



## Modern Slavery Act 2015 - Dam Furniture's Policy and Statement 2021/22

### Introduction

Dams Furniture is a privately owned office and contract furniture manufacturer and wholesaler. We have an annual turnover that exceeds £51M supplying office and contract furniture to our customers in the UK and abroad. Our head office is based in Knowsley, Merseyside, UK.

Customers of Dams Furniture can be divided into the following categories:

- Office Furniture
  - Dealers (general office equipment, office furniture specialists, traditional stationers)
  - Web/Retailers
  - Catalogue
- Contract Furniture
  - Contractors
  - Public Sector

As an organisation we understand that modern slavery is a violation of fundamental human rights and a serious crime. We recognise that people may be deprived of their liberties by another to exploit them for personal or commercial gain which constitutes modern slavery no matter the form it takes (human trafficking, slavery, servitude, or forced and compulsory labour).

At Dams Furniture (including Dams Holdings) we have zero-tolerance for all forms of servitude and forced and compulsory labour including, but not exclusive to, modern slavery and human trafficking within our business and supply chain. We are committed to acting ethically and with integrity in all business activities in full support of the government's objectives to eradicate modern slavery. As a business we have ensured the implementation of effective systems and controls to safeguard against any form of modern slavery, corruption, or bribery taking place within our business.

Our annual statement, attached to this Policy, provides details of how we are continuing to support the government in both our activities, and our management of our supply chains.

We require our suppliers, and other companies we engage with, to ensure their goods, materials and labour-related supply chains are:

1. Clear, transparent, accountable and auditable,
2. Free from ethical ambiguities,
3. In full compliance with the Modern Slavery Act 2015,
4. Provide modern slavery training to internal staff, contractors and sub-contractors.

To eradicate the injustice and cruelty of modern slavery and human trafficking we call upon all organisations we engage with to influence their global supply chains and improve transparency, accountability, and training.

### Guidance and Information

#### Public Reporting Non-compliance

Any individual with reasonable evidence or suspicion of non-compliance with the Modern Slavery Act in regards to the Dams Furniture's supply chain or a third party contractor who we engage with is

encouraged to report their concerns to Lindsey Danson [PublicSector@dams.com](mailto:PublicSector@dams.com) who logs the issue on our Activ software which communicates it to the business and start the investigation process.

If you have information that could lead to the recovery, identification, and discovery of modern slavery or human trafficking victims in the UK, please contact the **Modern Slavery Helpline** on 08000 121700, or use the following links: [How to Report](#) and [Referral and Assessment Form](#).

### **Victim Support**

If you believe you are a victim of modern slavery or human trafficking contact the Victim Supportline. This is a confidential service with trained operators to help you to understand what support is available.

**Website** <https://www.victimsupport.org.uk> ([Modern Slavery](#)) and **Supportline** 08 08 16 89 111

### **Scope of our Procurement Activities**

Our procurement activities take place in England, with our suppliers based in the UK, EU and Far East. Per annum, our total procurement value is in the range of £22m. We maintain direct procurement supply chains for our consumable goods and operational services.

Dams Furniture purchase a wide range of products and services from our diverse supply chain including:

- Furniture components (bases, gas lifts, foam, metal legs, edging tape, boards, etc.)
- Finished goods (seating products, workstations, etc.)
- Facilities management services and utilities
- Communications and IT equipment services (hardware, software, licences)
- Recruitment agencies
- Advertising, communications and marketing services
- Stationary
- Temporary staff and professional services

Any new component supplier wishing to work with Dams Furniture is issued a Pre-Qualification Questionnaire which includes questions specifically targeted at slavery and human trafficking risk. Additionally, all of our Supplier Legal Agreements include the requirement for our supplier to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place within their activities.

We have modified our policy to highlight guidance and information, relevant to organisations we engage with and a wider public audience in line with the Social Value Model, we will continue to build upon this guidance creating timed and resourced plans that are personally assigned in order to achieve the improvements. The Policy itself is worked upon annually with ideas and improvement logged on MS Teams ahead of the December review.

### **Procurement and Tender Process Improvements**

Existing supplier documentation includes the mandatory exclusion of any supplier who has been convicted of an offence under the Modern Slavery Act 2015.

To comply with government procurement regulations we are updating our policies and practices in line with guidance from CCS's Public Sector Compliance questionnaire. In 2022/23 we are piloting

new forms for Social Ethical Management aimed at improving our procurement compliance with our current suppliers.

