

## **MADE.COM Modern Slavery Act Statement 2019**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It details the steps that Made.com Design Ltd (“MADE”) has taken - and is continuing to take - to ensure that modern slavery and human trafficking is not taking place within our business or supply chain.

MADE has a zero-tolerance approach to any form of modern slavery, which we consider to include different types of exploitation such as forced labour, servitude, child labour and human trafficking. We are committed to acting in an ethical manner with integrity and transparency in all of our business dealings. We are also committed to establishing effective systems and controls in order to safeguard against any form of modern slavery taking place within our business or our supply chains.

### **Our Organisation**

MADE is a design brand with a vision to make great design accessible to everyone. We collaborate with talented designers and work closely with suppliers across the world to offer consumers unique furniture, homeware and lifestyle products at affordable prices. MADE is incorporated in England and Wales with company number 07101408 and is a wholly owned subsidiary of Made.com Limited, a company incorporated in Gibraltar under company number 113041. MADE has employees based in the United Kingdom, certain European countries, China and Vietnam.

We believe that our biggest exposure to modern slavery lies in our product supply chains in China, Vietnam, India, Malaysia, Indonesia and certain countries in Eastern Europe. As such, our activities relating to assessing and managing our modern slavery risks focus on our key suppliers in these geographic regions.

### **Our Policies**

We operate a number of internal policies to ensure that we minimise the risk of harm associated with modern slavery and human trafficking, as well as with related matters such as unsatisfactory working conditions and discrimination. These policies are also designed, more generally, to ensure that we are conducting business in an ethical and transparent manner. These policies include:

- **Recruitment policy.** We conduct eligibility-to-work checks for all employees globally to safeguard against human trafficking or individuals being forced to work against their will.
- **Employee policies.** Our employee handbook includes policies on diversity, health and safety, grievance procedures and whistleblowing. The whistleblowing policy in particular ensures that all employees know that they can raise concerns without fear of reprisals.

### **Our Suppliers**

As part of our initiative to identify, assess and mitigate risk, we conduct due diligence checks and inspections on our suppliers, both before we start working with them and on an ongoing basis. Our due diligence activities include the following:

- **Supplier code of conduct.** We require all our suppliers to make a number of contractual commitments to us as part of the supplier terms and conditions that they sign. Under these terms and conditions, suppliers must adhere to all applicable laws regulating child working and bonded labour; must not under any circumstances or on any basis, engage any person under the age of 15; and must maintain appropriate workplace health, safety and welfare conditions. Any breach of these commitments is one of the grounds under which we can terminate the relationship with the supplier.

Our suppliers also agree to assist and cooperate with us on any due diligence checks, audits, and inspections that we may undertake to verify their compliance with these commitments. Further details of these checks, audits and inspections are provided below.

- **Visits and inspections:** Our buying and quality teams, who are based in the UK, China and Vietnam, carry out periodic visits to, and inspections of, most of our suppliers. They also work with factories to resolve any issues that are identified through such visits and inspections, such as through improvements to factory processes, within a reasonable timeframe. On occasion, visits and inspections may be unannounced, particularly if there is a history of non-compliance.

We recruited a Quality Manager in Vietnam in 2018 whose role includes ensuring that our suppliers are implementing the aforementioned company policies and to manage visits and inspections. Recruiting a Quality Manager has made our Vietnamese quality operations more standardised, without the need to outsource this function to third parties and enabling us to respond to issues more efficiently and gain a direct understanding of the risks to our business.

During the 2019 financial year we have continued to work with the specialist social auditing organisation Bureau Veritas to assess and evaluate the personnel practices and working conditions of all of the new factories that we engage. We also request evidence of good practices from factories with whom we have an existing relationship, such as internal assessments and SMETA audits (Sedex Members Ethical Trade audits, one of the most widely used ethical audit formats in the world). Our internal Quality team reviews this evidence, as well as all audit reports submitted by third parties we engage ourselves, and works with our suppliers to agree and implement appropriate actions to correct any issues identified. During the 2019 financial year we have been considering ways of expanding the factory evaluation process we can conduct in-house.

## **Our Strategy**

During the 2019 financial year, we built on our Corporate Social Responsibility strategy and have taken steps to recruit and create our own internal Sustainability team which initially consists of a Sustainability Manager and Sustainability Assistant. The creation of this new Sustainability team will allow us to create a Corporate Social Responsibility strategy specific to MADE, focussing on risks relevant to our business and our suppliers, and means there will be a team within the business whose remit directly includes modern slavery.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff and suppliers, with emphasis placed on those who have direct contact with, and responsibility for, our operations in China, Vietnam and India.

We also engage an experienced third party to train our UK and Chinese buying and quality teams on UK and EU compliance matters.

## **Review and Further Steps**

We recognise that our commitment to a zero-tolerance approach to modern slavery is a continual journey which requires us to review and where necessary, modify our processes, on a regular basis. As such, we have reviewed the effectiveness of the steps we have taken throughout the previous financial year to ensure that there is no slavery or human trafficking taking place in any part of our business or supply chains. Following this review, we intend to take the following further steps to ensure that we continue to combat slavery and human trafficking:

- **Training.** We are committed to improving our approach to training, and as such, we will continue to review our current training process in order to ensure that it remains comprehensive and effective.
- **Internal focus.** The creation of our Sustainability team will allow for the development of a bespoke Corporate Social Responsibility strategy for MADE and a focus on how we can continue to tackle the problem of modern slavery from within the business, and with less reliance on third parties.

Our 2018 statement is available [here](#).

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This statement was approved by the Board of Directors of each of MADE and MADE's parent company, Made.com Limited, on 2 July 2020.

Signed by:

A handwritten signature in black ink, appearing to read 'Philippe Chainieux', with a long horizontal flourish extending to the right.

Philippe Chainieux  
Director, Made.com Design Ltd and Made.com Limited