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Modern Anti-Slavery and Human Trafficking Statement—For FY 31/12/2024

Introduction

Emergent Crown Contract Office Furnishings Limited (Emergent Crown) recognises and welcomes the Modern Slavery Act 2015 and the duty it places on organisations to disclose publicly the steps they are taking to prevent modern slavery within our business and our supply chains. Emergent Crown has a zero-tolerance approach to modern slavery and we are committed to playing our part in helping to eradicate it. We are committed to improving our practices by acting ethically and with integrity to ensure that modern slavery and human trafficking does not exist anywhere within our own operations or our supply chain.

Our Business & Structure

Emergent Crown is a family-run business that has been manufacturing, sourcing and supplying goods and services since 1988. We specialise in providing quality ranges of office, educational and residential furniture, and we are committed that these products exceed our customers expectations as does our service delivery. This shapes how we work and hour vision of **Changing spaces into Working Places.**

We currently employ around 25 individuals who assist us to achieve the aims of our business and to deliver and consistently produce the highest levels of service that our customers have come to expect. We are based across two premises, both in the Calderdale area of West Yorkshire which allow us excellent distribution access into the motorway network to service our customers nationally.

Our Approach & Commitment to Modern Slavery

As we are contract holders with large Central and Local Government bodies, we are acutely aware that we are in a position that enables us to influence, lead and drive positive change within our Supply Chain and the communities in which we live and work and we take this responsibility very seriously. We take this responsibility seriously, and always act in an ethical and socially inclusive manner. This ethos extends to our approach in transparently tackling modern slavery and taking proactive steps to address the issue.

We understand our responsibility to prevent and mitigate the risks of human trafficking, forced, bonded and child labour; and to respect human rights in our operations and our supply chain, and any infringements of these within our supply chains will not be tolerated.

Responsibility Statement

In order to address modern slavery directly, and despite the fact that the Company falls below the required threshold detailed under Section 43 of the Modern Slavery Act 2015, Emergent Crown is implementing a dedicated Modern Slavery Policy that sets out the company's position in relation to modern slavery.

The policy is designed to set out the requirements the company has on entering into contractual relationships with others and ensures that its employees are aware of their responsibilities in working to ensure modern slavery does not exist anywhere within the company.

We are committed to training employees to recognise potential situations of modern slavery and procedures to report their concerns. Training is provided to employees during initial induction, throughout employment via continual refresher training in seminars, departmental meetings and on-going progression training for their position.

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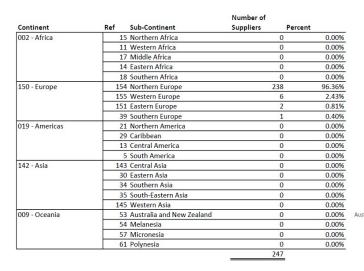


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Our Supply Chain

It is important that we only work with suppliers who share our values and vision, particularly on issues as important as human rights and modern slavery. Our Supplier Code of Conduct, details the standards, ethics, rights and responsibilities that govern the relationships our business has with our Suppliers. We undertake due diligence before approving any potential supplier, then after onboarding, we regularly monitor their performance and modern slavery risk, and continue to work with each to drive improvement within the business. We are further enhancing our due diligence during the sourcing process by effectively mapping our Supply Chain. This enables us to appropriately test, measure and score suppliers to ensure we only trade with those aligned with our values.





Our Policies and Procedures

We continue to support behaviours which are consistent with International Labour Organisation's Core Conventions. We have incorporated the internationally recognised Ethical Trading Initiative (ETI) Base Code within our Supplier Code of Conduct.

The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice. It stipulates the following nine provisions:

- 1. Employment is freely chosen
- 2. Freedom of association and the right to collective bargaining are respected
- 3. Working conditions are safe and hygienic
- 4. Child labour shall not be used
- 5. National Living wages are paid
- 6. Working hours are not excessive
- 7. Discrimination is not practised
- 8. Regular employment is provided
- 9. No harsh or inhumane treatment

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Within our business we adopt many procedures that assist with our management of potential modern slavery and human trafficking issues. These procedures include the following:

Human Rights Policy

This policy applies to all our employees, anyone doing business for or with us and others acting on our behalf. This applies to all locations where we conduct business and to all company-sponsored events. The policy stipulates that it is every Emergent Crown employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment.

Supplier Code of Conduct

The purpose of this policy is to clarify and safeguard the relationship between Emergent Crown and its suppliers, to establish standards that ensure our suppliers operate ethically, are environmentally responsible and that workers are treated with respect and dignity. Our suppliers must have processes in place to maintain these standards and be able to provide evidence if required.

Sustainable & Ethical Purchasing Policy

This policy clearly defines the processes and monitoring in order that all Emergent Crown personnel involved in the Procurement of goods or services should ensure that these are manufactured in an environmentally sustainable method and ethically socially inclusive manner. This details that additional training and certification on Modern Slavery is completed within 6 months of commencement of employment in this area.

Supply Chain Management Policy

This policy applies to all Procurement personnel and in addition to how Supply Chain is to be monitored and managed, it details the procedures to be followed should a potential Modern Slavery issue be identified within our Supply Chain. This also details that in the event of a potential breach being identified, that additional control measures associated to any High-Risk Suppliers.

Whistleblowing Policy

The whistleblowing policy is proactively communicated to employees at initial induction, and throughout by compulsory training for all employees. By empowering employees, staff feel more confident and safe to raise ideas, questions or concerns. Employees can also report concerns anonymously via a link on our internal intranet.