The process improvements we are implementing we expect to be implemented and monitored as planned over the next few years. However, we are maintaining flexibility should changes occur as a result of the UK's departure from the EU which may alter how we promote procurement opportunities.

### **Due Diligence Improvements**

As part of Dams Furniture's due diligence process key performance indicators are kept on the return of all paperwork related to Modern Slavery, including audits carried out by third parties.

Furthermore, we are seeking to improve our due-diligence capabilities by reviewing the use of a database that provides information on an organisation's criminal convictions.

### **Modern Slavery and Human Trafficking Public Statement 2020/21**

1. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 30 September 2020. Responsibility for the preparation and publication of this statement resides with Matt Aldcroft, Sales Director for approval by the board of directors and is signed off by our Managing Director Chris Scott.
2. This is our fifth annual statement and it contains a summary of progress undertaken during 2019/20.
3. We continue to engage with a number of private and public sector organisations to ensure regulatory compliance in our activities.
4. Our procurement activities take place in England, with our suppliers based in the UK, EU and Far East.
5. We take part in framework agreements; our involvement in which is made available to the wider public sector.
6. The nature of Dams Furniture's actions, engagement and involvement within the manufacturing and office furniture industries means there is a genuine reputational risk if we are seen to support or associate with a corrupt delivery partner or investment / grant recipient.
7. The scope of our procurement activities is summarised above

### **Key Statement Highlights for 2019/20**

1. In the financial year 2019/20 Dams Furniture:
  - Ensured that our supplier auditors identify and report suspicious activity or welfare concerns relating to modern slavery and human trafficking.
  - Increased knowledge with our suppliers with our awareness campaign. We have sought to share best practice; and embed change by:
    - Raising awareness within our supply chain for their requirements under the Modern Slavery Act.

- Identifying additional training requirements for internal staff and researched the best way for this to be delivered in 2022/23.
- Identified that procurement is a powerful tool to influence business practices. We are continuing to research the best procurement database to obtain further information on our current or potential suppliers.
- Built upon and developed specific compliance conditions within our supplier contracts and legal agreements.
- Ensured an exchange of management information to underpin and support compliance being measurable, and allow for the implementation of actions as required.
- Undertook a business risk assessment and reported the findings to our Senior Management Team and Board of Directors.
- Continued “top-down” responsibility and governance for this policy and statement and its’ endorsement from our Senior Management Team and Board of Directors.
- We have identified that we want more measurable KPIs, which in future will run calendar year.

### **Governance - Management Responsibility**

2. Responsibility for the preparation and publication of this policy resides with Matt Aldcroft Sales Director and with board approval is signed off by Chris Scott Managing Director.

We have:

- Reconfirmed management responsibility for this policy and statement.
- Prepared and published this annual statement.
- Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our supply chain with which we regularly engage.
- Raised general organisational awareness by circulating an article to all staff explaining progress in preparing this statement via a company email
- Introduced KPIs to report on Tier 1 and Tier 2 supplier compliance
- Ensured all recruitment is compliancy with not allowing Modern Slavery

We will regularly:

- Report progress to our Senior Management Team and Board of Directors
- Prepare the annual statement
- Undertake internal audits reviewing social and environmental factors
- Carry out supplier audits that review their compliance

3. Our policies and statement are approved by our Senior Management Team and Board of Directors.

### **Policy Review and Statement Approach**

4. We annually review our policy and statement against our activities to establish and maintain best practice in our approach.

We have:

- Evaluated the risk of non-compliance in line with our expanding business activities.
- Assessed emerging case law and best practice.

- Benchmarked our activities against statements and action plans; undertaken by similar organisations. This includes examination and comparison of statements from companies involved in the manufacture and provision of office furniture with similar office furniture-related and supply chain risks.

## **Risk Management**

5. Dams Furniture's approach has been to widen our risk assessment across the business and benchmark our activities and policy statement with other organisations with similar supply/reputation risk issues.
6. The risk of modern slavery and ambiguous supply chains has been identified and is monitored within our corporate risk register.
7. The actions detailed within the policy and this statement form part of our compliance risk mitigation strategy.

In terms of continued risk management, Dams Furniture has completed a review of this policy and statement measuring our activities to understand how our approach follows emerging best practice by:

- Assessing and interpreting recent or emerging case law and best practice.
- Ensuring our statement is proportionate and appropriate in both content and size we compared and benchmarked statements across the wider sector with office furniture-related risks.

Evaluate the risk of non-compliance as part of our risk register.

Undertake a continual risk assessment using multifunctional teams to determine our risk exposure.

