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# **UK Modern Slavery Act Statement**

This statement has been produced in compliance with the requirements of section 54(1) of the Modern Slavery Act 2015. It sets out our stance on tackling modern slavery and reducing the risk of modern slavery and human trafficking in our business and extended supply chain. This report is submitted by WeWork International Limited on behalf of itself and all of its subsidiaries with operations in the UK (together "WeWork"). It also references the operations and policies of WeWork Companies LLC and its affiliates - the parent company of WeWork International Limited - which are designed to mitigate the risk of modern slavery in our global business.

This statement relates to the financial year ended 31 December 2020 along with updates on commitments made for the financial year ended 31 December 2021.

Reflecting this, the following statement sets out:

- The procedures WeWork currently follows to mitigate the risk of slavery or human trafficking in our own business and our supply chain, and
- The work we intend to carry out in the coming year and beyond to further strengthen these processes.

#### About WeWork

WeWork was founded in 2010 with the vision to create environments where people and companies come together and do their best work. Since opening our first location in New York City, we've grown into a global flexible space provider committed to delivering technology-driven flexible solutions, inspiring spaces, and unmatched community experiences. Today, we're constantly reimagining how the workplace can help everyone — from freelancers to Fortune 500s — be more motivated, productive and connected.

Community is at the heart of our mission. We are driven by the goal to empower tomorrow's world at work.

WeWork is home to entrepreneurs, creatives, small and large businesses and each member has access to our global community. Based on the concept of offering space as a service, as of the date of this statement we operate over 800 office space locations across 38 countries and 151 cities, with more than 490,000 memberships. We continuously seek ways to empower our employees to support and connect with local communities, driving positive impact and change to improve the lives of our members, employees and those individuals involved in our wider operations.

We recognize that, as a global company, we have a responsibility to look after and protect the wellbeing and safety of those who work with us and for us. We are committed to working together effectively and being present for and supportive of each other: this commitment

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extends to our employees, our members, our suppliers and the communities in which we operate.

#### Our Core Values

We want to create an environment where our members, guests, employees and suppliers feel safe, supported and in which they can thrive. Our core values enable us to create our life's work, and they are:

# Do The Right Thing.

We know the "right thing" is a deliberate action we must always take, and that it is based on integrity and builds trust with those who we care about, including our people, members, and our community.

### Strive To Be Better, Together.

We've always believed that we are better together. We must operate with a shared purpose to constantly improve and grow and to become better as individuals, as teams, and as a company.

#### Be Entrepreneurial.

To reshape the way the world works, we must be bold, act with courage, and demonstrate the resiliency to push ahead no matter the odds or the circumstance.

#### Give Gratitude.

We will not take anyone or anything for granted. We are grateful for our people, members, and our greater community as well as for the opportunities we have in front of us.

# Be Human, Be Kind.

Collaboration, kindness, and authenticity are essential to our humanity. We must cherish each other and build a community that celebrates each person's unique talents, passions, and backgrounds.

Our commitment to identify and reduce the risks of modern slavery in our supply chain and our wider business operations is a natural and important extension of our mission and values. We have zero tolerance for any instances of forced or bonded labour or human trafficking in our supply chains.

During our on-boarding process, all of our employees are required to read and commit to a number of policies. This includes our Code of Conduct and Ethics which is fundamental to ensuring a safe and fair working environment for all of our people and it underlines the importance of open and honest communication. Our global Sustainability team was established in 2018, with Supply Chain Sustainability as a core pillar. The team collaborates with stakeholders across the company to drive implementation of initiatives to create positive social

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and environmental impact. The five-year strategy established in 2020 identifies core areas for global and regional implementation to create positive change.

We are proud of the impact that we can have on our employees, members and wider communities through delivering our mission. We recognize that being able to choose a career is a privilege and, for many people across the world, is still far from being a reality. As our operations reach more people, we have a great opportunity to bring meaningful change and we will continue to include the eradication of modern slavery in our approach.

# Our Commercial Relationships

Our determination to fight against modern slavery and human trafficking is strengthened by our desire to work only with businesses and individuals that support our mission and share our values. It is important to us to build lasting relationships with our suppliers and we continue to review and enhance our contracting procedures to ensure our business partners are fully aligned with our objectives.

