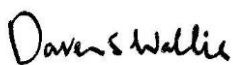


Cirrus Research plc is committed to ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our suppliers hold similar ethos.

Our Anti-slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Quality Management Systems, compliant with the requirements of ISO 9001:2008 and ISO 14001:2004. The implementation and operation of these management systems underlines our commitment to this policy statement.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

A handwritten signature in black ink, appearing to read 'David Wallie'.

Managing Director

14th January 2021

Cirrus Research plc Anti-slavery and Human Trafficking Policy

1. POLICY STATEMENT

1.1 Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

1.2 Cirrus Research plc has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

1.3 We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

1.4 Cirrus Research plc expects our contractors, suppliers and other business partners to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. Cirrus Research plc expect their suppliers to hold these high standards.

1.5 Cirrus Research plc will be in contact with relevant suppliers to ensure they comply with the Modern Slavery Act 2015, In addition to this, to check compliance, we will be auditing our higher risk suppliers, as determined by our predetermined criteria.

1.6 This policy applies to all persons working for, or on behalf of Cirrus Research plc, in any capacity. This includes but does not limit the policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.

1.7 This policy does not form part of any employee's contract of employment and we reserve the right to amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

2.1 The Cirrus Research plc Board of Directors has overall responsibility for ensuring this policy complies with Cirrus' legal and ethical obligations, and that all those under our control comply with it.

2.2 The Cirrus Research plc Finance Manager has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The Quality Manager is responsible for updating the policy to reflect any changes in legislation.

2.3 Management at all levels of Cirrus Research plc are responsible for ensuring those reporting to them understand and comply with this policy, and, are given adequate and regular training on Modern Slavery.

2.4 Cirrus Research plc employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your Line Manager.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 All Cirrus Research plc employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

3.3 You must notify your manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. You can also report any suspected breach by following our Whistleblowing Policy.

3.4 Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage (see 3.3).

3.5 If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any, or all of, the various forms of Modern Slavery outlined in 1.1, follow 3.3.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 This policy is available on the Cirrus Research plc website.

4.2 Modern Slavery training, which includes identifying signs of Modern Slavery and reporting suspicions of Modern Slavery with Cirrus Research plc's supply chains, forms part of the induction process for employees. Refresher training will also be provided as necessary.

4.3 Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the Cirrus' Conduct policy. We may terminate our relationship with other employees, suppliers and any other associates working with Cirrus Research plc if they breach this policy.