

# Modern Slavery Statement

For financial year ending 30 September 2022

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## 1.0 Scope

The purpose of this statement is to describe the steps Dams Furniture has taken during the financial year to deal with modern slavery risks in our supply chains and our own business.

This is our sixth Modern Slavery & Human Trafficking Statement. It is published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Dams Furniture Limited during the year ending 30 September 2022 to prevent modern slavery and human trafficking occurring in its business and supply chains.

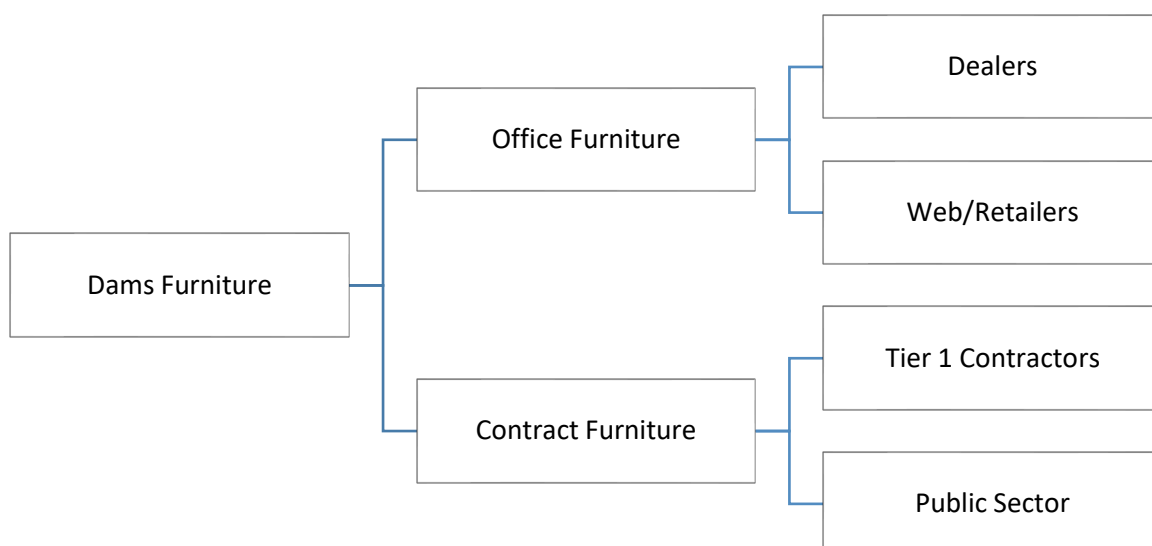
## 2.0 Modern slavery statement

We recognise that modern slavery is a global issue and we are committed to playing our part in supporting its eradication. This document outlines the steps we take as a business to prevent slavery and human trafficking in our own operations and that of our supply chain.

### 2.1 Organisation structure and supply chains

#### 2.1.1 Business structure

Our business structure is as follows:



#### 2.1.2 Supply chains

It is important that we only work with suppliers who share our values and vision, particularly on issues as important as human rights and modern slavery. Our Supplier Code of Ethical Conduct, as detailed below in the policies section, sets out the standards, ethics, rights and responsibilities that govern the relationships our business has with its value chain partners.

We hold regular discussions with key suppliers about working standards within the value chain and, after onboarding, continue to work with each supplier to drive improvement within the business. We are further enhancing our due diligence during the sourcing process to ensure that we appropriately test, measure and score suppliers bidding for new business to ensure we only select those aligned with our values.

Going forward, we have implemented a further strategy whereby we will check for grievance and available escalation mechanisms during site visits and in audits.

Dams Furniture Limited currently operate with a supply chain of circa 220 members, of which around 50% have been validated to ensure they are committed to meeting both legal and ethical standards in their operations, while ensuring that compliance is managed appropriately across their own supply chain partners. As a minimum, we expect both ourselves and our supply chain to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

Our Supply Chain Code of Ethical Conduct sets out these requirements detailing the basic principles of how we will conduct business in an open, honest and transparent manner, and the behaviours and practices we expect of our supply chain, including a commitment to comply with the Act. Our standard terms and conditions include a clause to ensure that all of our supply chain comply. Dams Furniture reserves the right to terminate a relationship with a supplier or third party that is unable to demonstrate compliance or progress towards the eradication of Modern Slavery within its organisation and supply chain.