We strive to take all reasonable and practical steps to ensure that our standards are being implemented throughout the businesses of our suppliers and that local legislation and regulations are complied with. We take a risk-based approach to our sourcing practices. We recognise that the nature of our operations means that we contract with some suppliers in industries which have a higher risk index than others for the potential for human trafficking and modern slavery. Examples within our business of these at-risk groups include cleaning providers and construction companies. Where we identify a supplier which we consider to be operating in an at-risk industry or location, we perform additional checks which may include site visits to check the working environment and the labour practices of that supplier.

An ongoing area of focus is our supplier vetting process. In 2019, we implemented a 3rd party procurement platform as part of continued efforts to improve supply chain management and consistency across our procurement processes. We also introduced pre-qualification questionnaires for vetting new suppliers, including social and environmental sustainability questions to evaluate risks and opportunities early in our relationship with suppliers. We will continue to challenge ourselves to seek out solutions to identify as early as possible any incidence of modern slavery or any practice which could facilitate such abuses.

# Policies, Procedures & Training Our Due Diligence Programme

We have established a global, risk-based due diligence programme which informs and guides all of our interactions with suppliers and potential business partners through regular engagement with stakeholders and collaboration with our regulatory and legal teams. Our global procurement policy sets out our approach to the purchasing of those materials, goods and

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services which are essential to the creation and operation of our communities. This policy sets out the mandatory process for engaging the suppliers who will work with WeWork and it sets out our standard for supplier verification, obtaining trade references and securing the contractual relationship. It aims to ensure that we work with reputable suppliers that share our values. To date, the focus of our due diligence programme has been on our own operations, direct suppliers, and business partners globally. When we consider whether to work with a prospective supplier or partner, the first step is to ensure that the supplier is reviewed in accordance with our Supplier Vetting Policy. In addition, we assess the jurisdiction, industry, and any government ties the supplier may maintain, among other key factors. This allows us to create a risk profile which will inform our decision as to whether we engage with the supplier.

When deemed appropriate, suppliers are required to undergo an additional review by our Global Compliance Team. This can occur where we have suppliers or partners operating in a country or industry with a higher risk index in a particular sector and also in the event that our standard diligence checks highlight areas of concern.

During our recent years of growth we have been learning rapidly about our supply chain. We continually assess the efficacy of our due diligence programme and we are committed to enhancing our current due diligence procedures to proactively identify, address, and track negative impacts at all stages of our supply chain. Moving forward, insights from our due diligence programmes and stakeholder feedback will continue to be integrated into our internal processes to help ensure that we have the appropriate policies and management systems in place to prevent, identify, and address potential modern slavery risks across our supply chain.

# Policies Internal Policies

As part of our strategy to identify and mitigate risk in our supply chain, including modern slavery, we operate a range of policies and procedures within WeWork. All WeWork company employees are required to adhere to and comply with our Code of Conduct and Ethics as well as anti-corruption, anti-money laundering, and discipline policies. These policies are based on industry-standard principles and they help us set clear expectations for our employees, suppliers, and other business partners, while also establishing a framework that helps us monitor compliance with our standards. All employees are required to read and acknowledge these policies.

We also maintain policies that address discrimination, harassment, and general workplace conduct. Together, these resources play an integral role towards embedding our values throughout our business.

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# Supplier Policies

As part of our commitment to advance respect for modern working practices throughout our broader value chain, we published a supplier code of conduct ("Vendor Code of Conduct") in 2020 to enhance our existing supplier requirements. The Vendor Code of Conduct applies to all suppliers working on WeWork's behalf and sets forth WeWork's standards and expectations for our vendors across labour and human rights, ethics, environment, and sustainable procurement. The Code requires that Vendors take appropriate measures to ensure that no child labour or forced labour occurs at their place of production or operations. It also places a responsibility upon our suppliers to ensure that sub-contractors or suppliers they work with also have appropriate practices and policies in place to mitigate the risk of modern day slavery and forced labour in their places of production or operations. The standards and expectations established in the Vendor Code of Conduct are the foundations of our Supply Chain Sustainability program and Sustainable Sourcing policies, which are fundamental to increasing accountability throughout our supply chains. The Vendor Code of Conduct is available at <a href="https://www.wework.com/info/vendor-code">https://www.wework.com/info/vendor-code</a>.

The Supply Chain Sustainability program launched a 3rd party desktop audit platform in 2019 to conduct supplier assessments and establish a central tool for communicating scorecards and corrective action plans with suppliers. We will continue to expand assessment to additional suppliers and monitor performance through annual or quarterly reviews.

