



Modern Slavery Statement

For the year ending 31st December 2024

MARCH 2025

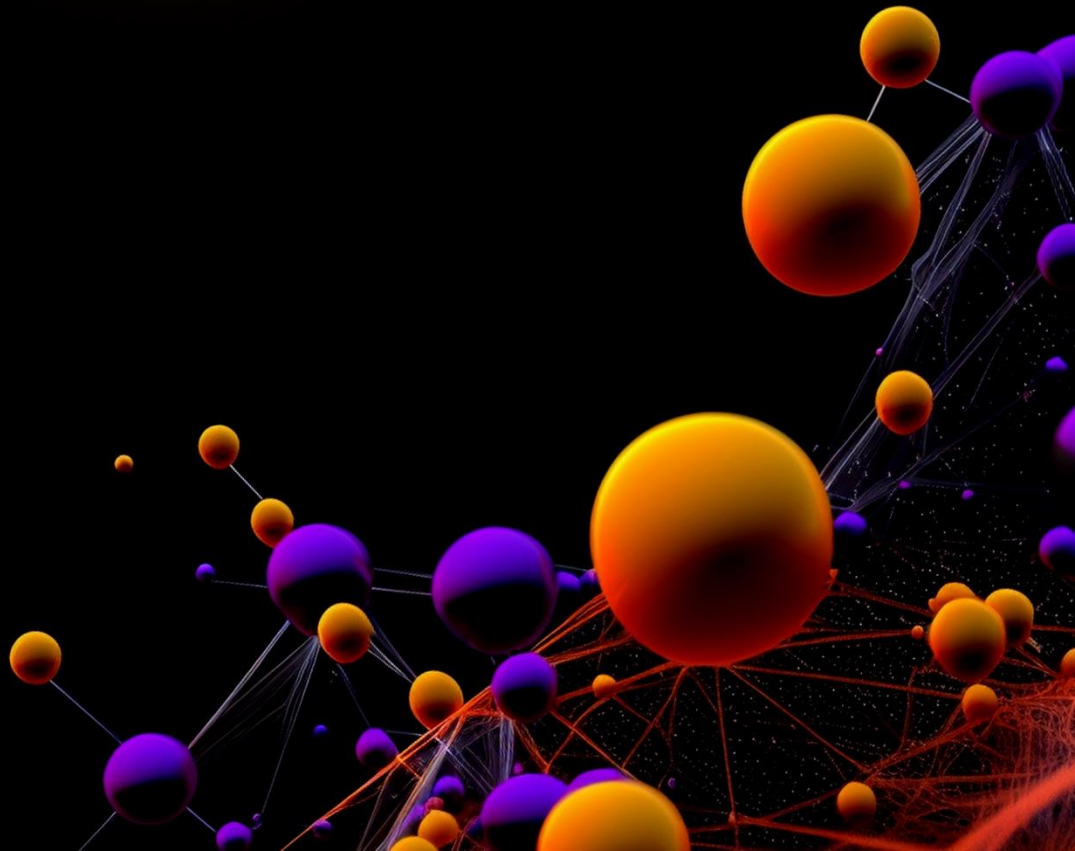


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Circana Modern Slavery Statement

Year ending 31 December 2024 (the "**Reporting Period**")

This Modern Slavery Statement was approved by the Board of Directors on the date shown on page 12.

This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) and is published on behalf of the Circana Group.

The entities covered (the "**Reporting Entities**") by this single joint statement by the **Reporting Entity** are listed on page 12. This statement refers to the financial year ending 31 December 2024 and sets out the steps we have taken to address modern slavery risks in our business and supply chains.

- **Our Business**

Circana is the leading advisor on the complexity of consumer behavior. Through unparalleled technology, advanced analytics, cross-industry data and deep expertise, we provide clarity that helps almost 7,000 of the world's leading brands and retailers take action and unlock business growth. We understand more about the complete consumer, the complete store, and the complete wallet so our clients can go beyond the data to apply insights, ignite innovation, meet consumer demand, and outpace the competition.

The Reporting Period was the first full year of the previously merged entities of Information Resources Inc and the NPD Group operating under the new corporate name of Circana. Key highlights of the Reporting Period were the announcements of various company acquisitions. In November it was announced the CEO, Kirk Perry would retire from his role as President and CEO in the new year but continue to serve as a member of the Circana Board of Directors. The Reporting Entity remains headquartered in Chicago, in the United States and by the end of the Reporting Period had an employee and contractor headcount of around 8900 in wholly owned subsidiaries and affiliates throughout the world. In total we operate in 22 jurisdictions.

The Reporting Entities together currently have over 1500 active suppliers ranging from independent contractors to large multi-national companies. Most suppliers are managed through and by the Reporting Entity with the other Reporting Entities contracting with additional suppliers as and when required at a local level.

