

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

DATE: **1st April 2022**

www.brightcloudgroup.global

Registered Address:

Bright Cloud Ltd, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

Company Registration No:

07569936

STATEMENT

This is the Anti-Modern-slavery and anti-trafficking statement for financial year ending 31st March 2023.

This statement is made on behalf of Bright Cloud Limited pursuant to Section 54 (1) of the Modern Slavery Act 2015.

This is Bright Cloud's first annual statement relation to the Modern Slavery Act 2015.

We are committed to combatting Modern Slavery and Human Trafficking, ensuring organisations we engage with, be it customers, or within our supply chain are aware of and compliant with the Modern Slavery Act 2015.

Responsibility for the preparation and publication of the statement resides with the Chief Executive Officer. BrightCloud have implemented a 'top down' approach.

The policy against modern slavery and human trafficking has been introduced and added to the Corporate Handbook and requires all employees to understand and agree to the policy.

We have ensured contractual obligations are in place in our Standard Terms and Conditions for all organisations we engage and with whom we conduct business, as well as all Bright Cloud Ltd Employees.

STRUCTURE

Bright Cloud Ltd is a privately owned business, providing leading telecommunications, contact centre, and customer experience services and software to organisations predominantly located in the United Kingdom, with some EU clients. Our employees are all eligible to work in the UK and operate from premises based in the UK.

Bright Cloud Ltd is the trading subsidiary of Bright Cloud Group Limited, all statements and policies made by Bright Cloud Ltd apply to its parent company and visa versa.

POLICY REVIEW AND STATEMENT APPROACH

In steps to enforce our commitment, Bright Cloud will review the policy at least annually, and will in turn maintain the following policies, which will adhere to the obligations set out under the Modern Slavery Act 2015.

- Modern Slavery and Human Trafficking policy
- Supplier Code of Conduct
- Equal Opportunities Policy
- Recruitment Policy

RISK ASSESSMENT and AUDITING

A Risk Assessment review has been conducted and identified that our primary risk is through our supply chain and suppliers to Bright Cloud Ltd and its customers. Our controls to mitigate this risk, should be agile as the company grows, and grows its list of suppliers.

We endeavour to carry out a review of all Suppliers, Third parties, delivery partners, or customers to ensure they have sufficient policies, procedures and are contractually obliged to tackle modern slavery and human trafficking.

We will maintain a complete set of records to trace supply chain and Services provided. To provide complete transparency, these records can be audited by our customers as is reasonably required. In addition, we will mitigate risk via our supply chain in the following ways:

- Ensuring appropriate termination clauses are in place when compliance with the Modern Slavery Act 2015 are not met
- Carry our due diligence research to identify organisations and individuals with criminal convictions or a high risk of non-compliance
- Request a Modern Slavery and Trafficking Statement from all Suppliers regarding the suitability of its workforce and its supply chains in turn
- Include contractual arrangements to include a mandatory undertaking from our Suppliers that they comply with the Modern Slavery Act 2015.

TRAINING

Bright Cloud Ltd are committed to educating our employees to fully understand the implications of modern slavery and human trafficking abuses, whether in our business or supply chain, how to identify risk, and perform a risk assessment on suppliers, customers and third parties. Escalation steps are made clear if any employee identifies risks or has concerns.

The Modern Slavery Statement and policy is documented in the Company Handbook, which will be reviewed at least annually.

We will maintain awareness through employee induction, employee training, and updated policies and documentation as needed.

EXECUTIVE and SENIOR RESPONSIBILITIES

The Company understands our corporate responsibility is of the upmost importance and aim to operate the business responsibly, building a safe, inclusive, environment for others. We aim to establish a corporate responsibility board, focused on corporate policy, and procedures to support our efforts in relation to the Modern Slavery Act 2015 amongst other policies we are focused on rolling out.

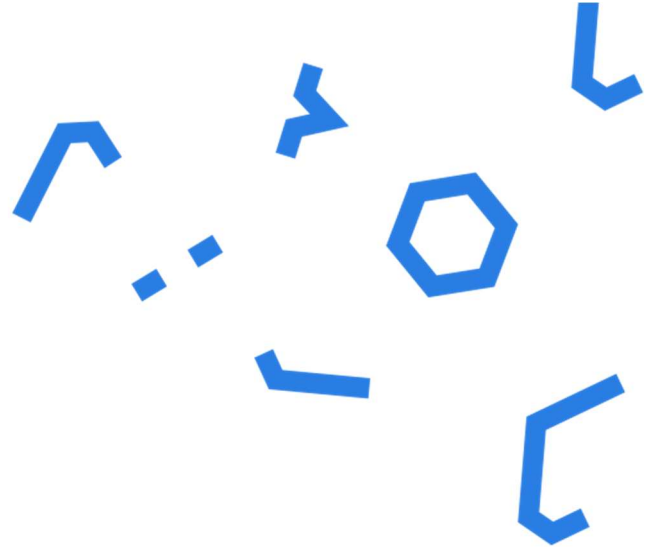
This board contains key personnel from a number of areas of our business:

- Senior Stake Holders,
- Human Resources,
- and Procurement.

SIGNED

This Statement is signed by Alex Morrison, CEO





MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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MODERN SLAVERY POLICY

This Modern Slavery Policy should be read in conjunction with Bright Cloud's Modern Slavery Statement.

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas.

We expect high standards from all of our subcontractors, suppliers and other business partners and have made this a contractual term in our agreements with significant suppliers wherever possible.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

RESPONSIBILITIES

The Senior Leadership Team of the organisation has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

The Human Resources department along with the Procurement team have primary and day-to-day responsibility for implementing this policy, but those in other roles involved in our supply chain, should assist with reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.

COMPLIANCE

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or Human Resources as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our organisation or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or Human Resources, or report it in accordance with our Whistleblowing Policy as soon as possible.

BrightCloud encourages openness and will support anyone who raises genuine concerns in good faith in accordance with the organisation's whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our organisation or in any of our supply chains.

COMMUNICATION AND AWARENESS

BrightCloud's zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We have an Ethical Sourcing Policy (ESP) which all our suppliers must agree to adhere to before we will work with them. The ESP covers topics such as Bribery & Corruption, Labour Rights, Freedom of Association, Working Conditions, Child Labour, Living Wage, Working Hours, Regular Employment, Inhuman Treatment, Entitlement to Work, Sub-contracting, Environmental Compliance, Conflicts/Sanctions, Personal Data and Product Safety.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we provide training to all staff at point of induction and then annually thereafter.

TRAINING

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MEASURING AND REPORTING

BrightCloud measure the following Key Performance Indicators to ensure effectiveness of the steps taken to combat Modern Slavery:

BREACHES

Any employee who breaches this policy could be subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.