
modern slavery and human trafficking.

1. Policy Statement

Circle Cloud Communications Ltd is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We operate a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings.

2. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, agents, contractors, external consultants, and third-party representatives.

3. Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations. Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy.

4. Due Diligence Processes

As part of our initiative to identify and mitigate risk, we will:

- Identify and assess potential risk areas in our supply chains (e.g., sectors like cleaning, catering, or IT hardware).
- Incorporate anti-slavery clauses into our contracts with new suppliers.

5. Supplier Adherence to Our Values

We have zero tolerance for slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. We will not support or deal with any business knowingly involved in slavery or human trafficking.

6. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide relevant training to our staff, particularly those involved in procurement and HR.

7. Reporting Concerns

If you suspect or become aware of any instance of modern slavery within our business or supply chain, you must report it to Russ Barrett or via rbarrett@ctg.co.uk immediately.

Last Updated: Monday, 5th of January 2026