

Annual anti-modern slavery statement 2025

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Introduction

Cloud21 understands the serious issues represented by modern slavery and human trafficking. These crimes are a gross violation of fundamental human rights. Slavery and trafficking can take various forms, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain.

Cloud21 is committed to acting ethically and with integrity in our dealings and relationships with others and to the fair and humane treatment of people associated with our business. We have a zero-tolerance approach to slavery and trafficking, and we expect the same standard from our people, contractors and suppliers.

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the steps that we have taken to prevent modern slavery and human trafficking within our business and supply chains for the year ending 31st December 2024.

Our business and organisation structure

Cloud21 is a digital healthcare and consulting services company supporting the delivery of integrated solutions to healthcare.

Our employees provide services, expertise, and advice to our clients, whilst we engage external contractors to provide specialist services to clients where we are unable to do so in house. Our suppliers include but are not limited to:

- Recruitment agencies
- Training providers
- I.T software providers
- Catering, hospitality and event companies
- Legal services
- Occupational health providers

Our policies

We uphold the highest standard of professional conduct in our business dealings, acting with integrity and demonstrating fair, equal and humane treatment of all people.

Our values are the intrinsic drivers for every decision we make as a company. They inspire our interactions with each other, with our customers and with our wider community.

Respect every person: We build trust by respecting the dignity, worth, and wellbeing of everyone without exception. We seek to understand and always assume positive intent. We are open, empathetic and acknowledge everyone for their unique contributions to our team.

Act with Integrity: We are open, honest, and kind to one other. We provide clear feedback with compassion and intention, and we receive feedback with curiosity. We hold ourselves accountable to do what we say we'll do.

Strive for Better: We devote time and energy to understanding our clients, their needs, and how we can serve them. Curiosity and courage help us to solve problems and strive for better. We listen, learn and work hard to always improve ourselves and our results.

Embrace Change: We tackle challenges head on, with courage and an open mind. We push ourselves to try new things, learn from failure, and forge ahead. We know change is a key enabler to growth and innovation and is seek as essential to our success and the success of our clients.

Deliver as a Team: We work together to deliver exceptional results. We gain strength from being part of one team and win by delivering solutions that benefit our clients, our business, and our colleagues.

Our partners and our people are required to comply with these values and to avoid any direct or indirect harassment, victimisation or discrimination of colleagues, suppliers or other third parties. Such behaviour may be deemed as gross misconduct which could result in serious disciplinary action and or dismissal. Discriminatory behaviour, victimisation and harassment is also governed by the Equality Act 2010, which makes such practices unlawful.

Employees and contractors are encouraged to raise any concerns that they may have about Cloud21's business practices or the conduct of others and have access to a whistleblowing policy to support them to do so.

Risk assessment and due diligence processes

Cloud21 provides consultancy services, primarily in the UK, which is considered a low-risk activity in regard to slavery and human trafficking, but we continue to assess the threats of slavery and human trafficking occurring within our operations.

Our recruitment policies ensure that all candidates produce documentation confirming that they have the right to work in the UK, prior to commencing employment. All employees and contractors are engaged on written contracts which guarantee their pay and conditions.

Our onboarding and due diligence process requires all new suppliers to outline their approach to eradicating modern slavery before they are able to commence a relationship with Cloud21. We expect our suppliers to share our values and zero-tolerance approach to forced labour. We therefore ask suppliers to confirm what steps they take to ensure these risks are not present within their own supply chains. All approved suppliers are issued with a code of conduct to this effect and are expected to reconfirm their compliance every 2 years.

Referring to the [International Labour Organisation's Indicators of Forced Labour](#), Cloud21 has not found, or been made aware of, any instances of modern slavery or human trafficking within our business or supply chain to date.

Training and raising awareness

This statement is easily accessible to our employees and contractors via our SharePoint document library and is signposted along with our whistleblowing policy as part of the Cloud21 induction process. Cloud21 includes modern slavery awareness training as part of the employee mandatory training matrix via our online training platform.

A handwritten signature in black ink, reading 'Kath Dean'. The signature is fluid and cursive, with the first name 'Kath' and the last name 'Dean' clearly distinguishable.

Kath Dean (President)

30.04.2025