## 2.2 Policies in relation to slavery and human trafficking

This strategy is also supported by additional policies in our business, they are:

- Supplier Code of Ethical Conduct
  - The purpose of this policy is to clarify and safeguard the relationship between Dams Furniture Limited and its suppliers, to establish standards that ensure our suppliers operate ethically, are environmentally responsible and that workers are treated with respect and dignity. Our suppliers must have processes in place to maintain these standards and be able to provide evidence if required.
  - Our Supplier Code of Ethical Conduct requires our suppliers to adhere to the Modern Slavery Act 2015.
- Recruitment and Selection policy and Labour Human Rights policy
  - These policies apply to all employees, anyone doing business for Dams Furniture and others acting on our behalf. This applies to all locations where we conduct business. The policy stipulates that it is every employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment.

We take any breach of our policies or allegations of labour abuse extremely seriously. We signpost all employees, subcontractors and people working on behalf of Dams Furniture Limited, to the free and confidential government telephone numbers and web-service, whereby they are able to confidentially raise concerns on this matter.

All employees have access to the Employee Handbook, which contains details of all our human rights related policies, such as Whistleblowing, Grievance and Disciplinary policies.

## 2.3 Due diligence processes

We are proud we do business responsibly and ethically. Our Supplier Code of Ethical Conduct, contract terms and governance safeguard relationships between us and our suppliers. We set standards to ensure they operate ethically, are environmentally responsible and workers are treated with respect and dignity. We have had methods of due diligence in place, such as supplier questionnaires and clauses within supplier and partner contracts; which ensure compliance with the Modern Slavery Act 2015.

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

- Conduct business in an open, honest and transparent manner
- Are aligned with us in their behaviours and practices
- Engage with training on modern slavery
- Are in full compliance with Modern Slavery Act 2015.

In addition, as part of our contract with any supply chain member, we ask that our supply chain confirms to us that:

1. They have taken or are taking steps to eradicate modern slavery within their business
2. They hold (or are working towards holding) their own supply chain to account over modern slavery
3. They pay their employees at least the national minimum wage/national living wage (as appropriate).

We are working towards requiring our approved suppliers to provide an annual update confirming their business compliance to the key measures identified in our Modern Slavery policy, regardless of their turnover.

Suppliers are asked a series of due diligence questions. The subjects covered are human trafficking and slavery, health and safety, the environment, data protection, information security and bribery.

Compliance of our supply chain will be monitored via our Procurement process through which we will maintain and monitor supply chain risk exposure including modern slavery. Our Procurement Director oversees this process.

#### **2.4 Risk assessment and management**

Dams Furniture Limited is committed to continually reviewing and updating our approach to identifying and managing risk associated with our supply chain. We have committed to undertaking the following steps to:

- develop learning strategies for employees and supply chain partners to create further awareness throughout the business to ensure that we all drive awareness and understanding of the effects of modern slavery
- continue to enhance our programme of engagement with our supply chain, which identifies areas of high risk, to increase our influence on activities throughout their full value chain
- utilise external resources to support both awareness of risk and development of controls to address this issue across all areas of our internal business and extended supply chain
- ensure that minimum standards identified through our Supply Chain Code of Ethical Conduct are shared across all supply chain members
- enhance our onboard induction process to further highlight the responsibility of all staff and employees in working to identify signs of modern slavery and report these through the appropriate channels.

As an organisation working with multiple suppliers, the risk of modern slavery and human trafficking varies across the business. The following table outlines each the risk profile in relation to our business dealings, in terms of modern slavery and human trafficking. This helps us to identify where the highest risks and pressure points are in the business and where extra focus and resource is needed. This list is regularly reviewed.