#### **Employee Reporting**

Modern slavery can be challenging to detect and we recognise that our policies and programmes alone may not go far enough to prevent against the risk of all adverse impacts in our supply chain. For this reason, WeWork actively encourages employees to report any and all suspected violations of our values, Code of Conduct and Ethics, policies or applicable law, including those violations that could arise within our supply chain. Through fostering an environment of openness, collaboration and community, we aim to empower all of our people to speak up and be heard. Colleagues are also able to seek advice from their manager, the Global People Team, the Compliance Team or the Legal Department.

In addition to raising issues through internal processes WeWork also operates a 'Raising Concerns' helpline to enable our employees and partners to report compliance and ethics concerns easily and, if needed, anonymously. The helpline is an important part of our culture of ethics and integrity and is operated by an independent and leading company who provide the facility 24/7, 365 days a year, in a number of languages. Information from reports are collated and shared with members of the Compliance Department. All allegations of improper conduct received through the helpline are promptly and confidentially investigated. Matters are reviewed and oversight of issues is provided by the Investigations Review Committee as well as our Audit

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Committee. To support this facility and to encourage concerns to be raised, we have a strict No Retaliation Policy.

#### **Training**

Training plays a fundamental role in our work to embed our core values and expectations around compliance. We have established formal training programmes for our employees and we continue to evaluate, review and enhance these programmes. These programmes help us to raise awareness of potential issues, to communicate our policies and standards, and to provide our employees, particularly those involved in sourcing, with guidance on issues related to modern slavery and empower them to speak out safely on any risk of other violations. We require employees at all levels in the company globally to complete training in our interactive and updated Code of Conduct and Ethics as well as additional courses on business ethics and workplace conduct. The revised Code requires that we engage ethical partners and vendors, and that all vendors must go through our vetting process. We also have a Whistleblowing Policy and provide a whistleblowing helpline to all employees where concerns can be raised anonymously.

We also operate our Compliance Captains programme. This is a network of colleagues throughout the company and spread across geographic regions who support the Compliance Team in championing compliance matters and training. They are individuals who help to raise awareness and disseminate information on ethics and compliance matters. The programme provides for a two-way dialogue and allows us to ensure that we have eyes and ears on the ground throughout our global operations. We circulate a monthly newsletter to our Compliance Captains, reporting on developments, training opportunities, external events and asking for feedback. We have recently implemented town halls on a global and regional level.

#### Case Study: The Power of Community

# Diverse Founders Programme.

By partnering with UK social enterprise Foundervine, we aim to break down the racial and economic barriers that ethnically diverse founders in the UK and Ireland face, and open our doors so that entrepreneurs – regardless of their background – have access to the opportunities needed to succeed. The Diverse Founders Programme that we have launched together in 2021 has been providing virtual programming and mentoring support for start-ups in the UK and Ireland, as well as hot desk workspace for 12 months, to diverse early-stage entrepreneurs.

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# Refugee programme

We believe that every person should have the opportunity to create their life's work. We're committed to supporting economic opportunities for refugees throughout EMEA by partnering with charities that work with refugee entrepreneurs. In the UK we have partnered with social enterprise TERN (The Entrepreneurial Refugee Network) since July 2019. As part of the collaboration we provide entrepreneurs in the TERN network with access to our spaces and access to our community of members through mentoring, gatherings and business opportunities. By immersing them into our ecosystem we hope to help them grow their business successfully.

# Youth employment programme.

In a world with growing unemployment, we believe that everyone should have equal opportunities to join the workforce. In 2019 we started supporting the world's largest and fastest-growing youth employment charity, Generation. The nonprofit transforms education to employment systems by providing training to unemployed young people that are disconnected from the labor market and struggle to find financial security. Following the training, graduates are ready for specific entry-level roles and are guaranteed an interview with an employer. On average the job attainment rate of the programme within three months after graduation is 80%. We support the programme by welcoming their teams and some of their students in our spaces, connecting employers from our community of members to Generation and opening up our network to the graduates. To date we have supported over 1,000 young people through the programme over five cities, and are expanding the scope of our partnership widely throughout our International region.

