



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