High Risk	Medium Risk	Low Risk
<ul style="list-style-type: none"> <li>•Supplier based in high risk country</li> <li>•No Dams self-assessment (in high/medium risk countries)</li> <li>•No Dams audits (in high/medium risk countries)</li> <li>•Audit/self-assessment score of less than 50% (in high/medium risk countries)</li> <li>•No Dams appraisal (in high/medium risk countries)</li> <li>•No records of/staff training in modern slavery (either supplier or Dams issued) including tier 2 suppliers</li> <li>•Far East factories with no/insufficient BSCI or SMETA audits</li> </ul>	<ul style="list-style-type: none"> <li>•Supplier based in medium risk country</li> <li>•No Dams self-assessment (in low-risk countries)</li> <li>•No Dams audits (in low-risk countries)</li> <li>•Audit/self-assessment score of between 50-70% (in high/medium risk countries)</li> <li>•Audit/self-assessment score of less than 50% (in low-risk countries)</li> <li>•No Dams appraisal (in low-risk countries)</li> <li>•Limited records/staff training in modern slavery (either supplier or Dams issued) including tier 2 suppliers</li> <li>•Far East factories with BSCI &amp; SMETA audits</li> </ul>	<ul style="list-style-type: none"> <li>•Supplier based in low risk country</li> <li>•Audit/self-assessment score of between 70-100% (in high/medium risk countries)</li> <li>•Audit/self-assessment score of between 50-100% (in low-risk countries)</li> <li>•Complete Dams appraisal</li> <li>•Full records/staff training in modern slavery (either supplier or Dams issued) including tier 2 suppliers</li> </ul>

To support our commitment, we have during financial year ending 30 September 2022, developed and implemented the following risk mitigation measures:

- embedded our process of annual desk top review for compliance with Modern Slavery requirements for our top supply chain members
- continued our development of modern slavery training to increase awareness of modern slavery across all staff and particularly those engaging in the procurement process
- continued to reinforce our drive to improve both awareness and compliance across all areas of the supply chain through the introduction of a training materials and a compliance survey
- further reviewing and enhancing our onboarding system.

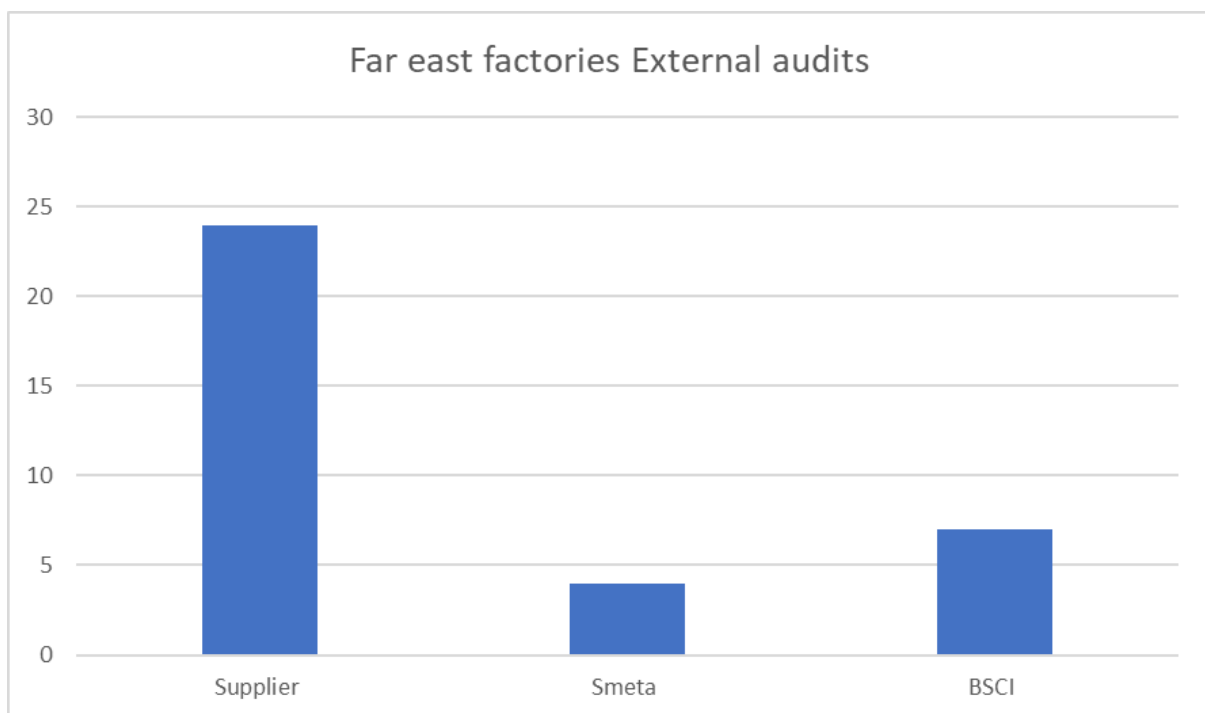
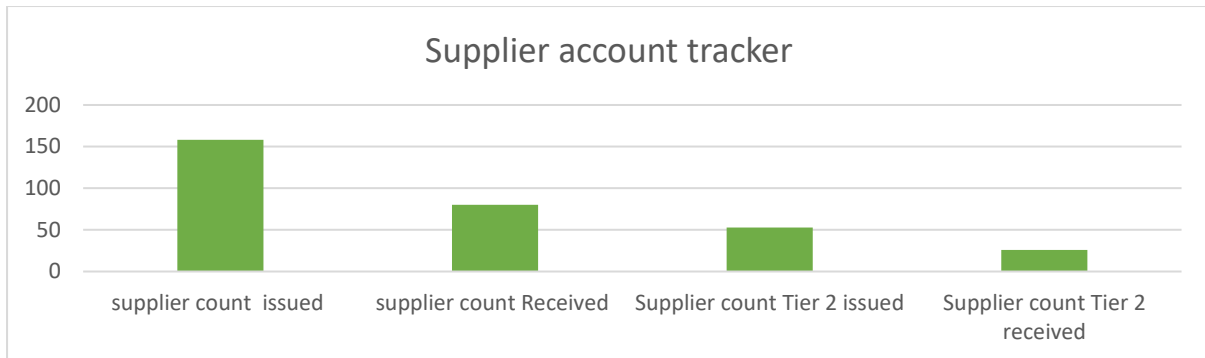
We will record the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain. We will do this through the measurement and escalation of any reports received from employees, our customers, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### 2.5 Key performance indicators to measure effectiveness of steps being taken

