MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

The Modern Slavery Act of 2015 requires UK companies to take steps to address the risk of modern slavery and human trafficking in their own operations and in the supply chain. Companies must publish a statement each financial year, setting out the measures taken to comply with these responsibilities. At Cloud we are proud of our role as an organisation committed to operating to the highest ethical standards and are happy to share this statement of our position.

Our business structure

Cloud is a UK-based facilities management enterprise, providing a complete FM solution, working in partnership with clients and the supply chain to deliver an unrivalled level of transparency, visibility and control. The great majority of our business constitutes service integration through a carefully chosen population of supply chain partners. We have developed a strong presence in the area of technology-driven asset management.

Our clients are property occupiers and include some of the UK's leading companies and organisations. Our coverage extends beyond the UK and the Republic of Ireland to Continental Europe and beyond.

Cloud and its subsidiary companies operate to a common set of standards and policies.

We employ around 130 employees. We work with over 350 Supply Chain Partner companies, with around 10,000 maintenance operatives between them, covering our national client base's requirement for reactive and planned work.

Our approach to resourcing our business

As a growing business with a continuing appetite for new talent to join us, we have reduced our use of recruitment agencies to a necessary minimum by employing specialist recruiters in-house under the leadership of our Head of Human Resources and to the standards set out in our **Recruitment and Selection Policy**. We ensure that recruitment and selection processes match the highest ethical and legal standards, including the performance of background checks and verification of eligibility for employment. Once colleagues join the Cloud Group, they are provided with access to our Company Intranet which has a suite of good conduct policies together with guidance on the standards we expect and the ongoing training available. These policies include a specific **Anti Modern Slavery Policy**.

Where, exceptionally, we make use of recruitment agencies, or engage temporary employees, we require that the same standards are applied by any third party with whom we deal. Our apprenticeship schemes are operated in conjunction with accredited third parties in the education sector, who we have selected according to a rigorous evaluation process and who themselves in turn demand the highest standards of compliance from us, including explicit endorsement of their Safeguarding Policies and other processes designed to protect young people.

All of our employees are made aware of our zero-tolerance approach to harassment and of our **Whistleblowing Policy**, encouraging them to raise any concerns they may have, including any concerns relating to the risks of modern slavery or human trafficking.

All our Human Resources management policies and procedures are formally reviewed and updated where required, every twelve months.

Our approach to managing our supply chain

As the great majority of our business involves our supply chain partners, we operate on the principle of continuous development of our supply chain management techniques under the umbrella of **Cloud Terms of Business (TOB)** mutually agreed with our partners. Our TOB requires all suppliers to abide by current legislation, including explicit reference to the Modern Slavery Act. In addition, the TOB references operating requirements set out in the Service Level Document (SLD). The SLD includes ESG criteria specifically stating that forced labour and modern slavery are disallowed. Both the TOB and the SLD have been extensively updated and reissued to all supply chain partners for signature during the past twelve months.

Selection and procurement of supply chain partners takes place according to set criteria and a regular re-evaluation process. Supply chain partner selection includes tests of a company's suitability for engagement as a partner, covering that company's own policies and processes for the ethical and lawful management of their employees. These criteria are fully transparent to the supply chain partners themselves, so they are aware of the standards we expect.

We make explicit reference to compliance with the requirements of the **Modern Slavery Act** in our supply chain engagement process. We will not work with a supply chain partner or other third party found to be in breach of the Act.

We consider the most immediate potential for risk of non-compliance with the Act in our supply chain as being associated with the use of temporary or lower-skilled labour. Our system requires individual operatives to be registered with us, so we have opportunities to detect possible indicators of non-compliance. All concerns raised with us relating to possible non-compliance with the Act, with other legislation, or relating to the principles of good practice are logged, investigated, and appropriate action taken. This may be up to and including full disengagement from the third party concerned. Concerns are investigated to the same degree of detail irrespective of how they have come to light and from whom.

Our ongoing commitment

This statement constitutes a statement as required by Section 54 of the Modern Slavery Act 2015 and has been endorsed by the Board of Directors of Cloudfm Group Ltd. This issue number relates to the business financial year ending 31st July 2024 and to the period up to the date of issue.

The contents of this statement and of the policies and procedures referred to are reviewed annually in any event and enhancements are incorporated whenever the opportunity arises. We regard the incidence of reported concerns as one measure of our policy's effectiveness. There were none in the period up to the date of issue.

Our policy applies to Cloudfm Group Ltd and to all its subsidiaries..



Jeff Dewing Chief Executive, Cloudfm Group
Colchester
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