

This is our second year Modern Slavery Statement which reaffirms our approach and commitment to preventing modern slavery and human trafficking, in our business and supply chain including a summary of additional measures undertaken during 2017.

Our Business and Supply Chains

We consider ourselves to be a successful and quality focused upholstery design and manufacturing business making furniture for some of the UK's most prestigious furniture retailers.

We directly employ over 1,300 employees and up to 100 agency workers to cope with the fluctuations in customer demand during the course of a year. Our product supply chains are global and we aim to ensure all our products are responsibly sourced.

We undergo regular independent audits at our sites, and carry out regular audits of key Tier One (T1) suppliers, in-line with the Ethical Trade Initiative Base Code. (T1 suppliers are those working on branded products). We also provide a confidential remediation route for all UK based workers, via the 'Stronger Together' whistle blowing service.

Contractual Controls

We are committed to ensuring people are treated with dignity and respect and our approach is to implement the United Nations Guiding Principles on Business and Human Rights (Guiding Principles) and to recognise and manage the risk of harm associated with unsatisfactory working conditions, discrimination, modern slavery, human trafficking and forced or bonded labour.

This commitment is required of our T1 suppliers as a 'condition of business' and is set out in our policies and practices detailing our approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in our operation.

Westbridge Furniture Code of Practice

We believe that our suppliers should adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Key T1 Suppliers will be expected to provide evidence of compliance with our Code of Practice, which requires them to:

- Participate in ethical trading audits / assessments;
- Provide employees with good working conditions, fair treatment and reasonable rates of pay; and
- Respect workers' human rights and comply fully with all applicable laws.

We also require that:

- All work must be voluntary, and not done under any threat of penalties or sanctions.
- Workers must not pay any deposits for work and employers or labour providers must not keep originals of identity documents.



Westbridge Furniture Code of Practice Continued...

- Involuntary labour is prohibited and workers must be free to leave work at any time with all outstanding monies to be paid to them.

Westbridge Furniture Recruitment Policy

We continually review our recruitment policy and practices to ensure that these remain compliant with all UK Legislation. Where possible, we will employ people on a permanent contractual basis and will not employ anyone on a zero hour contract. Before starting employment, all employees will be required to demonstrate their right to work in the UK.

Responsible Use of Labour Providers Policy

We will only contract with labour providers who have an identifiable and legitimate business entity. We will conduct due diligence checks and periodic audits with our labour providers to ensure that they comply with the legal operating conditions (including licensing, certification or other regulation) in that country and sector, and the country where employment takes place. The scope of this policy covers both:

- **Recruitment Services.** Where the labour provider sources workers to be employed by us;
- **Employment Services.** Where the labour provider employs workers and supplies them to us, assigns their tasks and supervises the execution of their tasks.

Training and Awareness

All our managers have received Modern Slavery training covering:-

- The need for transparency in Supply Chains;
- How to assess the risk of Modern Slavery including recruitment and resourcing;
- How to identify signs of slavery and human trafficking;
- How to escalate issues where Modern Slavery is suspected;
- What steps we would take if suppliers or contractors do not implement anti-slavery policies in high risk scenarios, including their removal from the organisations supply chain.

2017 Actions

Building on the measures introduced in 2016, and as part of our participation in the Fast Forward Audit Programme, we have continued to give priority to managing the risks of modern slavery. Amongst the additional actions undertaken include: -

- All members of the HR team attending a 'Compliance Training Course' dedicated to checking 'right to work' documentation.
- Holding quarterly meetings with our main labour provider to review their performance and understand any changes to their methods of resourcing;
- Surveying new employees, recruited via our labour provider, to assess their satisfaction with the recruitment process and to identify any issues or concerns;
- Continuing to raise awareness of the risk of Modern Slavery in communications with our employees e.g. team briefs;
- Incorporating the subject of Modern Slavery into our Traineeship/Apprenticeship Scheme;
- Reissuing our Company Handbook to all employees restating our commitment to anti modern slavery practices;
- Introduced policies affecting young and vulnerable workers. Namely, a Child Remediation Policy and Safeguarding Policy. The latter supported by training of all relevant staff.



2017 Actions Continued...

- Introduced a whistleblowing helpline;
- Attendance at Modern Slavery and Human Rights conferences to remain up to date with current practices and risks.


We have also successfully completed Sedex Members Ethical Trade Audit (SMETA) at each of our manufacturing sites during the year and all our T1 suppliers were similarly audited (i.e. SMETA) with the exception of one which is due to be audited separately.

Assessment of Effectiveness in Preventing Modern Slavery

We understand that the potential for Modern Slavery will need on-going assessment and actions to mitigate risk. As such, our approach is based on continually reviewing the effectiveness of our policies, exercising due diligence when engaging with new suppliers, carrying out audits and performance reviews, and taking seriously any issues or complaints by undertaking appropriate investigations and remedial action.

Declaration of Preventing Modern Slavery

We, the Directors of Westbridge Furniture Designs are committed to the application of this Modern Slavery Statement (Second Year) 2017/18.



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Managing Director (Operations)



Paul Islip
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Date: January 2018

