

**WORKSPACE GROUP PLC**  
**SECTION 54 MODERN SLAVERY ACT STATEMENT**  
**FOR THE FINANCIAL YEAR 1 APRIL 2018 TO 31 MARCH 2019**

**Introduction**

Workspace Group plc ("**Workspace**") is committed to conducting its business in a lawful and ethical manner. Workspace will not tolerate slavery and human trafficking and applauds efforts being made globally to eliminate such practices. Workspace expects its suppliers, contractors and service providers ("**Suppliers**") to also support such practices.

This Statement is made by Workspace Group PLC on behalf of itself and Workspace 14 Limited, being the two entities within the Workspace Group that are required to make a Section 54 statement in respect of the financial year ending 31 March 2019. It sets out a summary of the steps Workspace has taken and is currently taking to help prevent slavery and human trafficking in its business and supply chain. It is published in accordance with the reporting obligation in the Modern Slavery Act 2015 ("**MSA**").

Notwithstanding the steps Workspace is already taking to help prevent slavery and human trafficking, Workspace views the steps being taken as an evolving process and will continue to monitor and review its risk profile and the steps being taken to improve and strengthen its practices.

**1. Organisational structure, business and supply chains**

Workspace is a FTSE 250 Real Estate Investment Trust which owns over 65 properties across approximately 3.9m sq. ft. in London and provides our customers with tenant leases, Club Workspace membership for co-working and Meeting Rooms booking services. We also offer and run a variety of networking events and facilitate members' benefits and perks for our customers.

Workspace provides a home to thousands of new and growing companies, creating communities of entrepreneurs and fast-growing companies in our business centres and giving customers what they need to help them grow.

**2. Policies**

To help prevent modern slavery or human trafficking in our business and supply chains we have adopted an Anti-Slavery Policy which sets out our position on the issue. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity and to implementing effective systems and controls to prevent any slavery and human trafficking from taking place in our business and supply chains. We will monitor and update the policy as necessary.

Our standard Supplier contract terms contain specific clauses which require our Suppliers to warrant that they will comply with the MSA and our Anti-Slavery Policy and the issue is further considered as part of the due diligence we undertake with our Suppliers.

Our Code of Conduct and Business Principles (the “**Code of Conduct**”), a copy of which is provided to our Suppliers, sets out our commitment to upholding, in our business operations, the internationally accepted standards on human rights, labour and employment laws including legal requirements related to minimum wage.

The Code of Conduct and Anti-Slavery Policy also applies to all our employees and to permit a proper understanding of the risks of modern slavery and human trafficking, we provide training to relevant members of staff on the policy. All directors are briefed on the subject and review this statement on an annual basis.

### **3. Suppliers Due Diligence**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Workspace expects all of its Suppliers to act ethically and with integrity and to have in place effective systems and controls to prevent modern slavery from taking place anywhere in their own business or in any of their supply chains.

Before a new Supplier is approved, Workspace will carry out appropriate due diligence on the Supplier, including requiring the Supplier to submit an ‘Approved Contractor & Supplier Application Form’. As part of this process, Workspace will review the Supplier's policies and systems on anti-slavery and human trafficking. Where a Supplier does not provide a copy of their policy, then a copy of the Workspace anti-slavery and human trafficking policy will be made available to them. New Suppliers will only become approved Suppliers once Workspace has completed its due diligence.

### **4. Risk Assessment and Management within our business and in our Supply Chain**

Our business is predominately within the UK and accordingly our geographic risk of slavery and human trafficking is considered to be low. We see our main sector risks as being construction, food and drink and security, cleaning and maintenance. We contract with a number of, mainly UK-based, Suppliers in these sectors.

For material Suppliers, Workspace endeavours to include contractual clauses within its agreement with the Supplier placing contractual obligations on the Supplier to monitor that its own Suppliers comply with the law on anti-slavery and human trafficking. Workspace also endeavours to seek appropriate rights to audit Suppliers to check compliance.

Our Suppliers are contractually obliged to inform us as soon as they become aware of any breach or potential breach of the MSA or our Anti-Slavery Policy and, in particular, any actual or suspected breach in their supply chain in relation to the services they provide to Workspace.

### **5. Effectiveness of our Anti-Slavery processes**

Workspace has in place its Code of Conduct and Anti-Slavery Policy with which Workspace's Suppliers are expected to adhere. Workspace also has the right to carry out audits to monitor compliance and the right to require periodic certification on compliance.

Workspace views any breaches by a Supplier of Workspace's policies or the Supplier's contractual commitments very seriously. Breaches may result in Workspace requiring an immediate remediation plan. Workspace may also terminate its relationship with any Supplier that is in breach or fails to cooperate with remedying a breach.

## **6. Training**

Our Code of Conduct and Anti-Slavery Policy contain specific provisions on human rights, employment rights and anti-slavery practices which is discussed with new employees on induction and generally, as part of ongoing training Workspace delivers to its employees during the year. As part of this year's review of the Workspace Whistleblowing Policy, we have added these issues to those that can be reported to our confidential Whistleblowing Hotline.

In addition to the anti-slavery terms in our standard Supplier contract terms, we have a Supplier Code of Conduct which sets out Workspace's expectations of its Suppliers, including in relation to anti-slavery and human trafficking.

We will continue to monitor the above safeguards and consider implementing further measures as required.

This statement was approved by the Board of Workspace Group PLC on 25 April 2019.



Graham Clemett

Chief Financial Officer

13 May 2019