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Modern Slavery Act 2015: Modern Slavery and Human Trafficking Statement

April 2020

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Summary

This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2015. This statement encompasses all group companies of Instant Offices (Holdings) Limited up to our financial year end of July 2020.

We are committed to improving our practices to combat slavery and human trafficking. We are dedicated to understanding the risks and taking appropriate steps to ensure that there is no modern slavery in our business and with our suppliers.

Our Executive Board has overall responsibility for ensuring compliance with this Modern Slavery Statement.

About Instant

We are a workspace innovation company. We operate globally providing our clients with flexible workspace solutions. Our head office is based in London, United Kingdom. We also have regional hubs in Newcastle, Berlin, New York, Dallas, Sydney, Hong Kong and Singapore. The Instant Group has over 200 employees worldwide and operates in 153 countries.

Our supply chains include firms that provide elements of workspace lifecycle which includes design, fit out and facilities management.

Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking either through our core suppliers or in any part of our business. Our approach is embedded within our policies and employment practices. Our procurement team are responsible for managing the supplier relationships.

We expect our suppliers to comply with all laws and regulations including anti-slavery and human rights principles in employment. The policies and processes we have in place to help us identify and mitigate risk areas including:-

- In accordance with our Procurement Policy and supplier selection process, suppliers complete a Pre-Qualification Questionnaire which assesses the supplier's level of compliance with relevant requirements and outlines their approach to managing their own supply chain to comply with the requirements of the Master Services Agreement
- Suppliers are required to comply with our Supplier Code of Conduct which includes anti-slavery and human rights commitments as well as obligations relating to fair labour practices
- We review the Global Slavery Index (Walk Free Foundation) prior to expansion into new territories and determine action plans where necessary

Monitoring Compliance

The following supplier management processes and steps enable us to ensure that our suppliers do not engage with any kind of slavery and human trafficking practices:-

- Major Supplier Annual Review – We carry out an annual review which includes checks on supplier performance, policies and compliance with our Supplier Code of Conduct
- Supplier Staff Vetting - We conduct ad hoc checks on our major suppliers for compliance with relevant employment regulations including verifying that suppliers are paying local minimum wage
- Contracts - We seek to include anti-slavery commitments in all supplier contracts retain rights to audit our suppliers
- Whistleblowing – we have a whistleblowing policy which allows staff to raise concerns confidentially.

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Instant
RETHINKING WORKSPACE

April 2020

Within the business, our operations and legal divisions work together to ensure compliance with our anti slavery and human trafficking policy. We can measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or within through our core suppliers by:

- Assessing the risk through the annual audits we carry out on our core suppliers
- Our requirement on suppliers to provide evidence that they have carried out appropriate staff training sessions
- Our requirement on suppliers to provide evidence of subcontractor inspections and/or audits where appropriate.

Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that here is no slavery or human trafficking in our own business of through our suppliers, we intend to take the following further steps to combat slavery and human trafficking:

- Implement training for, operations staff and any other relevant staff
- Further enhance our supplier selection and onboarding processes
- Enhance due diligence steps as we expand our business into new territories including our procurement processes
- Include additional checks within our audit process to help identify potential risk areas
- Develop appropriate procedures for high risk countries

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Instant Group's slavery and human trafficking statement for the financial year ending 2020.

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Tim Rodber
CEO

The Instant Offices (Holdings) Limited

Date: April 2020