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# Modern Slavery & Human Trafficking

## Statement

**Modern slavery and human trafficking exist on a vast, global scale and in many forms including forced or compulsory labour, debt bondage and servitude. Individuals are subjected to human rights abuses, deprived of their liberty, treated as commodities and exploited for commercial gain. Human trafficking is one part of modern slavery involving the enslavement of individuals for the purposes of exploitation and does not necessarily involve the crossing of borders.**

**As part of the manufacturing industry, Modus recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to acting with integrity and transparency in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the prevention of slavery and human trafficking in all our business activities and to ensure that our supply chains are free from slavery and human trafficking in accordance with the Modern Slavery Act 2015.**

**The very nature of modern slavery is that its victims are often unseen and can be extremely difficult to identify. However, Modus accepts that it has a responsibility through its due diligence process to ensure that workers associated with its business and its supply chain are not being exploited, that their working conditions are safe and that employment, health and safety and human rights laws and standards are being adhered to including freedom of movement and communications.**

**This statement sets out the steps that have been taken to ensure that there is no slavery or human trafficking in our own activities or our supply chains. This statement relates to actions and activities during October 31st 2017-2018.**

### **Business Activities & Organisational Structure**

Modus Furniture Ltd. is a UK based manufacturing company. We design and manufacture furniture for the contract market including hospitality office, leisure & public spaces.

We are a privately owned company run by a board of six Directors. We have a showroom in London and our head office and production facility is based in Somerset.

### **Supply Chain**

Our supply chain is based 82% in the UK, with 17% in Europe and 1% the rest of the world. We have many long-standing supplier relationships that we have fostered over several years.

All new suppliers are requested to complete our New Supplier Assessment to ensure that their practices and due diligence reach the standards required. Existing suppliers are subject to regular review.

### **Recruitment**

Our recruitment procedures ensure that all prospective employees are legally entitled to work in the UK. All successful applicants must produce, on their first day, one of the following: their passport, their driving licence or their birth certificate (original documents only, no photocopies).

In addition, in order to comply with the Asylum and Immigration Act 1996 requirements, if they are from a non European Economic Area (EEA) country, evidence of a right to reside and work in the UK must be produced.

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

### **Due Diligence**

We have clear systems in place to review and assess our supply chain including a supplier vetting process which requests information from potential suppliers to assess their suitability as a supplier and ensure there is no evidence of forced labour of any kind as well as covering other areas of company information, policies and procedures. This enables us to identify and assess any potential risks. As well as New Supplier Assessments, we also review existing suppliers on a regular basis and take all reasonable and practical steps to ensure our standards are being implemented through our suppliers.

### **Policies**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or any part of our business. This policy sits alongside our Equal Opportunities Policy and

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Whistleblowing Policy and our policy on Ethical Employment, Recruitment & Selection and our Ethical Trading policy. This policy applies to all individuals working for Modus or on our behalf in any capacity, including employees, directors, agency workers, agents, consultants and business partners.

### **Responsibility**

The board of directors has overall responsibility for ensuring that this policy complies with our legal and ethical obligations.

The Compliance Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in our business or supply chains.

Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

### **Compliance & Employee Code of Conduct**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company.

Modus makes clear to employees the actions and behaviour expected of them when representing our company. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and overseas.

If a breach of, or conflict with this policy is suspected staff must notify their line manager or team leader or report it in accordance with our whistleblowing policy. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains as soon as possible.

### **Breach of Policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Modus may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

### **Whistleblowing Policy**

We encourage all our staff, customers and other business partners to report any concerns related to our direct activities, or our supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation and we will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our business or in our supply chain.

### **Training and Awareness**

New staff are briefed on our policy to prevent modern slavery and human trafficking as part of our induction process. Existing staff receive briefings on the principles and content of our policy as well as information on how to spot the signs of modern slavery and what to do should they suspect it.

Our zero tolerance approach to modern slavery is communicated to all suppliers, and other business partners when entering into new or renewed contracts with them.

### **Approval & Review**

This statement has been approved by the organisation's board of directors, who will review and update it annually.

**Signed:**



**Date:**

**1st May 2018**

**Jon Powell**  
**Managing Director**  
(on behalf of the board of directors)