

Modern Slavery Statement

For the year ending December 31, 2025



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Circana Modern Slavery Statement

Year ending December 31, 2025 (the "Reporting Period")

This statement applies to Circana, LLC and all of its subsidiaries and affiliated entities (collectively, "Circana").

United Kingdom and Australian Reporting Entities:

In accordance with the UK Modern Slavery Act 2015, the following Circana entity is 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 three Australian entities are registered at Suite 7.01, Level 7; 11 Khartoum Road; Macquarie Park, NSW 2113.

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.

Circana, LLC remains headquartered in Chicago, in the United States, and by the end of the Reporting Period had an employee and contractor headcount of around 8,900 in wholly owned subsidiaries and affiliates throughout the world. In total we operate in 23 jurisdictions.

Circana currently has over 450 direct suppliers ranging from independent contractors to large multinational companies. Most suppliers are managed through and by Circana, LLC, with subsidiaries and affiliated entities contracting with additional suppliers as and when required at a local level.

Applying Core Behaviors to Anti-Slavery

Circana's approach to addressing modern slavery reflects a broader commitment to ethical business practices, responsible governance, and respect for human rights. Our [Core Behaviors](#) provide a strong framework to guide how modern slavery risks are considered and managed across our business operations and supply chain.

Stay Curious

Modern slavery risks can change over time across industries, geographies, and supply chains. Staying curious supports ongoing awareness of regulatory developments, emerging risks, and evolving expectations. This includes encouraging appropriate due diligence, asking questions, and periodically reassessing assumptions about risk exposure.

Seek Clarity

Modern slavery laws are often principles-based and require interpretation in practice. Circana translates legal obligations into guidance, policies, vendor standards, training, and escalation pathways so risks can be recognized and addressed effectively.



Own the Outcome

Circana recognizes that modern slavery risks may arise at different points in the value chain, including within third-party relationships. Our approach emphasizes accountability, oversight, and appropriate response where risks or concerns are identified, including consideration of remediation and ongoing risk management.

Center on the Client

Our clients expect their business partners to operate ethically and responsibly. Our approach to anti-slavery compliance protects clients from reputational and regulatory risk, builds trust through transparency, and aligns with clients' environmental, social, governance (ESG) and human-rights expectations.

Be a Challenger

An effective approach to modern slavery risk management involves ongoing evaluation and improvement. Circana continuously strengthens processes related to supplier engagement and contractual standards while remaining mindful of potential labor risks in business decisions.

Champion Inclusivity

Modern slavery disproportionately affects vulnerable populations. Circana's approach emphasizes respect, fairness, and the importance of accessible reporting channels. Policies and processes are intended to support employee voice, encourage reporting of concerns, and promote responsible engagement with suppliers and stakeholders.

Commit to Each Other

An effective approach to modern slavery risk management relies on strong culture. Circana's commitment to one another means that we support employees who raise concerns, foster



cross-functional collaboration, and maintain a speak-up environment where concerns can be raised without fear of retaliation.

Our Supply Chain & Modern Slavery Risks

Our supply chain primarily consists of three vendor categories:

1. **Data and market research.** The majority of Circana spend in this category is on data licensing or purchasing and consumer panels.
2. **Professional services and utilities.** This category consists of professional services, utilities, telecommunications, and intercompany agreements.
3. **Technology.** Most of the spend in this category is allocated to IT hardware and data centers supporting our technology infrastructure.

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 Labor), engage with our peers, and consult with external experts. To identify 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, and 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 and skilled and 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 that 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 in this statement.

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 those who speak up.

Policies & Procedures

Through our internal policies and procedures, 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.

We apply consistent standards across our supply chain. Our [Vendor Code of Conduct](#) outlines expectations for vendors to operate lawfully and support fair, respectful and safe working conditions, including:

- Complying with applicable legal requirements;
- Supporting a workforce free of harassment and unlawful discrimination;
- Avoiding the use of forced or involuntary labor of any kind;
- Adhering to all local minimum working age laws and requirements and not utilizing child labor;
- Maintaining respectful treatment of workers, free from abuse or coercion;
- Providing wages and working conditions in accordance with applicable laws;
- Following legal requirements on working hours and overtime; and
- Maintaining employee records in accordance with local and national regulations.

Circana reserves the right to terminate the commercial relationship if a vendor cannot demonstrate sufficient commitment to anti-slavery policies.

Recruitment & 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 that are regularly reviewed in line with employment law and best practices.

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.

Code of Conduct

The [Circana Code of Conduct](#) is separate from our Vendor 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 available in eleven languages. All employees are required to complete training on the Code of Conduct and certify their understanding annually.

Speaking Up

Our Speak Up Policy actively encourages all employees, vendors, and anyone connected to Circana to raise concerns about any activity, breach of law, breach of our Code of Conduct, dangers to the public, or any concealment of information.



Our speak up policies and procedures were updated during the Reporting Period. We continue to maintain a zero-tolerance policy regarding any form of retribution or retaliation against a person who has spoken up in good faith.

All reports are expeditiously reviewed and responded to by the Integrity Program Team. Reports can be made in a number of ways internally, such as speaking to a manager, Human Resources, or the Integrity Program Team. However, we help ensure it is easy for all employees to speak up and report anonymously by providing access to the Integrity Line via web or phone. The Integrity Line is available 24 hours a day, seven days a week, and is 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 by accessing the web portal at <https://circana.integrityline.com>. This web portal also contains local phone numbers.

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

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 Vendor Code of Conduct;
- Monitoring our compliance with UK and Australian anti-slavery requirements;
- Reviewing Integrity Line reports for reports of modern slavery and human trafficking;
- Reviewing local adherence to our recruitment and onboarding policies and procedures; and
- 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 Circana. 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. Applicable members of Circana executive teams considered and provided comments on this statement prior to publication.

Approval

The Integrity Program Team has approved this statement on behalf of Circana. The Board of Directors of Circana, LLC has further approved this statement on behalf of the United Kingdom and Australian Reporting Entities listed on page 3.

/s/ Ronnie Kann

Chief Ethics & Compliance Officer

Circana, LLC

This statement was approved by the Board of Directors of Circana, LLC by way of resolution on May 28, 2026.

/s/ Hannah Kim

Director

Circana, LLC



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 <https://circana.integrityline.com>.

All reports will be treated confidentially to the extent allowed by law and will be 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.

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