We have a robust set of KPIs that are closely monitored to measure the effectiveness of the measures we have in place regarding tackling modern slavery. Our own compliance is ensured through our detailed recruitment process and employee inductions. We work closely with our supply chain and in an open manner, to undertake questionnaires and assessments relating to their work regarding modern slavery. These steps allow us to continuously review our supply chain to ensure they continue to operate with the same standards, ethics and values as Dams Furniture.

The figures below demonstrate the engagement with our supply chain. It is an ongoing process, being lead by our Procurement Director to engage with the remaining organisations to engage in this process.

We have 104 suppliers who have completed our next level checks/validations regarding their operations being both ethical and compliant to the Modern Slavery Act 2015.



### 2.6 Training on modern slavery and trafficking

We provide a training module (delivered as a Tool Box Talk) designed to educate employees on the risk of modern slavery in workplaces, how to spot potential victims of modern slavery and how to report any instances was made available to all employees.

We continue to display posters and other guidance materials, throughout sites to highlight our commitment to preventing modern slavery and provided a direct hotline as well as a whistleblowing contact telephone number.

We continue to utilise industry wide training resources for both our own employees and those of our supply chain. We actively promote engagement in events and briefing sessions. We promote the use of and referral to the Home Office modern slavery awareness booklet, to ensure we are in receipt of

the latest information. <https://www.gov.uk/government/publications/modern-slavery-awareness-booklet>.

We continue to monitor the government website for addition information, that we can then distribute to our employees and our supply chains. This allows us to adapt training modules or information bulletins accordingly and stay abreast of the latest developments. We use the following link: <https://www.gov.uk/government/collections/modern-slavery>.

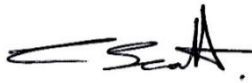
We have issued our modern slavery Tool Box Talk to our top 100 suppliers, which we then ask for feedback from and required a signed document to confirm they have completed the training and subsequent questionnaire. We will roll this out to additional suppliers going forward and monitor the engagement, proactively targeting those who have not responded/returned the required documentation.

### 3.0 Next steps

Dams Furniture is committed to continuous improvement in this area and will review and monitor and, where necessary, enhance our standards, policies and procedures, as well as improve the training and communications about the Act

### 4.0 Declaration

Dams Furniture Limited meets the legal requirement on the Modern Slavery Act 2015. The Board of Dams Furniture Limited has approved the publication of this statement on 22 March 2023. The statement was signed by Managing Director, Chris Scott on 22 March 2023.



Chris Scott

Managing Director, Dams Furniture Limited  
22 March 2023