

Modern Slavery Act Statement

2015/16

Section 54 Modern Slavery Act Statement

For the Financial Year 1 April 2015 to 31 March 2016

1. Introduction

Workspace Group plc (“Workspace”) is committed to conducting its business in a lawful and ethical manner. In particular, 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 sets out a summary of the steps Workspace 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.

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.

2. Organisational structure, business and supply chains Total Emissions

Workspace is a FTSE 250 Real Estate Investment Trust which owns over 65 properties across approximately 4m sq. ft. in London. Workspace provides a home to some 4,000 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.

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 suppliers in these sectors.

3. Policies and Training

To help prevent modern slavery or human trafficking in our business and supply chains we have adopted an Anti-slavery Policy which reflects 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 help ensure slavery and human trafficking is not taking place in our business and supply chains. We will monitor and update the policy as necessary.

We expect all of our Suppliers to comply with our Anti-slavery Policy and a copy of the policy has been sent to our Suppliers following its launch.

The Policy also applies to all of our employees and to ensure proper understanding of the risks of modern slavery and human trafficking, we provide training to relevant members of staff on the policy. All directors have also been briefed on the subject.

4. 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, contractors and service providers to act

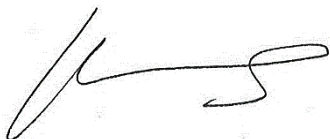
ethically and with integrity and to have in place effective systems and controls to ensure modern slavery is not taking place anywhere in their own business or in any of their supply chains.

We have implemented the following safeguards with our suppliers:

1. **Due diligence** – Before a new supplier, contractor or service provider 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.
2. **Workspace Policies** – Workspace has put in place a Supplier Code of Conduct and an Anti-Slavery and Human Trafficking Policy. These policies set out Workspace’s expectations of its suppliers, including in relation to anti-slavery and human trafficking. Suppliers are expected to adhere to these policies. Workspace also has rights to carry out audits to ensure compliance and the right to require periodic certification on compliance.
3. **Contractual Measures** – For our material suppliers, Workspace will endeavour to include contractual clauses within its agreement with the supplier placing contractual obligations on the supplier to ensure it and its own suppliers comply with the law on anti-slavery and human trafficking. Workspace will also endeavour to seek appropriate rights to audit suppliers to ensure compliance.
4. **Breaches** – Workspace will view 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.

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

By Order of the Board



Jamie Hopkins
Chief Executive Officer

27 September 2016