

JULIAN BOWEN

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Modern Slavery and Human Trafficking Statement 2023

About this statement

This statement is made by the Directors of Julian Bowen pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (“the Act”). The Act requires commercial organizations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual Slavery and human trafficking statement. The statement covers the activities and actions undertaken by Julian Bowen to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business.

The Company, its structure and supply chains

Julian Bowen is widely recognised as a leading furniture solutions supplier to the UK’s major retailers, providing a fully integrated service covering all aspects of the supply chain. Since its establishment in 1987, Julian Bowen has gone from strength to strength, underpinned by an exceptional new product development track record, consistent new customer wins and growing e-commerce capabilities. Following extensive investment, online retailers now comprise 70 per cent of sales, while the company offers a flexible fulfilment model to suit its wide range of customers that includes e-commerce, traditional bricks and mortar retailers and contract furniture providers.

Our supply chain currently involves more than 40 suppliers, some of them operating in developing countries where the risk of modern slavery is significant.

Introduction

Modern slavery is a heinous crime that grossly violates fundamental human rights and its occurrence can take several different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

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Julian Bowen recognises that it is a real problem for millions of people around the world who are being kept and exploited in various forms of slavery and, thus, every company is at risk of being involved in this crime through its own operations and its supply chains. In addition, Julian Bowen recognises that a sector in which there is a particular vulnerability to modern slavery is the furniture sector and its close connection with developing countries, where the risk of modern slavery is considerably higher.

To this end, we have duly assessed our business for the risk of modern slavery and concluded that the two main areas where modern slavery could occur are within our own workforce and in the workforce of our supply chain. However, we consider that we have adopted a plethora of robust employment practices for recruitment and management of our own staff and accordingly, we believe that the risk of modern slavery is more likely to occur within our supply chain than within our own workforce.

Key Policies

In Julian Bowen we have a zero-tolerance approach towards modern slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or our supply chain. This unconditional stance is made clear in all our relevant policies and behaviours. Through our policies we communicate our values and expectations, setting a high bar for ourselves and our suppliers and making clear that we do not tolerate any form and any instance of modern slavery. Realizing that this is an ever-evolving issue of cardinal importance, we are committed to consistently improving our approach. To this end, we regularly review our policies to identify areas that need adjustment and improvement.

Our key policies and procedures, which outline the steps that we have taken to mitigate against the risks of modern slavery, are set out below. These are reviewed on a regular basis considering the evolving conditions, practices and legal requirements.

Our key procedures to address modern slavery risk include:

- A 'Modern Slavery Policy' for our people, which sets out the key issues and how we should respond including a process for raising concerns internally.
- Employment policies that protect our people from unfair treatment and promote a just, fair and inclusive workplace.
- Robust recruitment processes in line with relevant employment laws. To this end, we have adopted a market-related approach towards our employees' remuneration which is reviewed annually.

- Wellbeing strategy and initiatives to support our people’s physical and mental wellbeing and lifestyle choice.
- A ‘Supplier Code of Conduct’ making clear to our suppliers from the outset the high standards we expect from them.
- Representation teams in our suppliers’ countries assigned to conduct regular on-site factory visits, (either announced or unannounced) to ensure that everything is compliant with the provisions of the Act.

Due Diligence

We have incorporated appropriate measures into our sourcing, supplier on-boarding and contract management processes, therefore minimising our exposure to risk. Using supply chain due diligence principles enables us to make a judgement on transactions and the integrity of our supply chain.

Our aim is to build solid relationships with our suppliers to ensure they comply with our ethical values and that they are aware of our unconditional commitment to protecting human rights and our zero-tolerance attitude towards modern slavery. Therefore, we require all our suppliers to fully adhere to the requirements of the Modern Slavery Act. Hence, we have developed a more detailed and robust set of modern slavery clauses to include in all supplier contracts. The updated clauses will be included in all new contracts and will also be considered for inclusion, where possible, in existing contracts on renewal. To this end, our modern slavery clauses stipulate that all our suppliers have to undertake SMETA audits and these are handed to our company in order to ensure that there are no violations of the Modern Slavery Act, and any risks highlighted therein, regardless being minor or major, are dealt and solved immediately. Moreover, suppliers must notify us of any previous or current investigations or convictions related to modern slavery and will notify us immediately if any suspected issues or breaches arise and they are required to cooperate extensively with any audits we undertake. In addition, suppliers are required to implement appropriate due diligence procedures to tackle and mitigate the risk of slavery or human trafficking in their supply chain.

Employee Awareness and Training

We recognise the need for training, and we have actively provided all our personnel with up-to-date training on the Modern Slavery Act provisions in order to gain awareness of the purpose and scope of the Act and their accompanying rights and duties deriving thereof.

Whistleblowing

In Julian Bowen we treat any instances of malpractice or impropriety very seriously. It is very important that everyone is encouraged and feels supported in speaking up about their concerns and we aim to provide a culture where everyone feels confident to do so. Therefore, we have in place whistleblowing policies for employees to disclose malpractice or impropriety. These procedures provide a means of dealing with issues of malpractice or impropriety such as:

- criminal activity, for instance fraud, corruption, bribery or blackmail
- abuse of office or position
- failure to comply with any legal duty.
- endangering the health and safety of an individual or groups of individuals, including risks to the public
- environmental damage
- any deliberate attempt by any person to conceal any of the above.

Review

We will review and update this statement on an annual basis. This statement will next be reviewed from February 2024 and published in March 2024.

Approval

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and is approved by the Directors of Julian Bowen. This statement will be made available on our website.