



MODERN SLAVERY STATEMENT

June 2026

Business Structure & 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.

A project-based organisation, Siren delivers capacity and capability building interventions for the public sector and works 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, which also extends to Siren's partnerships with suppliers and contractors. To successfully implement projects, Siren partners with public institutions, civil society organisations and private companies. The organisation 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

Robust due diligence procedures have been established to ensure that partners comply with applicable laws and regulations and share Siren's values and commitment to ethical business practices. These procedures are based on a systematic approach to risk assessment, thorough background checks, compliance requirements, support for improvement and learning, as well as ongoing monitoring and evaluation.

Policies and Risk Management

Siren strives to prevent slavery and human trafficking through proactive risk management at both corporate and project levels, specific provisions included in company policies, Code of Conduct, and the Procurement Manual, as well as through contracts signed with suppliers and partners. Policies and procedures on modern slavery and human trafficking are fully documented and endorsed at Board level. Key policy areas for the prevention of modern slavery are outlined below.

Human Resources

Siren is unwavering in upholding labour rights, considered 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. Siren has maintained a zero-incident safeguarding record; a standard that we strive to uphold. An open and enabling work culture that encourages freedom of expression is fostered through the provision of safe, confidential and accessible reporting mechanisms. Reports are closely monitored by the Chief People and Culture Officer (CPCO), and learning is derived from each case to prevent future occurrences and continue progressing towards 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 policies are outlined below:

The Policy on Anti-Modern Slavery and Human Trafficking establishes clear guidelines to protect staff and prevent modern slavery from happening 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. 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, or confiscation of workers' original identification documents.

The Policy on Recruitment and Selection further safeguards employees' rights, ensuring fair recruitment practices and just treatment of all staff and potential candidates. The Policy sanctions that the recruitment of staff will be undertaken in a manner that best meets the organisation's needs, as well as international best practices, relevant local labour laws, and the interests of the candidates applying.

The Code of Conduct and Whistleblowing Policy complement the above policies by encouraging staff to come forward and raise good faith concerns of possible misconduct, including suspected incidents of modern slavery 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 individuals 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 are currently undergoing a full review and update to ensure full alignment with developing international best practice, local labour laws and applicable regulations.

Procurement

As a UK-registered company, Siren aligns its approach to preventing modern slavery with relevant UK legislation, government policy and procurement guidance. Recognising that procurement and supply chains can present particular risks, Siren takes account of UK Government guidance on tackling modern slavery in supply chains and applies a risk-based approach to due diligence.

Siren also draws on recognised international frameworks and good practice, including the UN Guiding Principles on Business and Human Rights, and relevant guidance published by organisations working to combat modern slavery and human trafficking.

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 likelihood of modern slavery in contract delivery (a process which may include dialogue with local NGOs or other specialised entities). A proportionate approach informed by this assessment is followed thereafter. Prior to contract signature, an internal analysis is conducted, using a tool co-developed with Compliance and the Monitoring, Research, Evaluation & Learning team, to assess the procurement need from a human rights, gender, and environmental lens. Procurement processes are furthermore designed to minimise the risk of modern slavery issues arising – these include setting realistic lead times (allowing at least two weeks to bid) – by ensuring that any additional burden placed on potential suppliers is 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 Nos. 29, 105, 138 and 182 and the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons. They are also asked to confirm that neither they nor their supply chains or partners use or rely on these types of labour. Depending on the nature of the procurement and the identified risk, Siren may request a description of the recruitment processes for staff involved in delivering the products or services to which the procurement activity relates, and clarification on how the firm exercises due diligence to mitigate risks of modern slavery occurring within its sphere of influence. Furthermore, Siren's Code of Conduct – which supply chain partners are expected to read, sign, and comply with – outlines expectations for ethical behaviour, sustainability practices, and safeguarding measures. Suppliers shall ensure that equivalent standards and obligations relating to modern slavery are formally communicated and contractually imposed on all subcontractors and supply chain partners involved in the delivery of goods or services.

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. These may require the firm to demonstrate concrete measures undertaken to identify and address modern slavery risks. Where gaps or weaknesses are identified, Siren may require the implementation of corrective action plans within defined timeframes as a condition for contract award or continuation. 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 (such as architects) 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. 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. Any confirmed instance of modern slavery shall constitute a material breach of contract and may result in immediate termination, without prejudice to any other rights or remedies available to Siren.

All policies and procedures related to procurement, third party due diligence, and contract management were comprehensively reviewed and updated in 2025.

Underpinning Principles and Activities

Beyond Siren's policy framework, efforts to combat modern slavery and human trafficking are underpinned by guiding principles and activities, and by raising awareness among individuals within and beyond the organisation.

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). Siren 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 across Lebanon. This has helped shine 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 and completed. This assessment enabled the identification of some areas of improvement 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, since February 2023, mandatory training on Modern Slavery and Child Protection have been delivered to new hires upon joining and to current staff on an annual basis. The trainings raise awareness around definitions, risks, warning signs, and recognised indicators of forced labour identified by the International Labour Organization (ILO), including abuse of vulnerability, deception, intimidation and threats, withholding of wages, retention of identity documents, and excessive overtime.

Siren's policy and risk management framework has also recently been 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 the work related to modern slavery prevention, Key Performance Indicators (KPIs) and ambitious objectives have been integrated into Siren's wider Environmental, Social and Governance (ESG) framework 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 this 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

Finally, an ongoing set of processes to embed conflict sensitivity (CS) and Gender Equality & Social Inclusion (GESI) across the organisation is in operation. CS principles are integrated into data collection tools, while a variety of analytical products and guidance materials have been developed to enable staff to identify and respond to relevant conflict dynamics. These efforts help ensure that programming does not inadvertently exacerbate tensions but rather contributes to more equitable and peaceful outcomes. Complementing this, workshops on GESI have prompted implementing staff to consider how these principles can be contextually and inclusively embedded in project design and delivery.

This integrated approach not only enhances the relevance and effectiveness of interventions but also plays a critical role in the fight against modern slavery. By addressing structural inequalities, power imbalances, and drivers of vulnerability – such as gender discrimination, marginalisation, and exposure to conflict – CS and GESI frameworks help prevent exploitation and protect at-risk populations from falling into situations of forced labour or human trafficking. 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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