

This statement sets out how Karndean Designflooring ("Karndean") complies with the Modern Slavery Act 2015 (the "MSA").

It also explains how we comply with the new guidance in relation to the MSA, which was released by the Government in October 2017.

As a business, we wholly support the purpose of the MSA which is to promote transparency in supply chains and we also note that since the new guidance is intended to drive best practice it will assist businesses with tackling Modern Slavery. This is to be done by encouraging organisations to provide information in relation to six categories, which are set out in Section 54(5) of the MSA. In reporting for FY 2019 we have adopted a new reporting template which more accurately reflects the requirements of the MSA.

## The structure of our organisations, our business and its supply chain

Karndean operates across the UK and Ireland through a network of independent retailers, both large and small and also through distributors and merchant counters. We also work closely with architects, designers, housebuilders and specifiers in the commercial sector as well as public contractors. Throughout mainland Europe we operate through our subsidiary companies under the trade name "Designflooring" with established businesses in both Germany and France. The products we sell are sourced from national and international suppliers including those from Germany, Taiwan, China and South Korea.

## Our Commitment & Understanding of the Impact of Modern Slavery

Karndean International Limited and its subsidiary companies are committed to ensuring complete compliance with the Modern Slavery Act 2015 and demands the same of its suppliers. It is the company's moral and ethical responsibility to ensure that all individuals are treated fairly and respectfully whether in the manufacture and sale of its products or in the services we procure in the course of business. Ownership of this policy resides with the leader of the business but is fully adopted and adhered to by all its employees.

## Our Policies in relation to Modern Slavery and Human Trafficking

Karndean has established an internal Code of Conduct on Ethical Sourcing. This details how we comply with the legislation which is applicable to Ethical Trading, and also sets out the standards we expect of our suppliers and of our employees. In particular, this code of conduct addresses such matters as: conditions of employment; wages and benefits; child labour; modern slavery (which may also be referred to as forced labour) and human trafficking.

We request assurances from all major suppliers each year that they at least adhere to the same policies as Karndean in their working practices. All new suppliers are also evaluated in line with our current policies and all requisite background, visa and permit checks are made when hiring new employees whether directly or through recruitment agencies. We use, professional and respected recruitment agencies with whom we have long-lasting relationships.

The due diligence processes in relation to modern slavery and human trafficking



We assess any instances of non-compliance on a case-by-case basis and will tailor any remedial action appropriately. We will only trade with those companies which comply with these requirements.

Our risk assessment of modern slavery or human trafficking taking place, and the steps we have taken to assess and manage that risk

- Our business does not operate in any of the industries stated to be at higher risk of Modern Slavery as per DeltaNet International reports (link here).
- The responses from suppliers to our supply chain audits have been positive. We
  would propose remedial actions to our suppliers should any of them not meet our
  standards.
- Any new suppliers are risk-assessed for compliance prior to concluding contracts.

## The training available concerning modern slavery and human trafficking

Karndean colleagues have each received training in a variety of areas relating to how we seek to operate as an ethical business. This includes amongst other things: Anti Bribery and Corruption training, equality and diversity policies and whistleblowing policies. These training needs are reviewed periodically and will be further refreshed and delivered again when appropriate.

This statement was approved by Paul Barratt, Managing Director, for and on behalf of Karndean Designflooring on 10<sup>th</sup> December 2020 and will be reviewed on an annual basis.

**Paul Barratt** 

Managing Director

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Previous statements can be found here.