



# STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

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## **1. Airsprung Group Structure**

Airsprung Group plc is the parent company to seven subsidiary companies operating in four distinct areas of the furniture industry: Bed Manufacture, Sofa Manufacture, Sofabed manufacture and Headboard Manufacture. The Group also has a small Graphic Design business subsidiary. The Group has manufacturing units in Wiltshire, Avon & Somerset, Lancashire, and County Durham.

## **2. Our Values**

Airsprung Group is committed to adopting the highest standards in the honest, fair and transparent employment of its directly employed staff and to us all reasonable endeavours to ensure its supply chains commit likewise.

## **3. Airsprung Group and ethical trading**

Airsprung Group (the Company) fully understands its responsibility to operate in an ethical trading manner across all business.

This statement has been published in accordance with Section 54 of the Modern Slavery Act (2015) (the Act) and it sets out our continued efforts throughout 2020/21 to understand the risks of modern slavery within our operational environments, labour suppliers and supply chains.

This is published for the year 1 April 2020 to 31 March 2021 and confirms our continued commitment to reinforcing the eradication of human slavery and servitude, forced or compulsory labour and human trafficking throughout our supply chains.

We also work to stamp out modern slavery and take the appropriate steps to ensure that everybody who works for Airsprung Group benefits from a working environment in which their fundamental human rights are respected, and that anyone that we do business with also upholds these principles. The Company is pleased to report that there have been no reported instances of slavery activity or human trafficking found within any of its subsidiaries.

Airsprung Group can further report that it is not aware of any modern slavery or human trafficking claims made against any of its suppliers. The Company will not knowingly work with any organisation that either has, or is found to knowingly be involved with either human trafficking or modern slavery.

## **4. Responsibility for anti-slavery initiatives**

The Group Chief Executive and the Group Human Resources Director have full responsibility for ensuring that all policies are adhered too, and the Group Human Resources Director has full responsibility for ensuring that this is communicated to all employees.

The anti-slavery initiatives within the supply chain are the responsibility of the director with overall control for the respective trading units.

#### **5. Tackling Modern Slavery – our employees**

To ensure that we recruit and treat our employees fairly, and ensuring that we avoid modern slavery in any way, our Policies for People set out our procedures on how the company:

- a) Recruits and selects employees in a fair, professional, and lawful manner, for both internal and external applicants.
- b) Treats all employees across the Group fairly during their employment, and if there is an occasion when an employee feels that they are not being treated fairly there are several procedures in place. They can report anonymously through the whistleblowing hotline, raise an informal grievance, a formal grievance, or approach our recognised trade union.
- c) We ensure that we manage the exiting process for employees, if necessary, in a legal, fair, and transparent way.

#### **6. Tackling Modern Slavery - supply chain**

Each of the Group subsidiaries operate with independent Procurement/Supply Teams. By means of internal audits (smaller Suppliers) and external audits (larger Suppliers), the Supply Teams will endeavour to ensure that the entire Supply Base meets the required ETI base code standards to include an acceptable policy on Modern Slavery and Human Trafficking.

#### **7. Company Risks**

At the time of writing this statement only two of the seven Group companies belonging to Airsprung Group are using agency labour. This is due to company restructures as a consequence of Covid. This has therefore reduced the risk to the company for the last 12 months. However, it is aware that times change and that it may use agency labour again within this financial year. For that reason the previous initial behaviours will follow i.e. strict company audits for agencies, and questionnaires for new entrants to the company, along with the vigilance of management in looking for signs of modern slavery within its workforce.

In respect of the supply chain, the company has identified risks as possible non-compliance of 3<sup>rd</sup> party suppliers.

#### **8. Our policies in relation to Modern Slavery**

The following company policies support us in ensuring that modern slavery is not taking place within our supply chains or business:

To confirm the company's full commitment to eradicating modern slavery and human trafficking it also has the following policies which are fully available to all employees:

- Ethical Trading Policy
- Anti-Bribery Policy
- Whistleblowing Policy
- Harassment and Bullying Policy
- Work Related Abuse and Violence Policy
- Equal Opportunities Policy
- Child Remediation Policy



## **9. Due Diligence processes**

### Airsprung Group Audits by Third party auditors

All relevant Group companies have consistently passed all ethical audits with SMETA, passing for our high ethical standards and commitment to ensuring that our employees, whether agency or contract, are treated properly. Results are published and are available online.

