

Modern Slavery Statement 2016

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 for the financial year ending 31st December 2016.

Introduction

Orangebox adopts a zero tolerance approach to modern slavery. Modern slavery can occur in the forms of servitude, forced or compulsory labour and human trafficking for the purpose of personal or commercial gain.

We are committed to acting ethically and with integrity in all of our business activities and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those within our supply chain.

This statement sets out actions taken by Orangebox to understand and address all potential areas of risk of modern slavery, and put in place steps that are aimed at ensuring that there is no slavery or human trafficking throughout its own business and supply chains. This statement relates to actions and activities during the financial year 1st January 2016 to 31st December 2016.

Our Business and Organisation Structure

We are a design and manufacturing business of innovative furniture solutions for the modern workplace. The business is privately owned and run by a board of 8 Directors and reached a turnover of £55m for 2016.

Our head office and main manufacturing site is based in South Wales, UK and we have recently launched our sister company Orangebox USA Inc based in Michigan, USA. In addition to this we have design and showroom sites in Huddersfield, London and the UAE.

Our Supply Chains

Our supply chain of materials is sourced globally, being 70% from within the UK, 25% from the rest of Europe and 5% from China.

Our relationship with our suppliers has been long established over a number of years. We endeavour to only work with highly reputable suppliers, and they are appointed upon satisfactory completion of a Supplier Assessment Process which is available on our Supplier Extranet site. This is to ensure that all due diligence and ethical practices are in line with our own Ethical Purchasing Policy, also available on the Supplier Extranet.

Our supply of temporary agency workers are sourced from one main local recruitment consultancy who has also undergone a rigorous assessment process into their own due diligence and ethical practices.



2016 Turnover £55 m



411 Employees

Responsibility

The responsibility of business initiatives relating to the prevention of modern slavery are as follows:

- Research and development of relevant employment policies are the responsibility of the HR Department
- Implementation and enforcement of these policies are the responsibility of the Management team and Directors of the business
- Research and development of the Ethical Purchasing Policy and Supplier Assessment methodology is the responsibility of the Material Control Department
- Implementation and enforcement of this policy is the responsibility of the Material Control & Planning Manager and Operations Director

Relevant Policies

We have a number of policies in place currently which support the zero tolerance approach to slavery and human trafficking offences within our own business and that of our supply chains. These policies are communicated throughout the business to all members of staff to raise awareness and provide information on the correct procedures for reporting any suspected areas of concern. The policies currently in place are:

- Equal Opportunities Policy
- Recruitment & Selection Policy
- Whistle Blowing Policy
- Grievance Policy & Procedure
- Ethical Purchasing Policy

Recognised Areas of Risk

The following activities or areas of business are considered to be potentially at a higher risk of modern slavery or human trafficking:

- Hiring of agency workers via external recruitment suppliers
- Wider supply chain such as 2nd and 3rd tier suppliers

Due Diligence Processes

In relation to the recruitment of employees, we:

- Conduct appropriate proof of eligibility to work checks in line with legislation on all new employees to the business
- Provide all new employees with clear, legally compliant employment contracts
- Ensure all payroll processes and deductions from wages adhere to legislation
- Ensure all employees are paid fairly and we adhere to NMW legislation
- Ensure policies are kept up to date to support fairness and equality and that there are clear routes to report any grievances or issues relating to poor treatment of employees or agency workers. These are detailed further in our Equal Opportunities Policy, Whistle Blowing Policy and Grievance Procedure.
- Ensure that all external staffing suppliers adhere to equivalent policies and procedures

In relation to the hire of agency workers we

- Build and maintain close working relationships with our external staffing suppliers to ensure our policies and procedures are communicated correctly
- Will be conducting audits (quarterly) of processes undertaken by all recruitment agency suppliers of temporary workers to ensure the following:
 - ✓ There is no evidence of forced labour, slavery or human trafficking in their processes
 - ✓ The appropriate checks for proof of eligibility to work are conducted
 - ✓ No Identity documents are withheld
 - ✓ Workers are not charged any illegal recruitment fees
 - ✓ Workers are provided with clear, legally compliant contracts (where applicable)
 - ✓ No illegal deductions from wages are made
 - ✓ Workers are paid correctly and in line with NMW legislation

In relation to the sourcing and appointment of new suppliers, we:

- Conduct a rigorous supplier assessment process
- Issue our Ethical Purchasing Policy to all new and existing suppliers

Effectiveness in measuring activities

We currently conduct:

- New starter audits of personnel files on all new employees to our own business

We aim to improve the measures of effectiveness in future through:

- Changes to the new supplier assessment process to incorporate a clearer investigation into signs of modern slavery within employment practices
- Carry out quarterly audits on our agency worker suppliers
- Seek certification from our suppliers on compliance with our policy
- Implementing SMETA 2 pillar audits from 2017

Training & Awareness

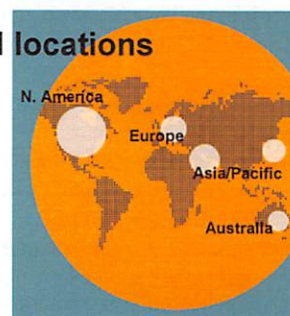
- We aim to promote awareness among all staff within the business through the communication of the Anti-Slavery & Human Trafficking Policy
- We aim to provide further relevant training to all staff involved in managing the supply chain relationships on the correct use of processes and audits to follow and how to recognise signs of modern slavery

Reporting Modern Slavery or Human Trafficking Concerns

If any employees of our business have reason to suspect activities related to modern slavery or human trafficking within our business or supply chain they must contact their relevant Departmental Manager to report this immediately.

We operate a Whistle Blowing Policy which should be consulted in the reporting of concerns of this nature.

Our global locations



Orangebox recognises that ongoing development of its current initiatives will improve its approach to the prevention and handling of modern slavery within its business and wider supply chain.

This statement was approved by the Board of Directors of Orangebox.

Signed: JAD

Title: OPERATIONS DIRECTOR