

Modern Slavery and Human Trafficking Statement

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1. Introduction

Fourfront Group, comprising Area Sq, Sketch Studios and 360 Workplace aims to ensure that there will be a fair and systematic approach to maintaining standards of conduct and performance for all employees within the Group.

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 May 2017 to 30 April 2018.

The statement sets down Fourfront Group's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

2. Organisational structure and supply chains

This statement covers the business activities of Fourfront Group which comprises of: Area Sq Limited, Sketch Studios Limited and 360 Workplace Limited.

For further details of the Company please see respective websites or www.fourfrontgroup.co.uk

The following is the process by which the Company assesses whether particular activities are high risk in relation to modern slavery or human trafficking:

- Recruitment and employment process fully compliant with the Employment Rights Act 1996 and Equality Act 2010.
- Approved and Preferred suppliers vetting process
- Project risk assessments

3. High Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking: The Company does not currently undertake any activities that are considered to be high risk.

Responsibility for the Company's anti-slavery initiatives is as follows:

1.1 Policy statement: The HR Director and Group Operations Director are responsible for creating and reviewing policies. The process by which policies are developed is by looking at best practice and adapting to the needs of the Company.

1.2 Risk assessments: The HR Director is responsible for risk assessments in respect of human rights by a process of ensuring all people practices follow legal requirements.

1.3 Due diligence: Group Operations Director and Group Health & Safety Director are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

4. Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to be

aware of the company's legal duties, staff are expected to report their concerns and management to act upon them.

5. Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking activities in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations [insert links to the relevant Company policy]:

2.1 **Whistleblowing** <http://www.acas.org.uk/index.aspx?articleid=1919> - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains and a whistle blower will be protected in accordance with Public Interest Disclosure Act 1998.

2.2 **Company Disciplinary Policy** (See separate attachment) - The Code of Conduct in the disciplinary policy sets down the actions and behaviour expected of employees when representing the Company.

2.3 **Corporate Social Responsibility (CSR) Policy** (See separate attachment) - The Company's CSR policy summarises [how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

6. Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, including evaluating the risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

7. Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including strict supply chain management and requiring all relevant staff to be aware of the modern slavery act.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Lee Marple

Position: Group Operations Director

Date: 3rd August 2017

Signature:

8. Further Information

If you have any questions regarding the Modern Slavery and Human Trafficking Statement, please contact the Lee Marple, Group Operations Director.