“We remain fully committed to ensuring that modern slavery and human trafficking does not occur in any part of Circana or our supply chain.”

Ronnie Kann, Chief Compliance Officer, Circana

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- **Our Supply Chain**

Our supply chain can be divided into the following three broad categories:

- Data and Market Research

As a data driven business, just over two thirds of our supply chain is spent on data licensing or purchasing and consumer panels. The overwhelming majority of this spend is on data received from the largest national supermarkets, wholesalers, petrol stations, pharmacies and convenience stores. These are all large global companies that are household names in the markets we operate. The data relates to regional, store and basket level data and is passed to us directly from the supplying entity.

- Professional services and Utilities

Around 30% of our spend is on professional services, which covers our external auditors, legal advisors, marketing agencies, real estate, recruitment agencies and visa support services. We also include our utility and telecommunications costs within this category. We tend to use local offices of global companies or well established local experts to carry out these services. We also include our intercompany contracts with other entities in the Circana Group within this category.

- Technology

The remaining 3% is spent on our IT hardware and data centers to manage our technology needs.

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- **Modern Slavery Risks In Our Supply Chain**

To assess modern slavery risk, we refer to external data sources (e.g. Alliance 8.7 Global Estimates of Modern Slavery and the US State Department's list of goods produced by child and forced labour), engage with our peers and consult with external experts. To identify the business activities with greater exposure to modern slavery risk, we consider the following factors:

- Reliance on low skilled workforce
- Dangerous or undesirable work
- Presence of migrant workers
- Presence of labor intermediaries
- Offshore production
- Long, complex, or non-transparent supply chains
- Presence of child labor
- Country risks i.e. poverty, conflict, weak enforcement of international human rights standards

As a data and analytics organization, we are not significantly affected by these factors and we consider the risk of modern slavery within our industry to be relatively low. Due to our employees being largely educated or skilled or undertaking work in professional environments where there are established policies and procedures, we believe that the risk of modern slavery in our directly employed workforce is also low.

Despite the overall low risk, we recognize no business is immune from modern slavery. Our exposure to the risk of modern slavery increases when we engage with third parties, particularly in categories such as catering, cleaning, transportation, clothing, packaging and promotional goods suppliers. We are also acutely aware that the Global Slavery Index lists "Electronics" i.e laptops, computers and mobile phones, in its list of products that have an identified risk of forced labor. These increased risks are managed through our policies and procedures as described from page 7 onwards.

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- **Addressing Modern Slavery Risks**

In order to identify and mitigate modern slavery and human trafficking risks, we have adopted a risk-based approach and have put in place processes to:

- Identify and assess potential risk areas in our business and supply chains;
- Monitor potential risk areas in our business and supply chains;
- Mitigate the risk of modern slavery and human trafficking occurring in our business and supply chains; and
- Protect whistle blowers

- **Policies and Procedures**

Through our internal policy on Human Rights and Labour Standards, Circana aligns itself with the principles and guidelines in the United Nations Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact, which reflect our aim of respecting human rights as laid out in the United Nations Guiding Principles on Business and Human Rights.

Our alignment with these principles covers human rights risks related –but not limited to–the following areas: harassment, freedom of association, compulsory labor and human trafficking, child labor and discrimination.

We demonstrate our commitment to human rights and the fair treatment of workers with policies and practices that prohibit human rights abuses in these areas within our organization and our supply chain.

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- Vendor Code of Conduct

We also expect the same standards from our suppliers and contractors. Our [Circana Vendor Code of Conduct](#) obliges our vendors to:

- Conduct their business activities in full compliance with applicable laws and regulations.
- Cooperate with Circana's commitment to a workforce free of harassment and unlawful discrimination
- Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, or prison labor by a Company vendor or its subcontractors is prohibited.
- Comply with all local minimum working age laws and requirements and not utilize child labor.
- Not engage or threaten to engage in physical discipline or abuse.
- Pay living wages under humane conditions and in accordance with applicable laws.
- Not require workers to work more than the maximum hours of daily labor set by applicable laws; ensure that overtime is voluntary and paid in accordance with applicable laws and regulations.
- Keep employee records in accordance with local and national regulations.

It is company policy to work with third-parties to ensure their modern slavery policies are sufficient, but we reserve the right to ultimately terminate the commercial relationship if they cannot demonstrate sufficient commitment to anti-slavery policies.

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- **Due Diligence**

- Recruitment and Employment

We have comprehensive recruitment and onboarding processes and procedures in place, including conducting checks on eligibility to work in the hiring market for all employees. Such checks safeguard against human trafficking or forced labor. Where required by law, all employees have employment contracts in place which are regularly reviewed in line with employment law and best practice.

