

Slavery & Human Trafficking Policy

1. Introduction from the CEO

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

2. Organisation's Structure and Principal Activities

The group turnover is £60m-£70m and the principal activities involve providing interior solutions for customers primarily in the Public, Retail and Lifestyle and Corporate Sectors. The Group has its head office in the UK and an office in China.

3. Our Supply Chain

Our supply chain includes the sourcing of raw materials for our UK based manufacturing operations. We also procure a large range of finished products which are sourced from around the world but primarily the UK and China. All of our suppliers go through our quality assurance procedures and must comply with our Procurement Code of Ethics Policy and the ETI base code as published at www.ethicaltrade.org/eti-base-code.

4. Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. This Anti-slavery Policy reflects 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.

5. Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- We build long standing relationships with local suppliers and make clear our expectations of business behaviour.
- Our national and international suppliers are required to demonstrate appropriate anti-slavery and human trafficking policies and processes and for each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- We have an office base in China to help ensure our Far East suppliers are following our Procurement Code of Ethics Policy.
- As members of SEDEX we work with customers and the supply chain to ensure transparency across the business.
- For our operations involving wood we operate "chain of custody" procedures and are members of FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification).
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

6. Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. Each relevant director is responsible for compliance in their respective departments and for their supplier relationships.

7. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to members of staff. All directors have been briefed on the subject.

8. Our Effectiveness in Combating Slavery and Human Trafficking

We take the following practical steps to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of premises audits by Safety, Health and Environmental Managers, Site Managers and the Human Resources Manager.
- Use of labour monitoring and payroll systems to check eligibility of employees in the UK.
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.
- We have an active workers committee and undertake regular briefings to promote a culture of openness and inclusion where individuals can voice concerns.
- We commission bi-annual SEDEX audits of our own factory.

George McAdam
Chief Executive Officer



2 April 19