



## Modern Slavery and Human Trafficking at CloudCo Solutions

At CloudCo Solutions, we are committed to ensuring that modern slavery and human trafficking have no place in our business or wider supply chains. As a specialist provider of recruitment services within the technology sector, we recognise that we have a responsibility not only to comply with legal and ethical standards, but also to lead by example in promoting dignity, fairness, and respect in all areas of our operations.

This policy sets out our approach to identifying, preventing, and addressing risks of modern slavery within our business and among our partners, candidates, and clients. It reflects our ongoing commitment to ethical integrity, transparency and accountability.

### 1. Definitions

For the purposes of this policy, the term *modern slavery* encompasses:

- **Human trafficking** – the recruitment, transportation, or harbouring of individuals by means of threat, force, coercion, or deception for the purpose of exploitation.
- **Slavery and servitude** – the condition in which individuals are treated as property and deprived of personal freedom.
- **Forced or compulsory labour** – work or services that people are forced to do against their will under the threat of punishment or harm.
- **Child labour** – the exploitation of children through any form of work that deprives them of their childhood, potential, or dignity.

### 2. Organisational Commitment

CloudCo Solutions takes a zero-tolerance approach to modern slavery in all its forms. We are committed to:

- Acting ethically and with integrity in all our business relationships and engagements.
- Implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.
- Promoting awareness of this issue throughout our supply chains and ensuring that our partners, clients, and suppliers share our values.

### 3. Our Business and Supply Chains

CloudCo Solutions provides tailored recruitment services for the technology sector, sourcing talent for permanent, contract and interim roles.

Our supply chain includes:

- Candidates placed in tech-related roles.
- Clients and employers to whom we refer talent.
- Third-party service providers (e.g. payroll, IT support, compliance services).
- External consultants and contractors.

### 4. Risk Assessment and Due Diligence

We undertake ongoing risk assessments of both our internal operations and external engagements. Specific due diligence measures include:



- Verifying the identity, right to work and working conditions of all candidates placed through CloudCo Solutions.
- Assessing client organisations for ethical practices and labour standards, particularly where there may be international or low-visibility operations.
- Reviewing contracts with suppliers to ensure they include modern slavery compliance clauses.
- Conducting reviews and audits of internal processes where appropriate.

Where concerns are identified, we will investigate thoroughly and take necessary steps, including disengagement where a risk cannot be mitigated.

## **5. Policies and Procedures Supporting this Commitment**

This Modern Slavery Policy is supported by the following policies and procedures, which further reinforce our ethical business approach:

- **Anti-Bribery and Corruption Policy**
- **Diversity and Inclusion Policy**

## **6. Training and Awareness**

We provide regular training to all relevant members of staff to ensure they:

- Understand what modern slavery and human trafficking look like in practice.
- Can identify potential warning signs, particularly during the recruitment and onboarding process.
- Know how to raise and escalate concerns appropriately.

We expect our supply chain partners and clients to ensure similar awareness among their own staff and subcontractors.

## **7. Reporting Concerns**

CloudCo Solutions encourages a culture of openness and accountability. Any employee, candidate, contractor, or third party can raise concerns regarding suspected modern slavery without fear of retaliation.

Concerns can be reported directly to the CEO.

All reports will be treated with the utmost confidentiality and urgency. Investigations will be conducted promptly, and appropriate action will be taken against any individual or organisation found to be in breach of this policy.

## **8. Monitoring and Review**

This policy is reviewed on an annual basis or as required in response to legislative changes, operational developments or identified risks. We are committed to continuously improving our policies and procedures to better protect individuals from exploitation.

The responsibility for ensuring the effectiveness of this policy lies with CloudCo Solutions' CEO. We may also publish an annual statement under Section 54 of the Modern Slavery Act 2015, should we meet the reporting threshold.