

Regus plc. “Right-to-Speak”

“provides a confidential way for employees to report fraud, theft, ethical issues, or other misconduct, without fear of reprisal”

Why?

- Employees are often the first to realise that there may be something seriously wrong within the Company. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- “Right-to-Speak” is consistent with our core values, which include honesty, integrity and respect for people. It appeals to the high ethical standards of our businesses and employees. As a loyal employee with strong ethics, you have a right and indeed a responsibility, to report any concerns you may have.
- Wrongdoings for Whistle-blowing purposes include (but not limited to):
 - Criminal activities
 - Fraud or corruption
 - Bribes or facilitating payments
 - Provision of misleading information or the falsification of financial or other records
 - The improper use of confidential, personal or commercially sensitive information
 - Conflicts of interests or unethical behaviours
 - Breaches of copyright, patents, and licences
 - Violation of health and safety legislation
 - Discrimination on the basis of a person’s sex, age, colour, disability, religion, ethnic background, disability, sexual orientation or marital status
 - Failure to comply with other legal obligations
 - Violation of the Regus Code of Business Conduct
 - Breaches of other policies and procedures (including, without limitation, breaches of financial controls and reporting requirements), and
 - Concealing or overlooking any of the above

What can you do?

- If something concerns you about the way your business is being managed or accounted for, or about the activities of an individual, you should first consider whether there is somebody you can talk to locally.
- If you feel unable to discuss it with local management, “Right-to-Speak” gives you the opportunity to voice your concerns, confidentially and anonymously (any correspondence with the “Right-to-Speak” Hotline will be kept in the strictest of confidence).
- Your line manager will not know that you have contacted the “Right-to-Speak” Hotline and we undertake to investigate your complaint promptly, objectively and independently from your line of business.
- You will be protected from reprisals if you make a disclosure, provided your disclosure is made in good faith, no action will be taken against you nor will there be any threat to your career or business prospects. Retaliation or victimisation from any manager or employee in the group because of your disclosure will not be tolerated. There will also be no tolerance of any attempt by any manager or employee in the group to deter an individual from making a disclosure, victimising him or her or making life difficult for him or her because of a disclosure.
- Any individual who makes a disclosure maliciously or malevolently or otherwise in bad faith; or makes a disclosure which is obviously fabricated, false or groundless; or makes a disclosure principally for the purpose of obtaining payment or to damage the reputation of a fellow employee or for personal gain, may not be protected by this policy.
- If you have a personal grievance, or any other complaint which is employee specific (for example, rate of pay, bonus, terms of employment), you should use the process in your company to handle such matters rather than the “Right-to-Speak” Hotline.

Using the Regus “Right-to-Speak” Hotline

Regus has established a confidential hotline that will help address any conduct and ethical issues. To file a report, simply go to www.ethicspoint.com and click on the link to “File a new report”. Type in “Regus” and you will be directed to the dedicated, secure-hosted web page for Regus employees. You can then choose to speak to an operator or file an online written summary. Additionally, when you file a report you may identify yourself or remain anonymous.

The Regus Business Assurance Director, who reports to the Chairman of the Audit Committee, will oversee all issues reported through this hotline in an independent manner and will provide assistance in clarifying issues and/or investigating any potential breaches of the Code of Conduct and/or Regus policies. All reported incidents will be investigated within the parameters of legislation and will respect the basic human rights of all involved.