

MODERN SLAVERY STATEMENT

Organisation

This statement applies to SpaceandPeople plc (referred to in this statement as 'the Group').

Organisational structure

The Group markets, sells and administers promotional space as well as on-mall and short-term retail space in high footfall venues, including shopping centres, garden centres, city centres, retail parks and train stations. We match brands, promoters and retailers to the venues and footfalls that are right for them. We perform this business principally in the UK and Germany.

The Group has an annual turnover of £5.8 million.

Definitions

The Group considers that modern slavery encompasses:

- human trafficking;
- forced work, through mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- being dehumanised, treated as a commodity or being bought or sold as property; or
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and Germany and in all cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Group include those related to the selling, administration and fulfilment of promotional space and short-term retailing, the

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Group ensures that all suppliers are reputable companies that are themselves compliant with the Modern Slavery Act 2015.

Potential exposure

The Group considers that its exposure to the risk of slavery and human trafficking is low given that the vast majority of its activities are performed by its own staff, but is aware that areas of heightened risk are present in cleaning contracts with external suppliers due to the likelihood of labour being sourced from countries where protection against breaches of human rights may be limited.

In general, the Group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- putting measures in place to identify and assess the potential risks in its supply chains;
- undertaking impact assessments of its services upon potential instances of slavery; and
- adopting a zero-tolerance policy towards modern slavery.

Living Wage

The Group has a policy of ensuring that all of its employees and those of its suppliers are paid at least a “Real Living Wage” in relation to the work they undertake for the Group.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation’s obligations.