

Company Statement - Prevention of Modern Slavery and Human Trafficking

Breasley Pillows Ltd. (Trading as Breasley Foam)

Introduction

This statement sets out the steps Breasley Pillows Ltd plan to take to ensure modern slavery and human trafficking is not taking place in our business and supply chain, in line with Section 54 of the Modern Slavery Act 2015.

This statement relates to actions and activities during the current financial year.

Company, structure and supply chains

Breasley is a privately owned, market leading manufacturer of foam and bedding products, supplying a wide range of products to leading furniture and bedding retailers in the UK and Europe.

Our products are supported by expert innovation and design to provide our customers with industry leading products designed for ultimate comfort, quality and safety.

All our production operations are in the UK, across two sites in the Derbyshire region. Ilkeston is home to the production of our bedding products and Wirksworth is responsible for foam conversion. These sites are supported by field sales and marketing teams and on-site office support, totalling c. 240 employees. Breasley's workforce is supported by approximately 20% agency employees. We are committed to working closely with our temporary labour suppliers to ensure our agency employees are not at any increased risk of modern slavery and human trafficking.

In line with our Ethical Trading Policy, we commit to working closely with all suppliers both in the UK and overseas to ensure we source commercially priced materials, whilst recognising the increased risk to modern slavery within these global supply networks.

We are proud to have long standing relationships with our UK / European and Global based suppliers, allowing us to have a confidence in the products and materials we source through our supply chain, to support us in delivering consistent service and quality products to our customers.

Breasley is committed to working towards transparency within its supply chain, to ensure that the risks of modern slavery and human trafficking are mitigated within our business.

Policies on Slavery and Human Trafficking

We have the following policies that operate in our business. These policies reflect our commitment to act ethically and with integrity, by implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chain.

- *Policy - Prevention of Modern Slavery and Human Trafficking*

We are currently in the process of issuing all employees, contractors and business associates who work on behalf of the business with a copy of the Prevention of Modern Slavery and Human Trafficking Policy. This Policy sets out our approach to modern slavery and human trafficking which outlines that no slavery of any kind will be tolerated and that we are committed to mitigating all slavery risks within our business and supply chain.

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It sets out clear standards and expectations to our employees, contractors and business associates and provide guidance on how to report suspicions or concerns relating to compliance with this Policy.

- Whistleblowing Policy

We are in the process of issuing all employees, contractors and business associates who work on behalf of the business with a copy of the Whistleblowing Policy.

This Policy outlines how anyone (including customers and suppliers) can report, to the Company, concerns that are directly related to business activities or within its supply chain. The Whistleblowing procedure is designed to allow individuals to make disclosures, including any that relate to slavery or human trafficking, without the fear of retaliation.

- Conduct and Standards Policy

The Company Conduct and Standards Policy outlines the behaviours and standards of conduct that are expected of employees, at all times.

- Ethical Trading Policy

Our Ethical Trading Policy outlines the businesses commitment towards ethical, sustainable and socially responsible trading to its suppliers, service providers and customers.

This policy supports the prevention of modern slavery and human trafficking in terms of its Ethical Trading Code of Practice, including a zero-tolerance approach to human exploitation, forced, bonded or involuntary labour or sub-contracting as a means of avoiding employment legislation.

Due Diligence

Company policies and procedures are regularly reviewed and amended to ensure that they continue to be legislatively compliant.

- Policy Responsibility

The Company Directors have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. The Company Management Team are responsible for compliance in their respective departments and for their supplier relationships.

- Permanent and Agency Recruitment

Breasley is absolutely committed to ensuring that all potential employees have the legal right to work in the UK under employment legislation.

The business will aim to only source and employ labour from recruitment agencies that are reputable, who abide by employment legislation requirements and demonstrate their commitment towards the prevention of Modern Slavery and Human Trafficking Act (2015).

- Supplier location risk assessments

Over the next 6 months, the business plans to undertake a full first tier supplier risk assessment based on where suppliers are based across the globe.

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We expect this assessment to provide an indication of the potential risk of slavery and human trafficking. The results of this assessment will allow the business to determine the level of scrutiny required by Breasley, to ensure that no slavery or human trafficking is taking place.

- Supplier due diligence

Over the next 6 months, first tier suppliers will be required to declare that they are complying with the provisions of the Modern Slavery and Human Trafficking Act (2015).

Due to practical reasons it is not possible for us to have a direct relationship with all links in our supply chain. Therefore, our supplier declaration will require our first suppliers to confirm they are acting in accordance with their own modern slavery and human trafficking due diligence.

We aim to make and maintain relationships with suppliers who understand our behaviour and conduct expectations in the prevention of modern slavery and human trafficking.

- Supplier Service Level Agreements

Over the next 6 months, all existing suppliers will be issued with revised terms and conditions incorporating the Modern Slavery Act (2015) provisions. All new suppliers will automatically be issued with the revised terms and conditions. This is part of Breasley's commitment to ensure its own suppliers are acting ethically and with integrity with regards to the prevention of modern slavery and human trafficking.

In incidences where suppliers are unable to demonstrate conduct standards in line with the provisions, we commit to working with them to comply, within reasonable timescales. In the eventuality that a supplier cannot comply, the business will terminate the trading relationship.

- Performance Indicators

Over the next 6 months Breasley will aim to develop effective measures to ensure compliance with this Statement and our Prevention of Modern Slavery and Human Trafficking Policy. Measures may include;

- Monitoring the use of the Whistleblowing Policy in relation to modern slavery and human trafficking disclosures.
- Regular reviews of our recruitment practices, to ensure continued legal compliance.
- Issuing all new and existing employees, contractors and business associates with all relevant policies relating to the prevention of modern slavery and human trafficking and receive the necessary training.
- Conducting supplier risk assessments to identify the severity of modern slavery and human trafficking risk (low, medium, high) and taking necessary action to identify and close gaps where required.

- Employee Awareness and Training

The business recognises the need to create awareness and provide relevant training across the workforce with regards to the identification, prevention and reporting of modern slavery and human trafficking.

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Over the next 6 months all employees, contractors and business associates working on behalf of the Company will be issued with a copy of the Prevention of Modern Slavery and Human Trafficking Policy. As necessary, employees will also undertake learning modules to gain awareness and understand their responsibilities with regards to the Modern Slavery Act (2015).

Mike Crowshaw

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Breasley Pillows Ltd

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