Modern Slavery Act 2015: Modern Slavery and Human Trafficking Statement

March 2021

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 Green (Topco) Limited as at 31 March 2021.

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 business and supply chains.

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

About Instant

Founded in 1999, The Instant Group is a workspace innovation company that rethinks workspace on behalf of its clients injecting flexibility, reducing cost and driving enterprise performance. Instant places almost 8,000 companies a year in flexible workspace such as serviced, coworking or managed offices including Amex, Barclays, Prudential, Booking.com, Shell, Jaguar Land Rover and Worldpay making it the market leader in flexible workspace.

Its listings' platform www.instantoffices.com hosts more than 15,000 flexible workspace centres across the world and is the only site of its kind to represent the global market, providing a service to FTSE 100, Fortune 500, and SME clients.

In 2019 Instant acquired Incendium Consulting Ltd, an independent corporate real estate consultancy that provides large real estate services procurement, consulting, talent and change management programmes to blue-chip clients. Together, Instant and Incendium give clients access to independent market-leading consultancy, world class data and delivery options that transform their approach to workplace in what is a truly distinct offer in the market.

With offices across the globe including London, Paris, Berlin, New York, Chicago, Dallas, Miami, San Francisco, Hong Kong, Sydney, Singapore and Kuala Lumpur, Instant employs over 250 experts and has clients in more than 150 countries. Instant is ranked #33 in the 2019 Sunday Times HSBC International Track 200.

Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our supply chains include firms that provide elements of workspace lifecycle such as design, fit out and facilities management. Our approach is embedded within our policies and employment practices. Our Head of Supply Chain and Group COO have joint responsibility for managing the supply chain 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 include the following:-

- 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 anti-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 and retain rights to audit our suppliers
- Whistleblowing - we have a whistleblowing policy which allows staff to raise concerns confidentially.
- Enhanced supplier selection and onboarding processes
- Enhanced due diligence steps as we expand our business into new territories including our procurement processes

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 our core suppliers by:

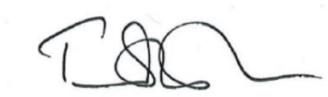
- Assessing the risk in our supply chain through the annual audits we carry out on our major suppliers
- Our requirement on suppliers to provide evidence that they have carried out appropriate staff training sessions
- Our requirement on suppliers to provide evidence of subcontractor inspections and/or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

Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Implement training for key supply chain, operations staff and any other relevant staff
- 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.



Tim Rodber
CEO

Green (Topco) Limited

Date: March 2021