CloudClevr

Modern Slavery Statement
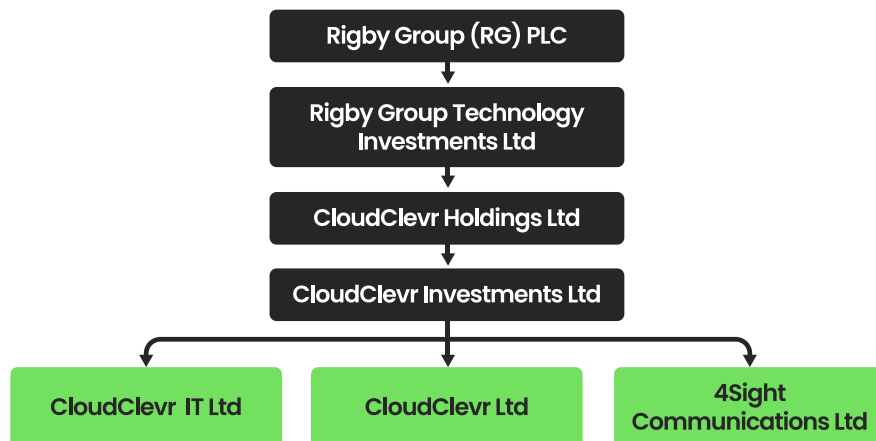
1   Introduction

This statement has been published in accordance with the requirement of section 54(1) Modern Slavery Act 2015 "the Act". It sets out the steps taken by CloudClevr during the financial year ended 31st March 2025 to ensure modern slavery and human trafficking, collectively referred to as "modern slavery" in the statement, is not taking place in our business or our supply chains. We adopt a zero-tolerance approach to modern slavery.

2   Organisation structure and supply-chains

2.1   Business structure

CloudClevr Group is made of several operating companies with our ultimate parent company being that of Rigby Group (RG) Plc.

The group structure is as follows:

We are a transformative technology business, combining our core strengths as seasoned technology operators to empower businesses to grow and demonstrate return on investment.

This statement is published separately from Rigby Group's to demonstrate that our zero-tolerance approach to modern slavery remains meaningful by reflecting how we operate.

2.2 Governance

The Executive Board has ultimate responsibility over financial reporting, risk management and governance, and internal and external audit.

The Executive Board aim to meet monthly and more frequently if required.

CloudClevr has a Risk Management Team that maintains an Enterprise Risk Register which identifies and documents key enterprise risks across the Group, which are then reported to the Executive Board for discussion. To the extent any concerns or risks regarding modern slavery were to be identified, these would be dealt with the utmost priority, and measures would be implemented to eradicate any such risks to the extent possible. No concerns have been raised in this year's reporting.

Going forward, we are looking to complete a review of the Enterprise Risk Inventory during which it will be flagged where risks relating to modern slavery should be included, if deemed relevant.

The Executive Board review and approve key corporate policies, including some of those listed in section 3.0, which they expect to be in place. They set the tone from the top, demonstrating a strong commitment to integrity and ethical values. Following approval, they are shared with all employees, contractors, third parties and temporary staff via email. These policies are published on the CloudClevr Intranet. It is the responsibility of management to ensure that appropriate training is provided to all staff. When policies are next issued, we will request senior and departmental management to provide attestation against these policies, or action plans if they believe they have material gaps.

2.3 Supply chains

Our supply chains cover the procurement of goods and services to support the provision of managed services. The key areas being:

- IT – Support, Maintenance and Software Licences
- Telecommunications and Connectivity
- Supply of IT and Telecommunications Hardware

Most of our supply chain is based in the UK, Europe and / or the USA. We do not consider that the countries or sectors from which our suppliers are sourced are high-risk from the perspective of modern slavery.

3   Related policies

Our relevant internal policies continue to consist of:

- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Supplier Code of Conduct
- Equality, Diversity and Inclusion Policy
- Grievance Policy

Our policies are periodically reviewed to ensure they are maintained to the highest standards and are reflective of current legislation and market practices. All policies are available to employees on the Intranet and our Supplier Code of Conduct is published on our website.

The policies are recognised as being an important tool for documenting how to conduct ourselves as a business and individually in such a way which is appropriate, transparent and respectful of others. We plan to further strengthen our suite of policies by publishing an Ethics and Business Conduct Policy and a Modern Slavery Policy (which is currently communicated via our published statement).

4   Due diligence

4.1   Supplier onboarding

Our Supplier Code of Conduct is published on our website and supplier on-boarding process includes the following checks:

- Carry out financial due diligence
- Confirm company details with applicable registers
- Carry our IR35 and labour provider assessments
- Ensuring the company or ultimate parent company is not based in a high-risk county for money laundering
- The company has published a modern slavery statement (if it meets criteria)

All suppliers are reviewed prior to onboarding and all key suppliers annually or if there is fundamental change such as mergers or acquisitions.

None of the suppliers reviewed had ties to high-risk countries.

4.2 Recruitment

Recruitment requisition and job offer forms are subject to an approval process and identity and right to work checks are completed as part of our recruitment process. The majority of staff are employed directly and we make use of contractors. Our supplier onboarding form includes due diligence specific to risks associated with contractors, as included in section 4.1.

4.3 Reporting and remediation

CloudClevr has a Whistleblowing Policy and will onboard an external service provider via which reports can be made anonymously by the end of the financial year. This helps ensure any reported issues are highlighted to the executive team as appropriate and properly remedied. We have not received any report of nor discovered any instances of modern slavery in our business or supply chains. However, were any to arise, we would take the matter very seriously and act swiftly to take appropriate action up to and including termination of operations with the supplier.

5 Risk assessment

We assess the potential modern slavery risks of our supply chains by considering the origin of our suppliers and nature of supply. We do not consider that the countries or sector from which our supplies are sourced are high-risk from the perspective of modern slavery and will continue to monitor this.

6 Training

Training is provided to employees on policies and procedures related to their roles as part of onboarding and subsequently as required. Based on our risk assessment, a formal training program regarding modern slavery is not considered necessary and this approach will continue to be re-assessed.

7 Measuring effectiveness

7.1 Objectives

During the course of the next financial year, we have the following objectives related to modern slavery, underlining our commitment to continual improvement:

- Complete review of the Enterprise Risk Registry and flag where risks relating to modern slavery should be included
- We will request senior and department management provide attestation against the key policies, or action plans, if they believe they have material gaps.
- We plan to further strengthen our suite of policies by publishing an Ethics & Business Conduct Policy and a Modern Slavery Policy (which is currently communicated via our statement).

We reiterate that issues of such severity as slavery and human trafficking are of great importance to the shareholders, which continues to encourage and promote a safe, fair and honest workplace for its staff and those of its suppliers.

This statement was approved by the CloudClevr Executive Board.

Signed by

Steve Harris - CEO