Our Modern Slavery Strategy is aligned with the United Nations Guiding Principles on Business and Human Rights. This strategy is supported by our Supplier Code of Conduct and Human Rights policies and set out our obligations to customers, employees and communities in our own operations and our supply chain. We take any breach of our policies or allegations of labour abuse extremely seriously. Whistleblowing facilities enable our employees, suppliers, and their staff to raise concerns on this or any other issue .

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Due diligence

For the past four years, we increasingly improved our methods of due diligence that we have in place to monitor our Modern Slavery risk, both internally and within our Supply Chain. Within the business we have good workplace monitoring, informal chats with all employees and comprehensive awareness training. Externally our due diligence includes supplier questionnaires, supply chain mapping and annual site visits assessments (both announced and unannounced), which ensure compliance with the Modern Slavery Act 2015

Throughout our monitoring during 2023, no incidents of Modern Slavery were noted or reported.

Escalation, whistleblowing and grievance mechanisms

- We have reviewed our Escalation policy relating to Modern Slavery, and made improvements to include any such
 incident as part of our ISO9001 Complaints procedure should a possible occurrence of Modern Slavery be
 identified, to formalise this, and ensure a prompt resolution.
- All employees are issued with and have access to the Company Employee Handbook which contains all details of referenced polices such as Human Rights and Whistleblowing.
- As detailed within our Supplier Code of Conduct, during site visits and audits, check are made for grievance and whistleblowing mechanisms .

Risk assessment

Emergent Crown considers its position within the market as low to medium risk in relation to Modern Slavery. We recognise that although comprehensive practices are in place to ensure that modern slavery does not exist within direct recruitment and employment within Emergent Crown, the very nature of our complex Supply Chains that this risk can vary throughout different business types.

The following table outlines the identified risk profiles in terms of modern slavery and human trafficking based by business types of our Supply Chain. Identifying highest risks within our business and potential pressure points allows us to have additional focus on these key areas:

High Risk	Medium Risk	Low Risk
Potential overseas originating countries of sourced components from Tier 2 Suppliers	Manufacturer of Low cost products Manufacturer of High volume products	Manufacturers in economically poor regions Manufacturers in geographic areas of high unemployment
No reported Supplier instances		Manufacturers in geographic areas with high migrant population

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2024 Control Measures

In order to mitigate these identified Risks, during the financial year 2024, we implemented the following to assess and manage them:

- Identify methods of Good Workplace practices
- Identify gaps in process to improve discreet reporting of concerns
- Improve Procurement Teams training regarding Modern Slavery
- Identify methods of mapping T2 Supplier Supply Chain
- Create Baseline figures for progress reporting
- Identify additional Training Resources (Toolkits & E-Learning)
- Create Skills Matrix to schedule refresher training on Modern Slavery
- Implement Supplier Code of Conduct

These steps are to be redoubled in 2024, to improve our governance compliance to eradicate Modern Slavery and Force Labour.

Effectiveness

We have establish clear reporting mechanisms for employees and stakeholders to report any suspicions or incidents related to modern slavery or human trafficking, and ensure anonymity and protection for whistleblowers.

We have defined SMART targets and measurable KPIs to gauge the effectiveness of our anti-slavery and anti-trafficking efforts. This include the number of supplier audits conducted, the percentage of suppliers meeting compliance standards, and the number of reported incidents.

We regularly assess the impact of our processes on reducing modern slavery and human trafficking risks, reviewing the data, adapting our initiatives, and collaborating with external organisations to identify areas for improvement.

Measuring effectiveness in combatting modern slavery and human trafficking is an ongoing process that requires commitment, dedication, and the flexibility to adapt to evolving challenges. By regularly review and update our strategies, we are continually identifying ways to improve our impact in eradicating these forms of exploitation from your business and supply chains.

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Training

We continually work and collaborate with leading external organisations, such as <u>unseenuk.org</u> to develop, exchange and participate in training workshops to share knowledge and information to allow our employees and Supply Partners to identify and tackle modern slavery risk effectively. In addition to our own prepared presentations and training resources we also train staff using:

Videos:

Our training of staff includes:

- The Gangmasters and Labour Abuse Authority (GLAA) videos on how to spot the signs of modern slavery, methods used by traffickers to exploit their victims, and victims accounts
- The Independent Anti Slavery Commissioner (IASC) videos on spotting the signs of modern slavery.

Toolkits:

Nottingham University developed Anti-Slavery Partnership Toolkit

E-Learning:

Human-trafficking awareness e-learning course

Organisational Awareness

Through these processes, we have been able to make significant strides in capacity building within the business. Processes and initiatives have helped raise awareness, bringing Modern Slavery and Human Trafficking into sharp focus, whilst changing attitudes and behaviours, imparting knowledge and developing the skills of our staff.

Individual Capacity: Individual Training on Modern Slavery

Departmental Capacity: Training relating to specific areas such as HR and Procurement

Inter-company Capacity: Collaborating externally with External bodies and external Stakeholders, networking

events and co-design solutions.

Industry Capacity: Members of Trade Organisations which provide updates and training.

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Compliance

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Emergent Crown Contract Office Furnishings Limited Modern Slavery and Human Trafficking statement for the financial year ending 31th December 2024.

This statement was approved by Emergent Crown Contract Office Furnishings Ltd.'s board of directors on 2nd January 2024.

Signed by: Philip Gill, Director

Date: 2nd January, 2024

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