

Belfield

GROUP

MODERN SLAVERY STATEMENT 2019/20



Introduction

Belfield is committed to ensuring that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our businesses and in our supply chains. We take seriously any allegation of human rights abuse in all its forms and will not tolerate human rights' abuse against individuals within our own business or our supply chain.

Modern slavery can take many different forms and is a complex issue. Belfield has taken steps to identify and eliminate the possibility of modern slavery and human trafficking practices occurring within our businesses and supply chains.

This is Belfield's fourth statement made under the Modern Slavery Act 2015 Section 54 and constitutes our group modern slavery statement for Belfield Group Ltd and subsidiary companies during the year ending 31st December 2019.

This statement highlights the key activities we have undertaken during the year and aims to provide useful information to understand our commitment as a responsible supplier to making a positive difference in reducing those modern slavery risks that could be connected to our business.

Our commitment

Belfield Group Ltd and its subsidiary companies are committed to running our businesses responsibly and maintaining high ethical principles. To do this we:

- Continue to take steps to prevent slavery and human trafficking practices occurring within our businesses and supply chains.
- Ensure our policies and procedures are reviewed regularly and that we have development and training processes in place to ensure line managers have appropriate awareness and understanding of the issues and our responsibilities
- Are committed to ensuring that employees, those employed within our supply chain, and those affected by our operations are treated fairly, and that their fundamental human rights are protected and respected.

Our business and supply chains

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.

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.

Policies and contractual controls

Belfield has clear policies and monitoring processes in place which we review and update regularly. Our policies are designed to ensure that people are treated with dignity and respect by upholding internationally recognised human rights principles encompassed in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Our business policies relating to modern slavery are published on our corporate website at business policies relating to modern slavery are published on our corporate website at www.thebelfieldgroup.com, this include;

- Ethical Trade Policy
- Human Rights Policy
- Anti-Bribery and Corruption Policy
- Child Labour, Young Workers and Remediation Policy

Our Ethical Trading Policy – Our suppliers must adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Our top 20 suppliers will be expected to provide evidence of compliance with our Ethical Trading Policy, which requires them to:

- Provide employees with good working conditions, fair treatment and pay rates that meet the minimum legal required standards; 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.
- Involuntary labour is prohibited and workers must be free to leave work at any time with all outstanding monies to be paid to them.

Our Human Rights Policy – We respect human rights and are committed to protecting the rights of our employees, those employed within our supply chain, and those affected by our operations. The policy sets out our approach and standards to fulfilling this commitment, which includes:

- Acting with integrity, fairness and transparency within all our business operations.
- Encouraging openness and honesty in all our relationships and developing constructive relationships with our employees, through communication and engagement activities.
- Prohibiting any form of discrimination, forced, trafficked or child labour.
- Providing a safe and healthy working environment in which their dignity in the workplace is respected.

We also provide a remedial route for customer, suppliers or external parties to report Human rights concerns or grievances.

Our Anti Bribery and Corruption Policy – One of our core values is to uphold responsible and fair business practices and maintain the highest level of ethical standards in relation to all of our business activities.

We are committed to acting fairly and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

Our Child Labour, Young Workers and Remediation Policy - we are committed to protecting the lives of Young Workers and remedying any instances of child labour. This policy sets out our approach and standards to fulfilling this commitment which includes a remediation process.

Our 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. Prior to commencement of employment, all employees will be expected to demonstrate a right to work.

Our Responsible Use of Labour Providers Policy – We will only contract labour providers which have an identifiable and legitimate business entity. We will verify with the labour provider that they meet the legal operating conditions for labour providers in that country and sector including 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 (including assessment audits) to ensure that our labour providers are compliant with this policy.

Our Whistle Blowing Procedure – We have implemented a whistleblowing procedure and a confidential helpline aimed primarily at our employees to report malpractice, unlawful or unethical behaviour within the workplace.

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.

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

Raising awareness to our employees and providing them with appropriate training remains a key focus area for Belfield. Activities this year have included

- The introduction of an E learning employee induction which specifically covers how to identify the signs of slavery and human trafficking and how to escalate suspected instances.

Translation of our E Learning employee induction to Polish and Romanian 2019 Actions

Building on the measures introduced in previous years, during 2019 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 roll out training and refresher to all relevant employees.
- Starting to deliver training on Recruitment and Equality and Diversity to all front-line managers.
- Continuing to raise awareness of the risk of Modern Slavery in communications with our employees e.g. employee newsletters, notice boards and Employee Representatives meetings.
- Supporting the National Anti-Slavery Day at our sites to raise awareness across our workforce
- Group HR attendance at the 'stronger together Investigative Interviewing Skills in the Workplace' and Tackling Modern Slavery in Businesses Workshops.

We have also successfully completed Sedex Members Ethical Trade Audits (SMETA) and Fast Forward Audits 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.

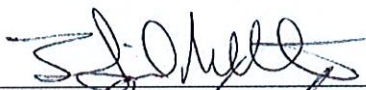
Signed:  _____ Managing Director (Belfield Furnishings Ltd)

Signed:  _____ Managing Director (Westbridge Furniture Designs Ltd)

Signed:  _____ Managing Director (Duflex Foam Ltd)

Signed:  _____ Managing Director (Tetrad Ltd)

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

Signed:  _____ Chief Finance Officer

Signed:  _____ Chief Executive Officer

Date:  _____ JANUARY 2020