



SOHO HOUSE
& CO Inc.

2022 Modern Slavery statement

Organisation structure

Soho House & Co Inc. is a global membership platform of physical and digital spaces that connects a vibrant, diverse and global group of members.

We began with the opening of the first Soho House in 1995 and remain the only company to have scaled a private membership network with a global presence. Members around the world engage with Soho House & Co Inc. through our global collection of Soho Houses, Soho Works, The Ned in London, New York and Doha, Scorpios beach club in Mykonos, Soho Home – our interiors and lifestyle retail brand – and our digital channels. The LINE and Saguario hotels in North America also form part of Soho House & Co Inc.'s wider portfolio.

Modern slavery governance structure

1. Soho House & Co Inc. Board
2. Soho House & Co Inc. Modern Slavery Committee
3. Key Business Divisions including Goods, Textiles, Construction, Property, Retail, IT

Soho House & Co Inc. utilises a wide range of suppliers to assist in the running of our Houses, accommodation, club spaces, workspaces, spa facilities and retail services, as well as for office support functions including but not limited to IT, finance, marketing, design and people & development.

We are committed to ensuring that there is no slavery or human trafficking in any part of our business or supply chain and have created a series of processes to facilitate this commitment.

Our supply chain

Our purchasing and supplier procurement is managed within each Soho House & Co Inc. entity with dedicated purchasing teams in charge of supplier selection and management. For most Soho House & Co Inc. businesses, we have established a committee of individuals responsible for ensuring we are adequately assessing and mitigating against the risk of any slavery or human trafficking within our business, or that of our suppliers. Our smaller businesses without their own committee are supported by the larger entities in these processes. The committee meets on a quarterly basis to discuss any concerns or developments in this area and to ensure we are proactively managing any risk. The committee refers to the Board on an ongoing basis on any key developments.

Policies, processes and monitoring

Supplier code of conduct

In order to ensure our suppliers understand our approach to compliance within our supply chain, including but not limited to our policies on slavery and human trafficking, we have a supplier code of conduct which is sent to all suppliers. The code of conduct is a document we require all our suppliers to comply with and request that they identify any issues of non-compliance with us. If a supplier cannot adhere to the code of conduct, we will review the reasons why and work with them towards full compliance or consider whether we can continue our relationship with them.

We have also launched a new supplier relations portal whereby any new supplier with an interest in working with Soho House & Co Inc. or onboarding with us as a new supplier is asked to agree to our supplier code of conduct as well as certain other compliance processes and procedures.

High-risk suppliers

As we have a large supplier base and it is important for us to identify which suppliers are deemed to be 'high risk' in relation to slavery or human trafficking. We also require a more proactive approach from those suppliers in confirming their compliance and ensuring we conduct appropriate levels of due diligence. A supplier may be deemed high risk by virtue of characteristics such as the product/service type provided to us, the geographical location of the supplier or goods being provided or the spend level and reliance we put on our relationship with that supplier. From a product and services perspective, many of our suppliers are low risk but we would categorise certain suppliers as high risk for example textiles, furniture and certain food types.

To date, the business has identified the following risk areas where attention is being concentrated:

1. The business has a complex supply chain with a large number of suppliers, making the identification of high-risk suppliers important.
2. The sourcing of furniture and textiles plays a significant role in the set-up and design of a House, requiring products or materials which are generally considered higher risk.
3. The business has expanded out of Europe and the US to new geographical locations which are deemed to be higher risk, and so must ensure modern slavery and trafficking are issues that are highlighted early in a project in a new territory.

Our workforce

To ensure that our workforce understands our policies and practices in relation to preventing modern slavery and exploitation, including sexual exploitation, we have in place an employee Code of Conduct specifically outlining our approach, as well as a Human Rights Policy and a Whistleblowing Policy. Our employees are made aware of these policies upon commencing employment with Soho House & Co Inc. entities and are required to sign to confirm that they have read and understood the policies.

Monitoring and performance

To track the effectiveness of our policies and procedures in ensuring the absence of slavery and human trafficking in our supply chain, we are monitoring the following key indicators on an ongoing basis:

1. **Supplier compliance:** the extent of suppliers raising non-compliance issues with our supplier code of conduct.
2. **Other actions taken to ensure robust supply chain assessment:** the extent of audits, site visits, requests for further diligence on suppliers and issues flagged and escalated to the Management Team, Board or Committee.

As part of our diligence processes for certain suppliers, we also conduct supplier site visits. We currently visit all Cowshed suppliers and their factories to check how they are performing. We are undertaking site visits for major suppliers as well as those suppliers we deem high-risk for the remainder of the business. In order to ensure we get a realistic assessment of conditions; we will conduct some of these site visits unannounced. Our retail team audited all of its factories during the first half of 2022. A materials risk assessment analysis has been carried out with the help of third-

party experts in order to create a risk assessment action plan to include Modern Slavery and human rights factors for all Soho Home suppliers.

Training

All employees are made aware of and agree to an anti-slavery policy upon commencing employment with Soho House & Co Inc. and are required to sign to confirm that they have read and understood the policy.

We continue to monitor those individuals we consider could benefit from anti-slavery training as the business continues to grow, particularly individuals working in purchasing or procurement, and those working closely with suppliers and other business partners, to ensure training is implemented and refreshed on a regular basis.

Declaration

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Soho House & Co Inc. to aid in the prevention of modern slavery and human trafficking in its business operations and supply chains during the year ending December 2022.

A handwritten signature in black ink, appearing to read 'Jone', followed by a period.