# Supporting underserved and underrepresented people in our community

In support of our belief that every person should have the opportunity to create their life's work, in March 2019, WeWork began a collaboration with Change Please to provide barista services in some of our buildings. Change Please initially took advantage of the growing demand for coffee in London, offering people experiencing homelessness all over the city the opportunity to train as baristas. The organisation provides people affected by homelessness with accommodation, training, and employment paying the Living Wage, in a variety of locations to support them to move forward. Since then, we have worked with Change Please to expand their footprint by implementing their baristas in new buildings we have opened in Manchester, Edinburgh, Cambridge and Birmingham, and to our buildings in Paris. Through

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our partnership with Change Please we have supported 75 people out of homelessness. In South Africa, we collaborate with I Love Coffee, a social enterprise that employs and trains deaf young persons to become baristas – part of a movement that helps create a more accessible and independent future for the deaf community. Our ambition is to grow both these collaborations and to continue to explore new opportunities to support underserved or underrepresented groups.

#### **Environmental Action**

At WeWork we're integrating sustainability across our business and making sure that we are great citizens of the cities and communities we are in. This means considering:

- The impact our spaces have on member and employee health.
- The environmental impact we and our supply chain have on climate change, waste and biodiversity.
- The role we can play in creating inclusive opportunities for prosperity through our social impact programmes.

We are committed to reducing the negative social and environmental impact of our spaces wherever possible, and that includes the supply chains and products that make our spaces beautiful. Leather has a high negative impact on the environment and the health of workers who are involved in the tanning and processing. In October 2018, we committed to no longer add new leather (or PVC 'faux leather') furniture and furnishings products to our inventory.

As WeWork continues to expand, we are confident that these global environmental initiatives will positively impact our supply chain and the rights of workers around the world.

# Assessment of Effectiveness in Preventing Modern Slavery

WeWork is a dynamic and fast-growing company with the intention and opportunity to have a significant positive impact on the communities that it touches. We know that we must be particularly alert to new risks and opportunities that will arise as a result of our operations and our expansion. This is a responsibility which we welcome and which we take seriously. We continue to invest in our approach, investing in new talent and new technology to allow us to reflect on, develop and enhance our strategy to combatting modern slavery and human trafficking in our wider business and supply chain. We want to be accountable and transparent about our future goals to improve our current practices. In our previous statement published in November 2019, we set out three commitments for 2020:

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# Our Commitments for 2021 and an update on progress to date

Our progress to date on 2020 commitments:

- Expand implementation supplier assessments of high risk product categories with our 3rd party desktop audit partner and technology platform: We have launched an assessment of our EMEA and APAC vendors with our 3rd party desktop audit partner in June 2020, inviting 79 of our highest risk product category suppliers. Of those, 23 took the assessment averaging a score of 54.2/100, above our 3rd party's average score across all industries of 43.2/100. Our suppliers ranked highest on average in the Labour and Human Rights category, with an average score of 56.5/100 against our 3rd party's average score of 45.7/100.
- Provide employee resources particularly for those involved in sourcing, to understand the new Vendor Code of Conduct and educate on the risks of modern slavery in the supply chain: In 2020 we hosted training sessions for the Global Sourcing & Supply Chain team on our Vendor Code of Conduct. In 2021 we intend to incorporate it into our annual compliance e-learning modules for a wider audience.
- Update and improve our forms of supply and construction contracts across our operations in EMEA to include robust modern slavery commitments: Any suppliers and vendors we contract with on our existing vendor Terms & Conditions are contractually required to represent that they have received and will comply with our Vendor Code of Conduct. This code prohibits the use of forced or child labour. As part of a wider global project, our construction and template contracts are currently being reviewed and will be updated to include the requirement for all suppliers and vendors to comply with our Vendor Code of Conduct.

In continued pursuance of those Commitments, we plan on implementing the following initiatives over the remaining months of 2021 and in 2022:

- Implement an updated Procurement Policy: We will launch a simplified version of our Procurement Policy which will require all new suppliers to be reviewed by the Procurement team. The policy will clearly outline whether a competitive process will be required before selecting a supplier and who should execute. Funnelling all new supplier requests through the Procurement team will create an extra layer of governance. This will be in addition to the standard vendor vetting process we have outlined.
- **Expand the Procurement Function**: We will grow our global Procurement team to oversee more spending and implement processes to track vendor compliance.

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We look forward to reporting on our progress in future modern slavery statements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2020. It has been approved by the Board of Directors of WeWork International Limited on 10 June 2021, who will review and update it on an annual basis or more often as we progress with the objectives set out in this statement.

Docusigned by:

Mathieu Proust

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Mathieu Proust General Manager, UK & Ireland WeWork International Limited June 17, 2021

Last updated on 8 June 2021