### Recruitment

All of our new employees are subject to pre-employment checks to confirm their identity and right to work in the UK. Where recruitment agencies are used, we ensure that they comply with all legal requirements, as a minimum.

### Worker to Employee interviews

To further protect workers when moving onto contract status with the company, the worker will complete a Stronger2gether questionnaire to ensure that they are not in bonded labour or have been part of human trafficking. They are given the option to complete the questionnaire anonymously if they wish, and return to the Group HR department in a sealed envelope.

### Supply Chain

As well as reviewing those existing unaudited Suppliers, the Group vows to undertake due diligence when taking on new suppliers and, thereafter, our procurement teams commit to undertake regular reviews against set criteria. During the next 12-18 months our intention is to review our current selection, assessment and monitoring processes to ensure modern slavery and human trafficking is at the forefront of due diligence assessments within our supply chain

## **10. 2020/21**

Further to the last Statement the company has:

- Set up a dedicated confidential whistleblowing hotline by email to report anonymously to the Group HR Director.
- Ensured that each new employee gets a Stronger2gether questionnaire to complete, as referenced above.
- Started to appoint one person in each Group company to take responsibility for ethical audits on suppliers.
- Continued to carry out Self Audits and 3<sup>rd</sup> party audits where applicable within our Supply Chain
- Reviewed any process if necessary, after each SMETA audit.
- Introduced a Child Remediation Policy.
- Ensured that all members of the centralised HR function have attended a Stronger Together seminar
- Pre-lockdown, ensured that some members of the Supply Chain Team had attended a Stronger Together Seminar.

In addition, the company will over the next 12 months continue to embed the principles through:

- Updating the Staff Handbook and issuing to all new and existing employees which includes an emphasis on Modern Slavery, with a number to call if concerned about slavery issues.

- Ensuring that all relevant staff within production management of all subsidiaries, and supply chain departments, has attended a Stronger2gether training course.
- Ensuring that our objective remain that all of our Suppliers across the Group will eventually be independently audited or suitably assessed.
- Improving its communication in carrying out training for all key staff, shop floor management, and all directors, to ensure that they are aware of the risks and signs of human trafficking within the workplace.
- Carrying out Dignity at Work Training across all Group companies.
- Issuing all Recruitment Agencies used a copy of the Child Remediation Policy.
- Continuing to improve its ethical audits on suppliers used within the supply chain.
- Issuing all Suppliers a copy of the Child Remediation Policy issued.
- Developing a Supplier Code of Conduct which involves their commitment to eradicating human trafficking or modern slavery.
- Appointing a Representative for Modern Slavery in our Supply Chain in due course.
- Ensuring that members of the Supply Chain Team attend a Stronger Together Seminar, as previously planned before lockdown.

#### **11. Effectiveness assessment**

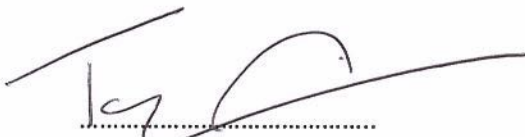
To assess the impact of the steps that we have taken, key performance indicators will be reviewed and reported on further in our Modern Slavery Statements:

This will be by:

- Assessment of the reporting of abuse directly to the company.
- Ensuring that all relevant staff attend the Stronger2gether workshops.
- If an issue is suspected or identified, the Group HR department will be monitored by the CEO during normal reporting procedures from the Group HR Director to the Group CEO.
- Assessment of the number of issues raised through any of the Company policies.
- Regularly reviewing the progress in our Supply Chain, with the appointed Representative.

#### **Board approval**

This statement is made pursuant to section 54 (1) of the Act, has been approved by the Group Chief Executive of Airsprung Group plc and will be updated annually in line with the Act's reporting requirement.



Tony Lisanti  
**Group Chief Executive**

Date: 27 APRIL 2021.