

## Floorwise Modern Slavery Statement 2022/23

Floorwise are committed to operating in a way which significantly reduces the risk of Modern Slavery, which includes the following activities, from our supply chains:

**Human Trafficking** is where a person arranges or facilitates the travel of another person with a view to that person being exploited even if the victim consents to the travel and exploitation has not yet taken place.

**Forced Labour** or bonded labour involving coercion, with either direct threats of violence or more subtle forms of compulsion, which force a person to undertake work to for which they have not offered themself voluntarily.

**Child Labour** is defined as children below 12 years working in any economic activities or those aged 12-14 engaged in more than light work. Although some forms of light work are deemed acceptable, we take the view that it must not deprive them of their childhood.

Modern Slavery in all its forms is a global concern without borders and has long been classified as a crime under both UK and international law. Despite this it continues to exist in countries throughout the world. This policy statement defines our commitment to ensuring both that Modern Slavery does not exist within our business as well as working to eradicate them from other businesses who come within our product and service supply chains.

#### Our organisational structure and supply chains

Floorwise are a purchasing organisation wholly owned by our members who sell Floorwise branded products. The manufacture of these products is sourced by us to be sold alongside those from other *manufacturers* with whom we negotiate ongoing supply agreements.

These supply chains can be global in their scope so we work closely with all of our suppliers to be confident that the risk from Modern Slavery in all of its forms can be reduced.

### Policies in relation to slavery and human trafficking

Floorwise will not knowingly engage with any business that incorporates, or that we believe may incorporate, any of the facets of Modern Slavery within its business model.

We will continually work with our suppliers to ensure that as a minimum requirement they meet or are working towards the seven elements of the Ethical Trading Initiative Base Code:

- Employment is freely chosen.
- There is freedom of association.
- Working conditions are safe and hygenic.
- Child labour shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practiced.

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#### Due diligence processes

Where possible we will visit with our suppliers on a regular basis and look for ourselves if there are any visible signs of Modern Slavery in place.

If there are any instances where we feel that there is an increased risk of breaching the ETI Base Code it is raised both with the Managing Director of Floorwise as well as the wider management team and with the owners of the business where the risk has been identified.

We have identified our main area of potential risk as outside the UK and have now employed a local agent who regularly visits our suppliers and will report back any issues or concerns.

## Risk assessment and management

Within Floorwise we have appointed our Managing Director as our compliance officer. They regularly report to the board directors, as well as to the wider group membership, as to the procedures we have in place and where any risks or breaches have been identified - along with whatever corrective actions need to be taken to resolve them.

As covid restrictions ease we seek to get out and meet our suppliers at their factories on a regular basis to see for ourselves what conditions are like and to talk to the workers through our local agent who accompanies us on these visits.

We also look to establish long-term relationships with our suppliers to maximise our confidence in their commitment to operating without Modern Slavery in their business.

Fortunately, in many cases, the work is relatively skilled and well paid (in local terms) so the risk of Modern Slavery is reduced commensurately and being predominantly factory based the worker records are easier to view.

## Key performance indicators to measure effectiveness of steps being taken

Our key performance indicator is set around the number of breaches – actual and potential – that occur within our supply chains. With our key suppliers we look to ensure that they are aware of, and are operating to, the ETI Base Code.

Where we are looking at new suppliers, we will always seek to incorporate a commitment to adopting the ETI Base Code – if it is not already in place - alongside a site visit from a member of our management team before we enter into any contractual supply agreement.

# Training on modern slavery and trafficking

Floorwise recognise that within our supply chains there is an ever-present risk of Modern Slavery especially in the lower skill / lower pay areas of activity and will provide staff training on measures to identify and reduce this risk as necessary.

We will also continue to work with all of our suppliers to ensure that this risk is minimised on an ongoing basis with a view to helping eradicate it from all of our supply chains.

Issued and approved on the 30<sup>th</sup> June 2023 Richard Bailey **Managing Director** 

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