



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

DFS Furniture PLC



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Version Control

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	Liz McDonald	Update approved by the Board	19/1/2023

Review History

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	Liz McDonald	Group General Counsel and Company Secretary	12/01/2023

Authorised by

V	Approver Name	Approver Role	Approved Date
	Group Board	Board of Directors	19/01/2023

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



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 by the use of 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 in order to exploit them for personal or commercial gain. The DFS Group is committed to acting ethically and with integrity in all of 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, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners, sponsors and any other person associated with us, wherever located. We expect all the aforementioned persons to comply with this policy and with our Employee and Supplier Codes of Conduct.



- 3.2** We make it a contractual obligation 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** You 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 will be requested to sign and agree to this policy; agreeing that they will have full measures and processes in place to ensure slavery, servitude, forced or compulsory labour and human trafficking are not occurring in their manufacturing or supply chain(s).
- 5.4** You 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 zero-tolerance approach to modern slavery and human rights abuses is to be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.
- 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 good and services. Senior employees who are required to undertake the training will be notified individually. Mandatory training must be renewed online annually.



- 6.3 Additionally, our commitment to protecting human rights and ensuring compliance with the Act is detailed in our Group Code of Conduct.

7. PROTECTION

- 7.1** Individuals who raise concerns under this policy are sometimes worried about possible repercussions. The DFS Group encourages openness and we will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 7.2** We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that an offence under the Act or other relevant or equivalent legislation has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should contact the People team immediately.

8. AUDIT

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

9. BREACHES OF THIS POLICY

- 9.1** Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 9.2** We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

10. WHO IS RESPONSIBLE FOR THE POLICY?

- 10.1** The Group Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.
- 10.2** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training about the issues surrounding this policy.
- 10.3** 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. This policy will be reviewed at least annually.

Adopted by the Board of Directors of DFS Furniture PLC on 19 January 2023