



## **IRARA Anti-Slavery, Modern Slavery and Human Trafficking Statement**

We are committed to the highest level of ethical standards and sound governance and take a zero tolerance approach to slavery, human trafficking and forced labour and demand the same of those we have business relationships with.

This statement covers the financial year ending 31<sup>st</sup> March 2026 and has been approved by the CEO. It will be refreshed annually.

We recognise that modern slavery can occur in various forms, including forced labour, debt bondage, human trafficking, and child exploitation. Our work with vulnerable migrants heightens our responsibility to mitigate these risks.

Although we are a small organisation that currently fall below mandatory reporting thresholds, we voluntarily adopt best practices to uphold human rights and demonstrate transparency. We are committed to continuous improvement and to acting promptly if concerns are identified.

This statement applies to all global employees, contractors and sub-contractors, suppliers and partners involved in our full supply chain of the services we provide.

To date, we have not identified any instances of modern slavery in our organisation or supply chain. We continue to monitor this on a regular basis.

This statement is our annual commitment and review. Further details can be found in our Anti-Slavery Policy.

### **Our Commitments**

IRARA is committed to preventing and combating all forms of modern slavery, forced labour, human trafficking, and child labour within our organisation, in our operations and supply chains. This statement outlines our approach to ensuring ethical practices and compliance with relevant laws across the countries we operate in (these laws are mentioned above).

IRARA maintains several policies to prevent modern slavery. Our recruitment and HR policies and processes are designed to ensure that all prospective employees are legally entitled to work at their work location and to safeguard all employees from coercion or abuse. Other policies include but are not limited to; Code of Conduct, Anti Bribery, Anti Corruption, Anti Money Laundering, Equality and Diversity, Bullying and Harassment, Anti Sexual Harassment, Disciplinary and Grievance policies.

We have a pay framework which ensures that we always remain compliant with the national minimum wage applicable in every country in which we have employees. We also request this of our suppliers.

We provide routes for employees to raise concerns in a confidential and safe way, including via whistleblowing, and will take all concerns seriously and investigate and handle them appropriately.

Key policies are available on our website and reviewed annually. They align with international standards like the UN Guiding Principles and ILO conventions.

We will not enter into business with any organisation which knowingly supports or is found to be involved in any form of slavery, servitude, forced or compulsory labour. We seek assurances from suppliers as to how they prevent modern slavery in their own operations and supply chains.

### Risk Assessment and Management

We conduct annual risk assessments to identify modern slavery risks in our operations and supply chains. These include:

- **Identification:** Map operations, including in local teams and subcontractors in high-risk countries (e.g., those with known forced labour issues).
- **Assessment:** Prioritise risks based on severity (scale, scope, irremediability) and likelihood, using tools like stakeholder consultations, NGO reports, and ILO indicators.
- **Management:** Focus on high-risk areas, such as subcontractor hiring in migrants' origin countries. We engage stakeholders (e.g., NGOs, trade unions) for input.

Risks are documented in an internal register, with actions tracked for continuous improvement.

### Training and Awareness

All staff receive mandatory training on recognising modern slavery indicators and reporting procedures. This forms part of their induction and is then repeated on an annual basis.

Training includes case studies relevant to migrant support, such as exploitation in returnee programmes.

We track completion and effectiveness through feedback.

### Monitoring, Effectiveness, and Reporting

- **Key Performance Indicators (KPIs):** Track metrics like training completion rates, audit findings, grievance numbers, and remediation cases.
- **Annual Review:** The Board reviews effectiveness, updating the policy as needed.
- **Public Reporting:** For UK and Australian operations, this statement will meet statutory formats if thresholds are met in the future.
- **Continuous Improvement:** We benchmark against best practices and engage with initiatives like the UN Global Compact.

### Future Commitments

We will continue to look to improve and strengthen our processes to ensure that modern slavery, human trafficking, forced labour, human rights and labour violations do not take place within our business or anywhere within our supply chain.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act (2015 UK) and aligned with the Corporate Sustainability Due Diligence Directive (CSDDD, Directive EU Regulation 2024/3015) and The Modern Slavery Act (Cth 2018).