Our use of recruitment agencies as part of our supply chain is limited. In the Reporting Period all agencies were thoroughly vetted. We only use reputable companies, with whom we either have, or aim to build, long standing arrangements. All staff recruited through an agency are then subject to our standard eligibility to work checks.

- Training

We retain a chapter in the [Circana Code of Conduct](#) entitled "Respect for Human Rights" underlining our commitment to human rights and what we consider our employee responsibilities.

The Circana Code of Conduct is separate from our Supplier Code of Conduct and establishes guidelines and expectations for lawful and ethical conduct by our employees around the world.

Our Code of Conduct includes a section on "Respect for Human Rights" to ensure every employee is aware of and understands our obligations and expectations in this area, and encourages employees to be vigilant in protecting against exploitation of vulnerable populations, human trafficking and child and forced labor. The Circana Code of Conduct is translated into nine languages and all employees are asked to certify annually that they understand and will comply with the Code.

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- Whistleblowing

Our whistleblowing policies - internally referred to as "Speak up No Retaliation" - actively encourage all employees, vendors and anyone connected to our company to speak out if they have concerns about any activity, breach of law, breach of our Code of Conduct, dangers to the public or any concealment of information.

Our whistleblowing policies and procedures were reviewed during the Reporting Period. We continue to maintain a zero tolerance policy regarding any form of retribution or retaliation against a whistleblower.

All reports are expeditiously reviewed and responded to by our Compliance team. Whistleblowing reports can be made in a number of ways internally, such as speaking to a manager, Human Resources or the Compliance team. However, we help ensure it is easy for all employees to speak up and report anonymously by providing a confidential portal and hotlines that are available 24 hours a day, seven days a week and operated by an independent third party.

Members of the public are also encouraged to report any concerns over modern slavery and human trafficking occurring within our business or third parties to us by accessing the portal at www.circana.ethicspoint.com. This portal also contains local phone numbers.

We confirm that no whistleblowing reports have been made concerning modern slavery or human trafficking within the Reporting Period.

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- **Assessing Our Effectiveness**

We review the effectiveness of the measures we take to ensure there is no modern slavery or human trafficking taking place in any part of our business or supply chains. Effectiveness monitoring includes (but is not limited to):

- Monitoring completion rates by employees of the Circana Code of Conduct training
- Reviewing volumes of suppliers that have committed to our Supplier Code of Conduct
- Monitoring our compliance with the UK and Australian Modern Slavery Acts
- Reviewing whistleblowing reports for reports of modern slavery and human trafficking
- Reviewing local adherence to our recruitment and onboarding policies and procedures
- Reviewing human rights risks raised through internal audits and HR reports

- **Consultation Process**

Circana operates through global policies, systems and processes that are designed to be consistently applied across the Group. This statement has been prepared in consultation with our key teams that collaborate to deliver our labor rights risk identification, assessment and management processes for our own operations and supply chain. This includes: Corporate Governance; Procurement, Finance; Human Resources and Legal Compliance. Applicable members of the Circana Group executive teams considered and provided comments on this statement prior to publication. This statement is approved by the directors of the Reporting Entities.

Reporting Entities

This statement applies to Circana, LLC and all entities within the Circana Group of companies as set out below.

Reporting Entity:

Circana, LLC registered at 203 North LaSalle Street, Suite 1500 Chicago, IL 60601

In accordance with the UK Modern Slavery Act 2015, the following Circana entities are included in this statement:

- **Circana (UK) Limited** registered at 54 Portland Place, London, England, W1B 1DY

In accordance with the Australian Modern Slavery Act 2018, the following Circana entities are included in this statement:

- **IRI (APAC Holdings) Pty Ltd**
- **Information Resources (Holdings) Pty Ltd**
- **Circana (AU) Pty Ltd**

all registered at c/- LPO Connect Pty Ltd, Building 3, 320 Lorimer Street, Port Melbourne, VIC 3207 Australia

For more information or to report a concern

If you have a specific question or would like to inform us of modern slavery or human trafficking concerns connected to our business, please email compliance@circana.com.

Alternatively, you may file an anonymous report at www.circana.ethicspoint.com

All reports will be treated confidentially and investigated appropriately.

About Circana

Circana is the leading advisor on the complexity of consumer behavior. Through unparalleled technology, advanced analytics, cross-industry data and deep expertise, we provide clarity that helps almost 7,000 of the world's leading brands and retailers take action and unlock business growth. We understand more about the complete consumer, the complete store, and the complete wallet so our clients can go beyond the data to apply insights, ignite innovation, meet consumer demand, and outpace the competition.

For more information, visit circana.com.