8. Reconfirmed that the primary risk is an association with a company with an ambiguous or non-compliant supply chain most likely from the Far East.

## **Risk assessment - Assessing our Risk**

9. Earlier statements concentrated on the risk associated with our internal activities to understand and agree upon required actions. As each large company is required to comply with the Modern Slavery Act, Dams Furniture historically placed significant reliance on our own supply chain to risk assessment and monitor activity.
10. Over the past 5 years Dams Furniture's business activities have expanded, along with our understanding of modern slavery risk across the office manufacturing and supply sector.
11. Our earlier assessments have determined that our primary risk is an association with a company with an ambiguous or non-compliant supply chain most likely from the Far East;
12. Continued assessment of our risk environment, using our procurement team to determine our risk exposure, which indicates that our primary risk remains constant and our controls to mitigate this risk are evolving.

## Risk Environment & Risk Mitigation

13. In the course of our business activities, the potential risk of modern slavery arises from the following key scenarios:
  - The risk that we procure goods or services for our own consumption where there is an unethical supply chain.
  - The risk that we partner alongside organisations with an unethical supply chain.
  
14. This risk is mitigated by;
  - Using vetted and monitored framework panels or suppliers demonstrating compliance with the requirements of the Modern Slavery Act.
  - Reputational risk is mitigated by an up-front compliance requirement in our tender and procurement documentation, enforced at delivery by contractual conditions and agreements; and including appropriate termination clauses.
  - Introduced new processes and procedures in relation to procurement and due diligence, including Dams Furniture's contractual arrangements with the inclusion of a mandatory undertaking from our contractors that they will comply with the provisions of the MSA 2015; confirmation of the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.
  - Added a new clause to our Suppliers' Agreements that permits Dams Furniture to proceed to immediate contract termination in the event of a modern slavery or human trafficking compliance breach by the supplier
  - Produced a process for responding to suspected instances of Modern Slavery
  - Act promptly where a compliance breach has been identified or flagged
  - Continue to feed-back lessons learnt into the compliance risk management process
  
15. Furthermore of the companies who do not produce a MSA statement annually, due to their turnover being below £36 million, we are considering requesting that they produce a statement where they provide goods and services to UK government agency that it has considered its obligations regarding its supply chains.

## **The approach adopted by Dams Furniture ensures:**

### **We have:**

- A clearer understanding of the supply chain risks across our business lines.
- Re-affirmed compliance requirements with the Modern Slavery Act in our tender and procurement documentation.
- Reviewed existing compliance conditions in existing contracts and agreements, including termination clauses.

### **We will:**

- Continue to be vigilant when assessing areas of potential risk within our supply chain.
- Act promptly where a compliance breach has been identified or flagged
- Increase awareness with third parties we engage with by promoting and signposting on-line guidance and compliance tool kits.
- Continue to provide more training and awareness both internally and externally and help in the identification of new areas of risk arising from our wider business activities.
- Fully implement the recommendations of the current review of the Modern Slavery Act 2015
- Engage with other organisations to establish our approach is appropriate and proportionate and to raise awareness across the sector.
- Carry out an examination of the Independent Review of the Modern Slavery act 2015 – Transparency in supply chains to gain further knowledge of the Modern Slavery Act.
- Measure and report progress on the actions above within our 2020/21 statement.

## **Our Supply Chain**

Dams requires all employees working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking, and what should be done if this activity is suspected.

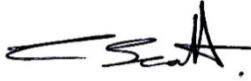
### **Our Policies on Slavery and Human Trafficking**

We operate the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature. Our policy includes specific guidance for employees on how to recognise signs of abuse, including slavery, human trafficking, forced labour and how to respond to and escalate any concerns.
- Business Ethics Policy - our policy sets out the core values which we expect to be observed throughout the Company. Our Supplier Code of Ethical Conduct details the values we expect from our external suppliers
- Supplier Policy - suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Furthermore, we expect our suppliers to provide relevant supporting evidence to justify their statements. We have systems in place to:
  - Identify and assess potential risk areas in our supply chain
  - Mitigate the risk of slavery and human trafficking occurring in our supply chain
  - Monitor potential risk areas in our supply chain

We require all our suppliers to confirm their continued compliance on the above on an annual basis and inform us immediately when there is a change in circumstances. Serious violations of Dams' Supplier Agreement will lead to the termination of the business relationship.

Signed on behalf of Dams Furniture Ltd.

A handwritten signature in black ink, appearing to read 'Chris Scott', with a stylized flourish at the end.

Chris Scott  
Position: Managing Director

Signed date: 23/06/2022