MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to Cielo Costa Limited (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2022-23.

We are committed to working towards the eradication of modern slavery and human trafficking from our supply chain, and in any other part of our businesses. Our code of conduct reflects our commitment to acting ethically and with integrity, whether dealing with individuals, companies or other organisations.

B) ORGANISATIONAL STRUCTURE

Cielo Costa Limited is a limited company, which is registered in both England and Wales. It has its head office in Oakham, England.

Cielo Costa employs over 40 people worldwide. It has a business presence in over 12 countries and delivers high quality Microsoft and bespoke software development solutions.

C) DEFINITIONS

Cielo Costa Limited considers that modern slavery encompasses:

* Human trafficking;
* Forced work, through mental or physical threat;
* Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
* Being dehumanised, treated as a commodity or being bought or sold as property;
* Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

We acknowledges our responsibilities in relation to tackling modern slavery and commit to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

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No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in each employing Country and in many cases exceeds those minimums in relation to its employees.

E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation’s main supply chains include those related to cloud services and purchase of IT equipment and services and these are purchased from organisations which state a commitment to compliance with the Modern Slavery Act 2015.

F) POTENTIAL EXPOSURE

In general, we consider our exposure to slavery/human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to us.

G) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the policies of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place by implementing systems to:

* identify and assess potential risk areas in our supply chain via our supplier management processes;
* mitigate the risk of slavery and human trafficking occurring in our supply chain;
* protect whistle blowers and those who speak up.

We have a zero-tolerance attitude to slavery and human trafficking and encourage colleagues to speak up or call the Modern Slavery Helpline on 08000 121 700 if they have concerns or suspicions.

H) POLICIES

Our Organisation has the following policies which further define its stance on modern slavery:

* a corporate social responsibility policy;
* recruitment policy.

I) TRAINING

We conduct training sessions for our teams to help them identify signs of modern slavery and highlight the correct reporting procedures, should such be identified. We deliver other awareness training to all staff during their induction.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

**Date of next review: 21st November 2023**

**Dated: 22nd November 2022**

**Version: 2.0**