

Modern Slavery Act 2015 Policy & Statement

We recognise that Modern slavery is a crime and a violation of fundamental human rights. We are aware that Modern slavery takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, 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.

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015.

The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

We continue to adopt a zero tolerance to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour.

We fully support the government's objectives to eradicate all forms of modern slavery and human trafficking.

We continue to set high standards of impartiality, integrity, transparency, and objectivity. We will ensure that our activities and those of our contractors operate to the highest level of ethical standards operating under sound governance arrangements.

Our annual statement attached to this Policy provides details of our activities, our supply chains, and actions we are continuing to take to support the government.

We require all organisations we engage with to ensure their goods, materials and labour-related supply chains are unambiguous:

- Fully comply with the Modern Slavery Act 2015; and are
- Clear, transparent, accountable, and auditable; and are
- Free from ethical ambiguities.

We call upon all organisations we engage with to influence their global supply chains by improving transparency, accountability, and training so that together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 06 April 2023.

METCLOUD ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

METCLOUD has business operations in the United Kingdom.

We operate in the Cyber Security sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT software and marketing services.

For more information about the Company, please visit our website: www.metcloud.com.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy - 'We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check where employees may be working with vulnerable people.'

- Supplier code of conduct - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules, and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.'
- Whistleblowing policy - 'We operate this policy so that employees are able to raise concerns about how staff are being treated or practices within our business or our supply chains without fear of reprisal.'
- Staff code of conduct - 'We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.'

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits.

Our due diligence procedures aim to:

- Identify and act on any potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Creating an annual risk profile for key suppliers.
Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because the business operates with the majority of our supply chain based in the UK and in low-risk industries, such as internet software and services.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 12 months.
- We will carry out a regular audit of suppliers - 100% of suppliers - each year.

The statement was approved by the board of directors.



Ian Vickers
Director



Sonia Vickers
Director

Date: 01/06/2023