

Modern Slavery Act 2015 Policy and Statement

Introduction by Chris Scott

We all at Dams International, we have a zero-tolerance to bribery and human trafficking and we are committed to high standards of ethics and integrity, something that follow all our business activities.

We are also committed to ensure that there is transparency in our own supply chain and we are inviting all our suppliers to comply with the standards we set as a company, trying in this way to support not only the governmental regulations but moreover to eradicate the modern slavery and human trafficking.

Organisation Structure

Dams International, is an office and contract furniture manufacturer and wholesaler company. We have an annual turnover that exceeds the £36M and our head offices are in Knowsley Industrial Park, Merseyside, UK.

Dams International is committed to the highest level of ethical standards and set high standards of impartiality and integrity in the management of its activities.

Our business

We supply office and contract furniture to our customers in UK and abroad.

Office Furniture: Our customers, are divided in three main categories:

- Dealers
- Web/Retailers
- Catalogue

Contract Furniture:

Contractors, Public Sector

Our Supply Chains

Dams International procures a wide range of products / services via a 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
- Communications and IT equipment services (hardware, software, licences)
- Recruitment Agencies
- Advertising, Communications & Marketing Services
- Stationary
- Utilities
- Temporary Staff
- Various professional services

Our Policies on Slavery and Human Trafficking

Our procurement activities take place in England. Our suppliers are UK, EU and Far East based. Our total procurement value is in the range of £20M per annum.

We expect our Suppliers and other companies we engage with to ensure their goods, materials, services and labour-related supply chains:

- **Fully comply with Modern Slavery act 2015, and are**
- **Transparent, accountable and auditable; and are**
- **Free from ethical ambiguities**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Suppliers Agreements reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Safeguarding policies include specific guidance for staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour and how to respond to and escalate any concerns.

Due Diligence processes for slavery and human trafficking

As part of the steps taken to ensure complying with the Modern Slavery Act 2015, we have required from our existing suppliers to officially confirm about the transparency in their supply chains. For the new suppliers wishing to collaborate with our company we have issued a Pre-Qualifications Questionnaire which includes questions targeted at slavery and human trafficking risk. In this way we can identify the risk and take all the necessary actions. Moreover, we expect our suppliers to provide the relevant supportive evidence proving their statements.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains

Supplier Adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain (suppliers and sub-suppliers) comply with our values and ethics, we have in place rigorous selection, due diligence and processes which help ensure our suppliers and their supply chains are slavery free. We plan to require all our suppliers to confirm their continued compliance on the above on an annual basis and inform us immediately when something changes.

We encourage anyone, including colleagues, suppliers, sub-suppliers, customers, to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking through our duly authorised Directors.

Steps we have taken (2016)

Management Responsibility and general awareness

We have:

- Agreed management responsibility for this policy and statement from our Senior Management Team and Board of Directors
- Raised general organisational awareness by circulating an article to all staff explaining progress in preparing this statement.

Risk Assessment:

We have:

- Undertaken an assessment using our procurement team to determine our risk exposure.

- Included the Modern Slavery Act 2015 within our Statutory and regulatory compliance risk register to ensure the risk continues to be flagged, assessed and appropriately addressed.

Risk Mitigation:

We have:

- Added a new clause to our Suppliers' Agreements that permits Dams International to proceed to immediate contract termination in the event of a modern slavery or human trafficking compliance breach by the supplier.

Steps to take – (2017-2018)

Management Responsibility and general awareness

We will:

- Report progress to our Senior Management Team and Board of Directors
- Raise awareness of this published statement by notifying organisations with which we regularly engage
- Prepare the second annual statement

Risk Assessment:

We will:

- Commence a review exercise of this policy against our activities to establish whether the approach we have taken follows emerging best practice by:
- Assessing and interpreting any recent or emerging case law and best practice; and
- Benchmarking our activities against statements and action plans undertaken by similar organisations
- Re-evaluating the risk of non-compliance as part of our circular compliance risk register assessment.

Risk Mitigation:

We will:

- Act promptly where a compliance breach has been identified or flagged
- Continue to feed-back lessons learnt into the compliance risk management process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the financial year ending 30th of September 2017.

Chris Scott



Managing Director
Dams International