

Date: 29th January 2020



Modern Slavery and Human Trafficking Policy

Policy Statement:

Purpose

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of the Company with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Act.

As a Company we have a zero-tolerance approach to modern slavery. We are 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 those of our suppliers. To achieve this, the Company ensures transparency within the organisation and with suppliers of goods and services to the organisation.

The Company is satisfied from its own due diligence there is no evidence or act of modern day slavery or human trafficking within its own organisation.

The Business:

Moores Furniture Group (The Company) design, manufacture, provision and install indoor furniture and associated products. The items are primarily constructed from melamine-faced chipboard, medium density fibre-board and other 'wood' products.

The Company, situated on the Thorpe Arch Estate, Wetherby, West Yorkshire, acknowledges the requirement for upholding this policy and is committed to enacting the requirements of the Modern Slavery Act.

Scope:

This policy applies to all Company employees, third party contractors and agency temporary workers assigned to the Company from time-to-time. This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

Responsibility for Implementing this Policy:

Our board of Directors has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. HR has day-to-day responsibility for operating the policy and ensuring its maintenance and review. Managers have a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

Steps for the Prevention of Modern Slavery:

We are 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 we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All team members and suppliers have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas
- Engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses
- Where appropriate, as part of our risk assessment, carry out supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls and document via an internal declaration register
- Hold separate policy and auditing documents, namely: 'Responsible Procurement Policy', 'Equal Opportunities Policy', 'Corporate Social Responsibility Vision Statement', 'Environmental Policy', 'FSC Policy Statement' and supplier assessment documentation. Additionally, through the Immigration, Asylum and Nationality Act 2006, necessitating a number of checks to be undertaken for the eligibility of individuals to work in the UK carried out by our Recruitment Agencies or the Company prior to individuals commencing work.

Communication and Awareness of this Policy:

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Copies of the Modern Day Slavery and Human Trafficking Policy are available to: persons working for or on behalf of the organisation; with copies available to customers and the general public via the Moores website <http://www.moores.co.uk>.

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