

**MADE**⁺

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MADE Modern Slavery Act Statement 2017

This statement is made pursuant to s.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 an online 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 and homeware products at affordable prices. MADE is registered in England and Wales with company number 07101408 and we have 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, and India. 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. The policies include:

- **Recruitment policy.** We conduct eligibility to work checks for all employees in our offices globally to safeguard against human trafficking or individuals being forced to work against their will.
- **Employee policies.** Our employee handbook includes, among other things, 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. These checks, audits and inspections are further discussed below.

- **Third party audit reports.** We request all new suppliers to provide us with copies of any third party audit reports that they have regarding their business processes and internal quality systems. Our quality team reviews all reports submitted and works with the suppliers to agree and implement appropriate actions to correct any issues identified in such reports.

- **Factory evaluation documents.** We have thoroughly evaluated the personnel practices and working conditions of a substantial majority of our existing suppliers through a combination of written questionnaires, oral discussions, and site visits. We require new Chinese suppliers to complete a comprehensive evaluation document that includes detailed questions regarding these matters, and we expect to roll this document out to other key suppliers in China and other countries in the medium term.

During the 2017 financial year, we began commissioning our own impartial third party audits via the social auditing specialist organisation, Bureau Veritas. We view this as an extremely positive step forward in our modern slavery journey as it allows us not only to assess and evaluate the factories with which we have existing relationships, but to do so with new factories that we engage. This is the approach that will be employed when we forge new factory relationships in China and Vietnam, and in the future we hope to be able to employ this impartial approach to our existing factory relationships.

We believe that this process evidences that we are continually aiming to make positive change to improve our practices and demonstrates that we are committed to our corporate and social responsibility.

- **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 previous non-compliance.

None of our due diligence checks and inspections have highlighted any instances of forced labour, servitude, child labour or human trafficking. However, they have brought to light areas in which we believe certain suppliers could make potential improvements to their working conditions. Given that we take our ethical responsibilities seriously, we have worked with these suppliers in order to agree appropriate corrective action plans for implementing such improvements.

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:

- We are committed to continually improving our approach to training, and as such, we will review our current training process in order to ensure that it remains comprehensive and effective.

Our 2016 statement is available [here](#).

This statement has been approved by the Board of Directors of each of MADE and MADE's parent company, Made.com Limited. On 13th November 2018

Signed by:

Signed by:



Philippe Chainieux
Director, Made.com Design Ltd
13 November 2018



Susanne Given
Chairman, Made.com Limited
13 November 2018