



## **MODERN SLAVERY ACT**

### **DOWNLAND BEDDING COMPANY LIMITED STATEMENT**

Downland Bedding Company is committed to making meaningful and long-lasting improvements to workers employment and workplace conditions including, but not limited to, the prevention of forced, bonded and trafficked labour. This is upheld through the company's policies and governance and is supported by a committed organisation and leadership.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps DBC are taking to eradicate and ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. It constitutes our slavery and trafficking statement for year ending 2020.

#### **Structure and Supply Chain**

DBC has a structure and supply chain network that exists to support the manufacture and supply of our products as well as the network of operations relating to its day to day business operations.

#### **Raw Materials**

In addition to the supply chain for finished goods, DBC is also aware of the importance of its raw material supply chain and the sustainability of raw material suppliers.

#### **Respect of Human Rights**

DBC believes that respect for human rights is integral to being a responsible company. The prevention of forced, bonded and trafficked labour are key elements in the DBC Ethical Trading Policy and the Ethical Trading initiative Base code.

#### **Due Diligence- Risk Assessment- Measuring effectiveness- Promoting Human Rights across the business**

DBC has been a member of Sedex (Social Ethical Data Exchange) since 2013 and our site has been ethically audited by an independent 3<sup>rd</sup> Party to the 2 pillar Smeta Standard which covers ETI Base Code (Ethical Trading Initiative), Management Systems, Employment is freely chosen, Freedom of Association, Health & Safety, Child labour, wages & benefits, working hours and discrimination, Audits can be Semi announced or Unannounced. Only specifically trained and evaluated auditors are allowed to perform our audits.

For suppliers in other countries, we have had a program of the Smeta Ethical 2 pillar (plus extra customer requirements where required) since 2015. This is being expanded continuously. DBC also welcomes and submits to our specific customer's ethical audits, grading and requirements on our and our supplier sites.

From the above due diligence audits DBC can risk assess our own companies and suppliers within our supply chain on the Sedex database. DBC from these audits can measure the effectiveness of these actions.

## Responsible Sourcing

DBC is committed to responsible and sustainable business principles throughout the supply chain including the sourcing of raw materials. This includes materials whose cultivation or production presents a specific sustainability risk. DBC specifically prohibits sourcing in regions where the risk of modern slavery and other labour issues are recognised,

## Downland Bedding Company Non-Compliance Policy

Where breaches of our standards and policies are identified DBC will collaborate to find solutions to address the non-compliance. Where improvements are not made within the given time or there is an unwillingness to address the situation DBC will terminate the business relationship. However, a reasonable amount of time is given to rectify non-compliance to minimise any potential and / or detrimental impact on workers lives.

## Downland Bedding Company Compliance Policy

Compliance with the DBC Ethical Trading Principles is a requirement of doing business with DBC. DBC works with its suppliers to support their compliance, and may take action against those that do not demonstrate sufficient commitment to the principles, or are in breach of them. In the event of a supplier being found to be involved in modern slavery DBC will take action to help safeguard the workers wellbeing.

## Moving Forward Together

DBC will continue to develop employee and supplier training and target areas of the business where there is potential risk of labour rights abuses including incidences of Modern Slavery. DBC believes that training for employees and its supply chain, with an increased emphasis on transparency throughout the supply chain may help identify modern slavery risks.

*Fraser Smith*

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Fraser Smith  
Managing Director

Version	Amendment	Date
1	na	17-06-2020
2	New brand logo. Removed the text "approved by the board on 17 <sup>th</sup> ....."	18-05-2023