

# Belfield

GROUP

**MODERN SLAVERY**

**STATEMENT 2017/18**

This statement has been published in accordance with the Modern Slavery Act 2015. This is our second year statement and sets out the steps taken by the Belfield Group during the year ending 31<sup>st</sup> December 2017 to prevent modern slavery and human trafficking in its businesses and supply chains.

## **Introduction**

Belfield Group Ltd and its subsidiary companies are committed to running our businesses responsibly. We strive to maintain high ethical principles and to respect human rights. Within our operations and expect the same high standards within our supply chains.

In this document, we describe our businesses and supply chains, and how we operate them. We explain our current policies and practices, and the plans that we have, to enhance these, in light of the Modern Slavery Act.

## **Our business and supply chains**

The Belfield Group is one of Europe's leading manufacturers, wholesalers and distributors of upholstered furniture, soft furnishings, curtains and mattresses. The Group is a key supplier to some of the UK's leading high street stores and online retailers within the caravan, leisure and home market.

The Belfield Group employs over 2000 employees. Our product supply chains are global and we aim to ensure all our products are responsibly sourced.

The Belfield Group undergoes regular independent audits at its sites, and carry out regular audits of key Tier One (T1) suppliers, in-line with our own Ethical Trade Policy and the Ethical Trade Initiative. (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. Belfield Group Ltd also carries

## **Policies and 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.

We operate the following policies that describe our approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking our operations:

**Ethical Trading Policy** – 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 Ethical Trading Policy, 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 requires 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.
- Involuntary labour is prohibited and workers must be free to leave work at any time with all outstanding monies to be paid to them.

**Belfield Groups 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 only on a permanent contractual basis and avoid using agency provided labour. Prior to commencement of employment, all employees will be expected to demonstrate a right to work.

**Responsible Use of Labour Providers Policy** – We will only contract labour providers which have an identifiable and legitimate business entity. We will verify with its labour providers, the legal operating conditions for labour providers in that country and sector and require confirmation that any system of licensing, certification or other regulation as required by national law and practice is properly complied with. 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 and their tasks and supervisors the execution of their tasks.

We will conduct appropriate due diligence to ensure that the labour provider is compliant with this policy.

#### **Due Diligence and audits of Suppliers and Supply Chain**

Whilst Belfield Group will continue to undergo regular third party audits in line with our customer requirements, we understand that our biggest exposure to Modern Slavery is in our supply chain. Supplier audits are regularly undertaken to assess ongoing ethical compliance.

The audits assess compliance with the ETI Base Code, and are, amongst other aspects, intended to identify any potential Modern Slavery practices. If any potential risk is detected, investigative and remedial action will be taken.

Recognising the limitations of relying on mainstream audits, Belfield Group has now undertaken a new collaborative approach with Labour Providers to build a transparent relationship to encourage regular communication and collaboration. This provides a more pro-active approach aimed at looking at preventative measures rather than reactive measures and remedial action.

#### **Modern Slavery Training and Awareness**

All line managers have been provided with Modern Slavery training covering:-

- 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, during 2017 we have continued to give priority to managing the risks of modern slavery. The additional actions undertaken include: -

- Holding regular meetings with our main labour providers to review their performance and understand any changes to their methods of resourcing;

- Continuing to raise awareness of the risk of Modern Slavery in communications with our employees e.g. employee newsletters and employee rep's meetings.
- Incorporating the subject of Modern Slavery into our employee induction programme;
- 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.
- 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 our manufacturing sites.

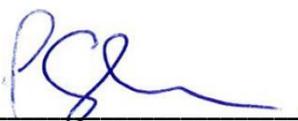
**Assessment of effectiveness in preventing Modern Slavery**

We understand that the potential for Modern Slavery will need ongoing 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.

We the Belfield Group, board of Directors are fully committed to the prevention of Modern Slavery and the application of this Modern Slavery Statement.

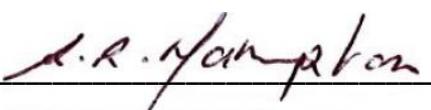
Signed:  **Managing Director (Belfield Furnishings)**

Signed:  **Managing Director (Belfield Design Studio)**

Signed:  **Managing Director (Duflex)**

**This statement was approved by the Board of the Belfield Group.**

Signed:  **Chief Finance Officer**

Signed:  **Chief Executive Officer**

**Date: 06 / 12 / 17**

