

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 Cloudfm Group 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

The Cloudfm Group 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. Whilst the great majority of our business constitutes service integration through a carefully chosen population of supply chain partners, we also have our own team of multi-skilled engineers who focus on proactive maintenance, supporting compliance, estate uptime, asset and cost management. In addition, we serve clients through technical consultancy, designing and implementing specialist projects.

Our clients include some of the leading UK brands in retail and restaurants as well as representing the commercial property, media and charity sectors amongst others. Our coverage extends beyond the UK and the Republic of Ireland to Continental Europe.

The Cloudfm Group and its subsidiary companies operate to a common set of standards and policies

Between the two main operating subsidiaries of the Cloudfm Group, we employ around 300 staff in four principal locations and in the field. 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 work.

Our approach to staffing 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 an in-house team of specialist recruiters under the leadership of our Director 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 Cloudfm Group, they are provided with an **Employee Handbook** and access to our 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 staff, 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 staff 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 of our Human Resources management policies and procedures have been formally reviewed and updated where required, within the past twelve months.

Our approach to managing our supply chain

As the majority of our business by volume involves our supply chain partners, we operate on the principle of continuous development of our supply chain management techniques and under the umbrella of a mutual **Supply Chain Charter** as well as agreed **Cloudfm Terms and Conditions** with our partners.

Our Supply Chain and Procurement Director has overall responsibility for selection and procurement of supply chain partners 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 staff. These criteria are fully transparent to the supply chain partners themselves so they are aware of the standards we expect.

We have introduced explicit reference to compliance with the requirements of the **Modern Slavery Act** into 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 2018 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, in particular the two main UK operating subsidiaries, Cloudfm Integrated Services Ltd and Cloudfm Shared Services Ltd.

Jeff Dewing
Chief Executive, Cloudfm Group

Colchester
May 2019