



## **MODERN SLAVERY STATEMENT.**

This statement is made pursuant to 54(1) of the Modern Slavery Act 2015 and sets out the steps that Boss Design Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Boss Design Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place with the business or supply chain.

### **Our business**

We are designers and manufactures of office seating. Our head office is based in the UK and we procure from a national and international supply chain. We have manufacturing facilities in the UK, USA and Dubai.

Given the nature of what we do we believe there is a low risk of slavery or human trafficking having a connection with our business activities, but there is no room for complacency in that belief so we have taken the steps detailed below.

### **Our high risk areas**

We have identified the following area of risk –

- Reduced lead times that are beyond our supply chain capability, forcing an increased workforce but with payment below the local minimum wage.
- Leverage in buying power which pushes the purchasing price so low, which could result in workers being paid below the local minimum wage.
- Where the purchasing prices are negotiated so low that this can have a knock on effect for the parties producing the raw material and thus increasing the likelihood of forced labour.

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Human Rights Policy. Boss Design Group is committed to developing an organizational culture which implements a policy of support for internationally recognised human rights and seeks to avoid complicity in human rights abuses. We support the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Core Conventions on Labour Standards.
2. Ethical and Sanctions Policy. This policy obligation is to protect fundamental human rights and to respect the diversity of all cultures,
3. Anti-slavery statement. This statement sets out the organisations stance on modern slavery and explains how employees can identify any instances of this.

4. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
5. Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
6. Code of business conduct. This code explains the manner in which we behave an organisation and how we expect our employees and suppliers to act.

### **Our suppliers**

Boss Design Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes regular site assessments and performance related KPI's. Our anti-slavery statement forms part of our contract with all suppliers and they are required or confirm that no part of their business operations contradicts this statement.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage where applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

### **Training**

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees.
- No reports are received from the public.
- No reports are received from any law enforcement agencies.

Approval for this statement



Brian Murray - Managing Director – 1<sup>st</sup> August 2018