



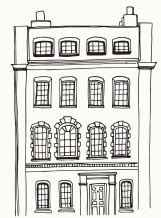
2019 MODERN SLAVERY STATEMENT

ABOUT SOHO HOUSE

Soho House is a global private membership community which was founded 24 years ago by Nick Jones. Soho House provides a home away from home. A place where like-minded individuals can work-out, eat, drink, work and relax.



Since the opening of our first House in Soho, London in 1995, we have grown to 23 Houses across North America, the United Kingdom and Europe. Today, we are a community of more than 100,000 members. As part of a Soho House membership, we offer access to our Houses and host thousands of member events worldwide, spanning film, fashion, art, business and music. In addition to membership fees, we generate revenue from food, beverage and accommodation within our Houses and from other complementary goods and services that we create and provide.



As well as our Houses, the Soho House business consists of Soho Works providing membership-based co-working spaces for creatives. Soho Home provides furniture and homeware used in our Houses' interiors both to our members and the public, along with Cowshed providing spa facilities and treatments (both in Houses and standalone sites) as well as various standalone restaurants, hotels and cinemas open to the public.

SOHO HOUSE MSA GOVERNANCE STRUCTURE



Soho House utilises a wide range of suppliers to assist in the running of our Houses, work spaces, 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 AND POLICY

Our purchasing and supplier procurement is managed within each business division with dedicated purchasing teams in charge of supplier selection and management. We have established a committee of individuals throughout our business divisions who are responsible for ensuring we are adequately assessing the risk of and mitigating against any slavery or human trafficking within our business, or that of our suppliers. This committee meets on a quarterly basis to discuss any concerns or developments in this area and to ensure we are pro-actively managing any risk. The committee refers to the board on an ongoing basis on any key developments.

PROCESSES AND MONITORING

SUPPLIER CODE OF CONDUCT

In order to ensure our suppliers understand our approach to compliance within our supplier 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 something 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.



HIGH RISK SUPPLIERS

As we have a large supplier base, it is important for us to identify which suppliers are ‘high risk’ in relation to slavery or human trafficking we also require a more pro-active approach from those suppliers in confirming their compliance and to ensure we diligence them appropriately. Our various business divisions maintain a ‘high risk supplier matrix’ to identify the suppliers deemed to be high risk. A supplier may be 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 such for example monitoring textiles, furniture and certain food.

Suppliers identified as high risk are asked to complete a questionnaire in addition to confirming compliance with the code of conduct. The questionnaire enables us to diligence these suppliers more carefully and follow up where necessary. Responses are reviewed and dealt with on a case by case basis and assessed accordingly. We will require the questionnaire to be refreshed by those suppliers every two years, although we require suppliers to update us of any changes to the responses provided in the questionnaire in the meantime.



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



1. The business has grown quickly with a large number of suppliers, making the identification of high risk suppliers important.

2. The business does not have one central procurement function to channel a consistent supplier compliance programme through and so co-ordination across departments is key.

3. The sourcing of furniture and textiles plays a significant role in the set up and design of a House – products which are generally considered higher risk.

4. The business is expanding out of Europe and the US to new geographical locations which are higher risk and so must ensure modern slavery and trafficking are issues that are highlighted early in a project in a new territory.

MONITORING

The high risk supplier matrix is subject to review by others internally at any time. Each business division will be reminded at the quarterly committee meetings to update their matrix and to report on any issues of non-compliance or other issues of concern to ensure knowledge-sharing and awareness amongst the business divisions.

As part of our diligence processes for certain suppliers we conduct supplier site visits. We currently visit all Cowshed suppliers and their factories to check how they are performing. We are rolling out site visits for major suppliers as well as those suppliers we deem high risk for the remainder of the business over the forthcoming year. In order to ensure we get a realistic assessment of conditions, we will conduct some of these site visits unannounced.



PERFORMANCE

In order 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:
extent of suppliers identified as high risk and extent of those who raise non-compliance issues with our supplier code of conduct or questionnaire.

2.

Staff training levels:
extent of staff in purchasing and other relevant positions trained on modern slavery and human trafficking and frequency of training.

3.

Other actions taken to ensure robust supply chain assessment:
extent of audits, site visits, requests for further diligence on suppliers and issues flagged and escalated to management team / relevant committee.

TRAINING

All employees are now made aware of and agree to an anti-slavery policy upon commencing employment with Soho House. Further, we have worked closely, and conducted small group training sessions, with business heads.

These individuals include those involved in purchasing or procurement and those working closely with suppliers or other business partners. Each business division has completed questionnaires on their current policies and practices which have been reviewed and feedback provided in small group sessions.

We will continue to monitor those individuals we consider could benefit from training as the business continues to grow and to ensure training is 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 Holdings Limited and other relevant group companies ("Soho House") to aid in the prevention of modern slavery and human trafficking in its business operations and supply chains during the year ending December 2018.

Nick