

**WORKSPACE GROUP PLC**  
**SECTION 54 MODERN SLAVERY ACT STATEMENT**  
**FOR THE FINANCIAL YEAR 1 APRIL 2021 TO 31 MARCH 2022**

**Introduction**

Workspace Group plc (“**Workspace**”) is committed to conducting its business in a lawful and ethical manner. Workspace will tolerate neither slavery nor human trafficking and applauds efforts being made globally to eliminate such practices. Workspace expects its suppliers, contractors and service providers (“**Suppliers**”) to also support it in eliminating 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 2022. 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 chains. 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 approximately 4 million sq. ft. in London and provides our customers with tenant leases and meeting room 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 or 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.

We publish a Supplier Code of Conduct on our website which, among other things, sets out our expectation that our Suppliers comply with the MSA and all applicable human rights and

employment laws. New suppliers are directed to where they can find the Supplier Code of Conduct.

Our Anti-Slavery Policy also applies to our employees, and we also have an Employee Code of Conduct which explains that all members of staff are expected to work with us to uphold our commitment to preventing slavery and human trafficking in our business and our supply chains. To permit a proper understanding of the risks of modern slavery and human trafficking, we provide training to all new members of staff during staff inductions. All Directors are briefed on the subject and review this statement on an annual basis.

### **3. 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, child 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 and Suppliers are directed to the Supplier Code of Conduct. 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 within the UK and all our direct employees are based and employed entirely within the UK and paid the London Living Wage or above. Accordingly we consider the risk of slavery or human trafficking occurring within our own business to be very low.

In our supply chains, 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. All our third-party contractors are now required to pay the Living Wage.

For material and higher risk 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.

As part of this, we endeavour to contractually oblige these Suppliers 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**

We take a zero-tolerance approach to modern slavery and human trafficking in our business. During the year we have not identified any instances of modern slavery or human trafficking in our business.

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 seek to terminate its relationship with any Supplier that is in breach or fails to cooperate with remedying a breach.

## **6. Training**

Our Supplier Code of Conduct, Employee Code of Conduct and Anti-Slavery Policy contain specific provisions on human rights, employment rights and anti-slavery practices. Training on these documents is provided to all new starters as part of their induction programme and periodic reminders are sent to all staff as appropriate.

Our Whistleblowing Policy specifically highlights that our employees can report issues relating to slavery, servitude, forced and compulsory labour and human trafficking, whether within Workspace or its supply chain, to our confidential Whistleblowing Hotline. Our Supplier Code of Conduct also contains details of where Suppliers and their employees can report any concerns of inappropriate conduct, including in relation to modern 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 26 May 2022.



Graham Clemett

Chief Executive Officer

15 June 2022