Annual Modern Slavery and Human Trafficking Statement 2026

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Introduction

Cloud21 recognises that modern slavery and human trafficking are serious criminal offences and grave abuses of fundamental human rights. These practices can take a number of forms, including slavery, servitude, forced or compulsory labour and human trafficking, all of which involve the exploitation of another person for personal or commercial gain.

Cloud21 is committed to conducting its business ethically, with integrity and with respect for the dignity and welfare of all individuals connected with our operations. We maintain a zero-tolerance approach to modern slavery and human trafficking and expect the same standard from our employees, workers, contractors, suppliers and other business partners.

This statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Cloud21 during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking in our business and supply chains. In preparing this statement, we have had regard to current Home Office guidance on transparency in supply chains and, where relevant to our role in supporting health sector clients, to NHS expectations concerning modern slavery risk management in procurement and contract delivery.

Our Business and Organisation Structure

Cloud21 is a digital healthcare and consultancy business supporting the design, procurement and delivery of integrated solutions to the health sector and other public service environments. Our organisational structure comprises an executive leadership team, supported by corporate services, delivery teams and subject matter specialists operating primarily in the United Kingdom and, where relevant, with limited support activity across Europe.

Our people provide advisory, programme, procurement and delivery support services to clients. Where specialist capability is required, we engage contractors and third-party suppliers in accordance with our onboarding and assurance processes. Our supply chain is predominantly UK-based and principally comprises professional services, recruitment, training, technology, legal and occupational health providers. We maintain oversight of supplier categories at onboarding and

through periodic review, recognising that supply chain visibility beyond tier one may be limited in some areas and requiring proportionate further enquiry where risk indicators arise. Where we support NHS or other public sector clients, we seek to ensure that our own arrangements support the reasonable and proportionate management of modern slavery risk expected in public procurement and contract delivery.

Our suppliers include but are not limited to:

- Recruitment agencies
- Training providers
- I.T software providers
- I.T hardware providers
- Catering, hospitality and event companies
- Legal services
- Occupational health providers.

Our Policies

Our approach to preventing modern slavery is underpinned by our values, this statement, our whistleblowing arrangements, our recruitment and onboarding controls and our supplier due diligence and code of conduct requirements. Together, these measures promote lawful and ethical business conduct, support the identification of risk and provide routes for concerns to be raised and addressed.

Our values inform the standards of behaviour expected across the organisation and reinforce our commitment to dignity, fairness, accountability, continuous improvement and collaborative delivery.

Respect every person: We build trust by respecting the dignity, worth, and wellbeing of everyone without exception. We seek to understand and always assume positive intent. We are open, empathetic and acknowledge everyone for their unique contributions to our team.

Act with Integrity: We are open, honest, and kind to one other. We provide clear feedback with compassion and intention, and we receive feedback with curiosity. We hold ourselves accountable to do what we say we'll do.

Strive for Better: We devote time and energy to understanding our clients, their needs, and how we can serve them. Curiosity and courage help us to solve problems and strive for better. We listen, learn and work hard to always improve ourselves and our results.

Embrace Change: We tackle challenges head on, with courage and an open mind. We push ourselves to try new things, learn from failure, and forge ahead. We know change is a key enabler to growth and innovation and is seek as essential to our success and the success of our clients.

Deliver as a Team: We work together to deliver exceptional results. We gain strength from being part of one team and win by delivering solutions that benefit our clients, our business, and our colleagues.

Our employees, workers, contractors and partners are expected to comply with these standards and to avoid any conduct that could undermine the fair, lawful and respectful treatment of others. Breaches may result in disciplinary action, termination of engagement or other appropriate contractual remedies. We also recognise our wider legal obligations, including those arising under the Equality Act 2010 and other applicable employment and safeguarding requirements.

Employees, workers and contractors are encouraged to raise concerns regarding Cloud21's business practices, the conduct of others, or any actual or suspected instance of modern slavery or human

trafficking. Concerns may be raised through management channels or under our whistleblowing arrangements, ensuring that concerns can be escalated safely without fear of retaliation. Concerns will be reviewed promptly and, where appropriate, escalated for investigation, protective action and remedial action. We also expect suppliers to notify us without delay of any actual or suspected breach of applicable anti-slavery requirements within their own organisation or supply chains.

Risk Assessment and Due Diligence Processes

Cloud21's operating model is service-led and is generally lower risk than labour-intensive or manufacturing sectors. However, we recognise that modern slavery risk can arise in any organisation and at multiple points within the supply chain. We therefore take a risk-based approach, considering factors such as the nature of the goods or services supplied, the use of temporary, agency or migrant labour, geographic footprint, subcontracting arrangements, workforce vulnerability and the degree of supply chain visibility available to us.

Our recruitment controls require appropriate right to work verification before employment commences, and our employees, workers and contractors are engaged under written terms setting out the applicable pay and conditions. Where concerns are identified during recruitment, onboarding, supplier due diligence or contract management, Cloud21 may undertake further enquiry, require corrective action, impose additional monitoring, suspend onboarding or decline to proceed with or continue the engagement, depending on the nature and severity of the risk.

Our supplier onboarding and due diligence processes require relevant suppliers to explain the steps they take to prevent modern slavery and human trafficking within their own operations and supply chains. Depending on the nature of the goods or services, and where elevated risk is identified, suppliers may be asked to provide further assurance regarding workforce practices, subcontracting, corrective action processes and the controls applied within their own supply chains. Approved suppliers are issued with or contractually bound to comply with our expected standards of business conduct, and we may seek periodic reconfirmation of compliance or further information where a material risk indicator is identified. In NHS-facing or other regulated procurements, we seek to provide clients with reasonable assurance that our own controls, and those we require from our suppliers where relevant, support applicable procurement and contract management expectations.

We monitor the effectiveness of our approach through the operation of recruitment controls, supplier onboarding checks, periodic supplier assurance activity, training completion records and the reporting of concerns through management and whistleblowing channels, these controls align with public sector procurement expectations and NHS ethical supply chain requirements by providing clear accountability, proportionate risk management, enforceable supplier standards, transparent reporting and robust escalation arrangements.

During the reporting period, Cloud21 did not identify, and was not made aware of, any substantiated instance of modern slavery or human trafficking within our own business. We recognise, however, that an absence of reported cases does not in itself demonstrate an absence of risk, and we will continue to review and strengthen our controls, supply chain visibility and assurance activity as part of our continuous improvement approach.

Training and Raising Awareness

This statement is accessible to employees, workers and contractors through Cloud21's document library and is signposted as part of induction alongside our whistleblowing arrangements. Modern slavery awareness is included within our mandatory training programme, with refresher training delivered periodically as part of our compliance framework. We also communicate our expectations

to relevant suppliers through onboarding, contractual documentation and our code of conduct requirements so that they understand the standards expected of them and the importance of identifying, escalating and addressing modern slavery risks.

Approved on behalf of Cloud21

Date of approval: 30.04.2026