



Modern Slavery and Human Trafficking Statement

NUSO CLOUD UK LIMITED

Financial Year Ending: 2025

NUSO CLOUD UK LIMITED is committed to acting ethically and responsibly and to ensuring that modern slavery and human trafficking have no place in our business operations or supply chains.

This statement sets out the steps taken by NUSO CLOUD UK LIMITED during the relevant financial year to prevent modern slavery, including forced labour, servitude, child labour, and human trafficking. This statement relates to the operations and supply chains of NUSO CLOUD UK LIMITED and to individuals working directly for, or on behalf of, the company.

Our business and how we operate

NUSO CLOUD UK LIMITED is a UK-based cloud communications provider operating within the telecommunications and technology sector. Our services include VoIP, SIP trunking, Microsoft Teams integration, and unified communications solutions delivered to public and private sector customers.

Our business model is service-led and technology-focused. We do not manufacture goods, operate factories, or engage in labour-intensive production activities. Our workforce consists primarily of directly employed staff and contractors performing professional, technical, and operational roles, predominantly within the United Kingdom.

To deliver our services, we rely on a network of third-party suppliers and partners, including:

- telecommunications carriers and network providers
- data centre and cloud hosting providers
- hardware and infrastructure vendors
- software development, integration, and support partners

The majority of our suppliers are based in the United Kingdom or the European Economic Area and operate in sectors generally considered lower risk for modern slavery.

Our approach to human rights and ethical conduct

Respect for human rights and ethical conduct underpins how NUSO CLOUD UK LIMITED operates. We recognise that modern slavery is a serious violation of human rights and that businesses have a responsibility to identify and address risks, including risks that may arise indirectly through supply chains.

Our expectations are embedded within our internal governance framework and supported by documented policies and procedures, including:

- an Anti-Slavery and Human Trafficking Policy
- a Whistleblowing Policy that enables concerns to be raised confidentially and without fear of retaliation
- a Supplier Code of Conduct setting minimum standards for labour practices, ethical behaviour, and legal compliance
- employment policies promoting fair treatment, equality, and inclusion

These policies apply across our operations and inform how we engage with suppliers, contractors, and other business partners.

Managing risk in our supply chain

We take a proportionate, risk-based approach to managing modern slavery risks. While the overall risk profile of our business is considered low, we recognise that risks may arise through third-party relationships, particularly in areas such as:

- telecommunications infrastructure provision
- outsourced or offshore technical services, where used
- logistics and freight services associated with equipment supply

To manage these risks, we:

- prioritise suppliers with established compliance frameworks and transparent labour practices
- require suppliers to confirm compliance with applicable labour and modern slavery legislation
- incorporate modern slavery and ethical conduct expectations into contractual arrangements where appropriate
- reserve the right to investigate concerns, require corrective action, or terminate supplier relationships in the event of serious non-compliance

Due diligence processes

As part of our supplier management framework, we undertake proportionate due diligence to identify and assess modern slavery risks prior to onboarding new suppliers and on an ongoing basis where appropriate. This includes supplier self-certification, review of relevant policies and controls, and enhanced assessment for suppliers identified as higher risk based on sector, geography, or service type.

Our due diligence approach is reviewed periodically to ensure it remains appropriate to the size, nature, and risk profile of our business.

Stakeholder engagement and continuous improvement



We recognise that preventing modern slavery requires collaboration with relevant stakeholders, including suppliers, industry peers, and sector bodies. Our engagement activities are proportionate to the size, nature, and risk profile of our business and focus on practical dialogue with suppliers and partners where we have the ability to influence outcomes.

We are committed to continuous improvement. Each year we refine our processes based on internal reviews, external guidance, and stakeholder feedback. This includes reviewing supplier risk indicators, refining due diligence questionnaires, and enhancing training materials for those involved in procurement and supplier oversight.

Oversight, reporting, and remediation

NUSO CLOUD UK LIMITED maintains processes to enable concerns relating to unethical or unlawful conduct, including modern slavery, to be reported. Reports may be raised internally or, where appropriate, by third parties through designated reporting channels.

Any reported concerns are assessed and investigated proportionately. Where issues are substantiated, we take appropriate action, which may include working with suppliers to implement corrective actions or disengaging where remediation is not possible. Retaliation against individuals who raise concerns in good faith is not tolerated.

Although no confirmed instances of modern slavery were identified during the reporting period, we apply a consistent process to investigate any concerns raised and take proportionate action where issues are substantiated.

Measuring effectiveness and key performance indicators

We review and evaluate the effectiveness of the steps we take to prevent modern slavery on an ongoing and annual basis. Key performance indicators for the reporting period include:

- the proportion of new suppliers that confirmed compliance with our Supplier Code of Conduct prior to onboarding
- the share of suppliers identified as higher risk that were subject to enhanced assessment or follow-up
- the number of supplier engagements where modern slavery risk factors were discussed and documented
- the number of concerns raised through internal reporting channels and the outcomes of investigations
- the percentage of relevant staff who completed modern slavery awareness training during the reporting period



KPI outcomes are reviewed by senior management as part of periodic governance reviews and inform decisions relating to supplier engagement, training priorities, and process improvement. During the reporting period, no confirmed instances of modern slavery were identified within our operations or supply chain.

Awareness and capability

We recognise that awareness is an important component of prevention. We provide:

- modern slavery awareness as part of employee onboarding
- guidance for staff involved in procurement and supplier management
- access to relevant UK Government and external guidance materials

Our approach to training and awareness is reviewed periodically to ensure it remains appropriate to our size, sector, and risk profile.

Accountability and review

Responsibility for this statement and for oversight of modern slavery risk sits with senior management. The statement is prepared for each financial year and is reviewed and updated annually to reflect changes in our business, supply chain, and regulatory expectations.

This statement was approved by the Board of Directors of NUSO CLOUD UK LIMITED on January 9, 2026.

Signed by: Matt Siemens Chief Executive Officer, on January 9, 2026.

NUSO CLOUD UK LIMITED