

# Irara VZW Anti-Slavery and Modern Slavery Policy

**Effective Date:** 21 October 2025

**Version:** 1.0

**Approved by:** Board of Directors

**Review Date:** 21 October 2026

## 1. Introduction and Commitment

IRARA VZW is committed to preventing and combating all forms of modern slavery, forced labour, human trafficking, and child labour in our operations and supply chains. This policy outlines our approach to ensuring ethical practices and compliance with relevant laws in the UK, EU, and Australia. Although as a small organisation we may fall below mandatory reporting thresholds, we voluntarily adopt best practices to uphold human rights and demonstrate transparency.

This policy aligns with:

- **UK:** Modern Slavery Act 2015 (Section 54 on transparency in supply chains).
- **EU:** Corporate Sustainability Due Diligence Directive (CSDDD, Directive (EU) 2024/1760), which requires due diligence on human rights impacts, including forced labour.
- **Australia:** Modern Slavery Act 2018, focusing on risk assessment and reporting in operations and supply chains.

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.

## 2. Scope

This policy applies to:

- All employees and contractors of IRARA Group, including those in EU, the UK, and Australia.
- Local teams in migrants' countries of origin, whether directly employed or via subcontractors.
- Suppliers, partners, and subcontractors involved in our operations, such as those providing administrative, financial, or resettlement support services.

It covers our entire operations and supply chains, including advances paid to local teams for expenses and payments to returnees.

### 3. Definitions

**Modern Slavery:** Encompasses slavery, servitude, forced or compulsory labour, and human trafficking (as per UK Modern Slavery Act 2015).

**Forced Labour:** Work or service exacted under threat of penalty and not offered voluntarily (ILO Convention No. 29 and 2014 Protocol).

**Child Labour:** Work that deprives children of their childhood, potential, and dignity, or is harmful to their development (ILO Convention No. 138 and No. 182).

**Human Trafficking:** Recruitment, transportation, or harbouring of persons by threat, force, or coercion for exploitation.

**Supply Chains:** Includes direct operations, subsidiaries, and business partners in upstream (e.g., sourcing services) and downstream (e.g., distribution of support) activities.

**IRARA Group:** Includes all IRARA associated businesses, including IRARA Holdings Limited, IRARA vzw, IRARA Services Ltd, IRARA Pty Ltd, IRARA Secure Solutions Ltd, Aldvent Investments Ltd, their subsidiaries or branches.

These definitions draw from international standards, including UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance, and ILO standards.

### 4. Responsibilities

**Board of Directors/Senior Management:** Overall accountability for policy implementation, approval of annual reviews, and ensuring compliance with UK, EU, and Australian laws. In the UK and Australia, statements will be signed by a director or equivalent.

**Compliance Officer (designated in Sheffield office):** Leads risk assessments, due diligence, training, and reporting. Reports to the Board annually.

**Local Team Managers (in countries of origin):** Ensure subcontractors comply with this policy and report any suspected issues.

**All Employees and Contractors:** Must adhere to the policy, report concerns, and participate in training.

**Suppliers and Partners:** Required to confirm adherence via contracts or agreements.

### 5. Policies and Commitments

IRARA maintains the following internal policies to prevent modern slavery:

#### 5.1 Employee Code of Conduct

- All employees receive a written contract compliant with local laws, ensuring fair pay, voluntary employment, and no recruitment fees charged to workers.
- Prohibits compulsory overtime, confiscation of identification documents, threats, harassment, or restrictions on freedom of movement.

- Supports freedom of association, collective bargaining, and access to remedy for grievances.

## 5.2 Supplier and Subcontractor Code of Conduct

- Suppliers must prohibit modern slavery, forced labour, and child labour in their operations.
- Contracts include clauses requiring compliance with this policy, allowing audits and termination for breaches.
- We prioritise suppliers who demonstrate ethical practices and avoid high-risk sectors or regions.

## 5.3 Recruitment Policy

- Recruitment is fair and transparent, prohibiting worker-paid fees (aligned with Employer Pays Principle).
- For migrant or international hires, we verify agents and ensure no debt bondage.

## 5.4 Responsible Sourcing and Purchasing

- We assess purchasing practices to avoid contributing to exploitation, such as through unfair pricing that pressures suppliers.
- Advances to local teams are monitored to prevent misuse that could lead to exploitation.

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

## 6. Risk Assessment and Management

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

- **Identification:** Map operations, including 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.

## 7. Due Diligence Processes

Our due diligence is risk-based and integrated into operations, compliant with CSDDD requirements:

- **Screening:** New suppliers undergo checks for modern slavery risks, including self-assessments and references.
- **Monitoring:** Regular audits or third-party verifications for high-risk partners; on-site visits where feasible.
- **Mitigation:** Develop action plans for identified risks, such as training for subcontractors or contract amendments.
- **Remediation:** If modern slavery is detected, we cease the activity, provide remedy (e.g., compensation, support for victims), and report to authorities if required. Termination of relationships is a last resort, considering impacts on workers.
- **Stakeholder Engagement:** Consult employees, affected communities, and experts (e.g., Anti-Slavery International) in due diligence.

For EU compliance, we address upstream and downstream impacts, excluding disposal activities.

## 8. Training and Awareness

All staff receive mandatory annual training on recognising modern slavery indicators, reporting procedures, and this policy.

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

We track completion and effectiveness through feedback.

## 9. Grievance and Reporting Mechanisms

- **Internal Reporting:** Employees can report concerns confidentially via a hotline or email to the Compliance Officer, with protections against retaliation (aligned with EU Whistleblowing Directive).
- **External Mechanisms:** Accessible to suppliers, returnees, and stakeholders, including anonymous options.

All reports are investigated promptly, with remedial actions taken.

We encourage reporting to external authorities (e.g., UK Modern Slavery Helpline, Australian Federal Police) where appropriate.

## 10. 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:** We publish an annual modern slavery statement on our website, covering steps taken (even if voluntary). For UK and Australian operations, it will meet statutory formats if thresholds are met in future.
- **Continuous Improvement:** We benchmark against best practices and engage with initiatives like the UN Global Compact.

## 11. Breaches and Enforcement

Breaches of this policy may result in disciplinary action, contract termination, or legal referral. We cooperate with authorities on investigations.

## 12. Approval and Contact

This policy is approved by the Board and signed by Jeremy Aldridge, Director.

For questions, contact: Nicola Martin in the Sheffield Office.

IRARA Group commits to upholding this policy and fostering a slavery-free world through our work with returning migrants.