



## Modern Slavery Statement

This statement covers the financial year ending 30 June 2025.

### 1. Introduction

Cloud Direct is committed to upholding the highest standards of ethical conduct and human rights. Modern slavery and human trafficking are abhorrent abuses of fundamental rights and freedoms. This statement outlines the steps we have taken and continue to take to prevent modern slavery within our organisation and throughout our supply chains. This statement is published in accordance with section 54 of the Modern Slavery Act 2015.

### 2. Organisation Structure and overview

Cloud Direct is the trading name of On Direct Business Services Ltd. We operate as a technology services provider specialising in cloud transformation, cybersecurity, and managed services for customers across the UK.

Our business activities include:

- Professional and managed services focused on Microsoft technologies
- Cloud consultancy, migration, and optimisation
- Cybersecurity and compliance services
- 24/7 customer support

Our supply chains include:

- Enterprise cloud technology partners and software providers
- Hardware and equipment manufacturers
- Professional services contractors and consultants
- Business operations support providers

We recognise that modern slavery risks can occur at various levels of a supply chain, including deeper-tier suppliers, and we remain committed to ensuring transparency and ethical conduct throughout all relationships.



### 3. Policies in Relation to Modern Slavery and Human Trafficking

Cloud Direct maintains a zero-tolerance policy toward modern slavery. Our policies include:

- Anti-Slavery and Human Trafficking Policy
- Supplier Code of Conduct
- Ethical Procurement Policy
- Whistleblowing Policy
- Safeguarding Policy

These policies collectively ensure that employees, contractors, and suppliers understand our expectations and legal obligations regarding human rights and ethical conduct.

### 4. Due Diligence Processes

To identify and mitigate the risks of modern slavery, Cloud Direct has implemented the following due diligence measures:

- Conducting supplier risk assessments during onboarding
- Requiring suppliers to confirm compliance with the Modern Slavery Act
- Incorporating anti-slavery clauses into all new and renewed contracts
- Reviewing suppliers with higher-risk profiles more frequently
- Maintaining a formal process for reporting concerns

### 5. Risk Assessment and Management

Cloud Direct has assessed the areas of our business and supply chain where there is an elevated risk of modern slavery. These include:

- International supply chains with variable regulatory frameworks
- Subcontracted labour

To manage these risks, we have:

- Strengthened supplier eligibility criteria
- Introduced enhanced checks for suppliers labelled as higher risk
- Required suppliers to provide evidence of policy compliance
- Increased engagement with governance teams to spot red flags early

Where non-compliance is identified, Cloud Direct works with suppliers to implement corrective action plans and reserves the right to suspend or terminate relationships where serious or unresolved breaches occur.



## 6. Measuring Effectiveness

Cloud Direct evaluates its effectiveness in preventing modern slavery through:

- Percentage of new suppliers completing modern slavery due diligence
- Number of staff completing mandatory training
- Supplier audits conducted and corrective actions required
- Reports or concerns raised under the Whistleblowing Policy
- Contract compliance rates across high-risk suppliers

## 7. Training and Capacity Building

We deliver safeguarding and modern slavery training to our staff, tailored to role and responsibility. Training covers:

- Recognising signs of modern slavery
- Understanding legal obligations under the Modern Slavery Act
- How to escalate concerns
- Responsibilities of procurement, HR, and leadership teams

## 8. Reporting and Responsibility

Everyone working for or with Cloud Direct shares responsibility for identifying and reporting concerns related to modern slavery. Any suspicion of non-compliance must be reported immediately to our Governance team.

## 9. Continuous Improvement

Cloud Direct is committed to increasing transparency and strengthening processes to prevent modern slavery. We publish our modern slavery statement annually and continue to review supplier practices, internal procedures, and policy effectiveness.

Cloud Direct recognises its responsibilities as a supplier to UK public sector bodies, including those purchasing services through Crown Commercial Service frameworks such as G-Cloud, and aligns its approach with government procurement policy on tackling modern slavery.



## 10. Contact Information

Cloud Direct

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## 11. Approval

This statement has been approved by the Board of Directors of Cloud Direct and is signed on their behalf by:

Signed by:  
*Leighton Searle*  
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Leighton Searle:

Chief Executive Officer

Cloud Direct

Date: 5/7/2026

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