focus their programmes accordingly. Gender Equality and Social Inclusion (GESI) has also been the topic of a workshop delivered to implementing staff to prompt discussions on how to meaningfully integrate conflict sensitivity considerations in projects in a way that is contextually relevant, locally driven, and beneficial to partners.

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 programming. To further assess the impact of interventions, the 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 our countries of operation. 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.



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Marc Maouad  
Chief Executive Officer  
20 June, 2024