

Modern Slavery Act Statement

Introduction and Purpose

The Modern Slavery Act 2015 (the "Act") is a UK law which came into force in 2015. The Act requires commercial organisations with an annual turnover of more than £36 million, to publish a slavery and human trafficking statement for each financial year. **easyHub**[®] is part of the Newable Group. This is **easyHub**[®] first Modern Slavery Act Statement and **easyHub**[®] is fully supportive of the Act. As required by the Act, this statement sets out the steps taken during the financial year ended 31 March 2021 to combat slavery and human trafficking in our business and supply chains, and the further steps that we will continue to take.

easyHub[®] has a zero-tolerance approach to any form of modern slavery. **easyHub**[®] is committed to acting in an ethical manner, with integrity and transparency in all business dealings and is committed to putting effective systems and controls in place to safeguard against any form of modern slavery or human trafficking, taking place within our business or supply chain.

Our commitment to our clients is very clear, we will always treat people in our business or supply chain fairly. **easyHub**[®] expects its employees, suppliers and business partners to act responsibly and to comply with the requirements of this statement.

Our Business Activities

easyHub[®] delivers and manages a range of branded solutions and have a proven track record of providing profitable, bespoke flexible workspace solutions for building owners.

Our flexible workspace focuses on giving individuals and businesses the independence, flexibility, control, support and confidence to create, run and enjoy their business.

Our Supplier Due Diligence Practices

easyHub[®] suppliers are predominantly based in the UK and are local. Our supply chain includes supply in the provision of office space, construction and maintenance and repair; and also providers of other services necessary to run our internal functions effectively, such as IT, payroll and facilities.

Our employees who arrange significant contracts with suppliers will be requested to consider the risk posed by a new supplier prior to the commissioning of any new supplier, which will consider slavery and human trafficking risks prior to entering into significant new partner or supplier contracts. We have a

separate Supply Chain Transparency Statement which our current and future suppliers will be asked to sign to confirm that they are aware of the Act and will comply with the Act, in order to reduce or remove the risk of slavery or human trafficking in their own businesses. Potential additional due diligence will be undertaken by the easyHub Health & Safety Compliance Manager for those suppliers deemed higher risk.

All procurement is based on objective and fair criteria that reflect the principles of non-discrimination, equal treatment, transparency, procedural fairness, mutual recognition, proportionality and business efficiency. In addition to carrying out due diligence on suppliers, as part of any tender process (where applicable) suppliers are expected to confirm their agreement to our contractual terms and conditions, and confirm that they will comply with **easyHub**[®] policies and procedures and provide the services in accordance with all applicable laws and regulations.

easyHub[®] expects its suppliers to exercise due diligence along its Supply Chain. **easyHub**[®] has the right to end its relationship with a supplier if the supplier does not comply with these requirements or take alternative action if the supplier is not able to prove to **easyHub**[®] satisfaction, that it has implemented immediate countermeasures to prevent comparable violations occurring in future. **easyHub**[®] will require its suppliers to confirm that they comply with all laws relating to slavery and human trafficking and to undertake that there is no trafficked, bonded, child or forced labour within their supply chain. **easyHub**[®] has the ability to terminate the relevant supply contract immediately if the supplier does not comply with these requirements.

Suppliers will be requested to notify **easyHub**[®] prior to sub-contracting any significant services, and that they will ensure that any sub-contractors also comply with the Act. **easyHub**[®] may request the right to audit suppliers where deemed necessary, and to potentially terminate contracts based on any unfavourable results.

Our Employees

easyHub[®] treats its employees with respect and dignity and operates internal policies to ensure that it is conducting its business in an ethical, considerate and transparent manner. **easyHub**[®] recruitment policies ensure that employee screening checks are carried out to ensure that the individual is legally entitled to work in the UK to safeguard against human trafficking or individuals being forced to work against their will, and expects the same of each of its suppliers. Employees are free to leave their employment after reasonable notice and are not required to lodge deposits of money or identity papers with their employer. The compensation and benefits paid to employees for a normal working week

comply at least with guaranteed minimum legal requirements, including minimum wage legislation and working hours comply at least with the national legal standards and are not excessive.

easyHub® has a whistleblowing policy intended to encourage and enable employees to report suspected wrongdoing and raise serious concerns within the workplace. easyHub is committed to ensuring that any employee concerns are taken seriously and investigated.

Further Steps and Employee Training

Following the publication of our first Modern Slavery Act Statement, **easyHub**® will develop a broader understanding of the areas within our businesses that require further focus to identify potential risks which relate to modern slavery and human trafficking. To ensure that there is a high level of staff awareness of issues relating to modern slavery and human trafficking, **easyHub**® expects its staff to be aware of modern slavery and human trafficking legal requirements.

The Newable Group Board have approved this statement and will review and update it as necessary on an annual basis. This statement will be published on the **easyHub**® website.

Steve Jude

Chief Executive Officer

A handwritten signature in black ink, appearing to read "S. Jude", written over a horizontal line.

Date: 14th May 2021

easyHub®