



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

DFS Furniture PLC



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Version Control

V	Last Modified By	Change Description	Last Modified On
	Liz McDonald	Update approved by the Board	18/09/2025

Review History

V	Document Owner	Review Comments	Review Date
	Liz McDonald	Next review August2027	08/09/2027

Reviewers

V	Reviewer Name	Reviewer Role	Reviewed Date
	Liz McDonald	Chief Legal & Assurance Officer	08/09/2025

Authorised by

V	Approver Name	Approver Role	Approved Date
	Group Board	Board of Directors	18/09/2025



Related Documents

Document Name	Document Location
Whistleblowing Policy	https://www.dfscorporate.co.uk/media/54596/Whistleblower-Policy-approved-23042021.pdf
Group Code of Conduct	https://www.dfscorporate.co.uk/media/53792/Group-Code-of-Conduct-November-2020.pdf
Supplier Code of Practice	https://www.dfscorporate.co.uk/media/61490/DFS-COP-V002a--Aug-2021.pdf
Group Human Rights Policy	https://www.dfscorporate.co.uk/media/57420/Group-Human-Rights-Policy.pdf



1. POLICY STATEMENT

1.1 This policy is approved by the Board of Directors of DFS Furniture PLC on behalf of itself and its subsidiary companies (together “the DFS Group”). The DFS Group has a zero-tolerance approach to the use of modern slavery or human trafficking anywhere within our business or in any of our supply chains.

1.2 Modern slavery is a crime and a violation of fundamental human rights; The Modern Slavery Act 2015 (‘the Act’) consolidates slavery and trafficking offences; it covers four forms:

- Slavery – exercising powers of ownership over a person;
- Servitude – where the obligation to provide services is imposed using coercion;
- Forced and compulsory labour – where work or services are exacted from a person/child under the menace of any penalty and for which the person/child has not offered themselves voluntarily; and
- Human trafficking - where a person arranges or facilitates the travel of another person with a view to their exploitation.

Modern slavery and human trafficking have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. The DFS Group is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.3 The DFS Group is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners; and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.



2. PURPOSE

The purpose of this policy is to:

- (i) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery to prevent human rights abuses, protect vulnerable and exploited workers, and safeguard against any form of modern slavery taking place in any part of our business or supply chain; and
- (ii) provide information to you, as employees of the DFS Group about your responsibility for upholding our position on modern slavery.

3. WHO MUST COMPLY WITH THIS POLICY?

- 3.1** This policy applies to all persons working for the DFS Group or on our behalf in any capacity, including all employees, directors, officers, agency workers, agents, contractors, external consultants, third-party representatives, business partners. We expect everyone to comply with this policy and with our Employee and Supplier Codes of Conduct.
- 3.2** It is a contractual obligation in DFS Group contracts that all third parties will comply with the Act. Should they fail to comply, and we become aware of their failure we will terminate our contractual arrangement with that third party immediately upon notice.

4. RESPONSIBILITY FOR THE POLICY

- 4.1** The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2** Management at all levels are responsible for ensuring that those reporting to them are aware of, understand and comply with this policy and are given adequate and regular training on the issue of modern slavery in supply chains.



5. COMPLIANCE WITH THE POLICY

- 5.1** Colleagues must ensure that you read, understand, and comply with this policy.
- 5.2** The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.3** All suppliers to the DFS Group are required to confirm that they comply with the Act and measures and processes in place to ensure slavery, servitude, forced or compulsory labour and human trafficking does not occur in their companies, or supply chain.
- 5.4** Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 5.5** If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 5.6** If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Company Secretary.

6. COMMUNICATION AND TRAINING

- 6.1** Our policy is available on the corporate website, forms part of our contracts with third parties and is a key element of the Ethical audits we carry out annually on all our suppliers of finished goods.
- 6.2** Specific on-line training on modern slavery is available to all employees, and is mandatory for all employees involved in the procurement of goods and services. Senior employees who are required to undertake the training will be notified individually. Mandatory training must be renewed online annually.



- 6.3 Our commitment to how we do things and how we protect the people working in our business and supply chain is set out in our Group Code of Conduct. All colleagues undergo mandatory training annually on the Group Code of Conduct.

7. PROTECTION

- 7.1 Individuals who raise concerns under this policy are sometimes worried about raising concerns, DFS Group encourages openness, and we will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.
- 7.2 We are committed to ensuring no one suffers from any detrimental treatment because of reporting their suspicion that an offence under the Act or other relevant or equivalent legislation has taken place. If you believe that you have suffered any such treatment, you should contact the People team immediately.

8. AUDIT

To ensure that we have procedures in place to prevent modern slavery or human rights abuses in our business we regularly perform ethical audits of all our suppliers. These checks are carried out by our internal quality assurance team and by specialist auditors, who do regular desktop and physical audits of our suppliers' sites.

8.1 BREACHES OF THIS POLICY

In cases where slavery or human trafficking are identified in our supply chain, we will work with suppliers and partners to create a remediation plan and collaborate with them to deliver it. If we are not confident that the necessary actions have been taken we have the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

9. WHO IS RESPONSIBLE FOR THE POLICY?

- 9.1 The Chief Legal & Assurance Officer has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about it.



9.2 Management at all levels are responsible for ensuring colleagues working across the Group understand and comply with this policy

9.3 This policy has been approved by the Board of Directors' of DFS Furniture PLC. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Adopted by the Board of Directors of DFS Furniture PLC on 18 September 2025