



WHITEMEADOW

Modern Slavery and Human Trafficking Statement

Year ending 31 December 2025

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Introduction

Modern slavery and human trafficking remain some of the most serious human rights issues facing businesses today. These forms of exploitation can occur in any country, industry or supply chain, and they continue to evolve as global migration, economic pressures and criminal networks increase. We recognise that no organisation is immune to these risks, and responsible businesses must remain vigilant, informed and proactive.

At Whitemeadow Furniture Limited, we are committed to safeguarding the wellbeing and dignity of everyone connected to our operations. Ethical conduct is integral to how we work, and we expect the same high standards from all partners and suppliers we engage with. Our zero-tolerance stance means we actively work to prevent any form of slavery, forced labour, servitude or trafficking within our business or supply chain.

We continue to strengthen our internal processes, undertaking regular reviews of our policies, supplier expectations and reporting channels to reduce the risk of exploitation. We also recognise the important role our workforce plays in identifying concerns early. All employees are encouraged to speak up, and managers are required to act quickly and effectively on any issues raised.

Our commitment is simple: to protect the rights of every individual who contributes to our business and to maintain a supply chain built on responsibility, transparency and respect.



Our business

Whitemeadow Furniture Limited has grown significantly since its establishment in 1994 and is now recognised as one of the UK's leading manufacturers of upholstered furniture. With an annual turnover of approximately £54 million, we design, build and supply a wide range of high-quality upholstered products to major retail partners across the UK.

All our furniture is handmade to order, crafted across four dedicated manufacturing sites located within a three-mile radius of our Head Office in Sutton-in-Ashfield, Nottinghamshire. This close geographical footprint allows us to maintain strong quality control, support local employment, and operate efficiently across our production processes.

Our workforce of more than 400 skilled employees spans manufacturing, design, planning, logistics, and support functions. Their expertise and commitment underpin our reputation for craftsmanship, reliability and innovation. Whether developing new designs, producing bespoke orders, or ensuring timely delivery to customers, our teams play a vital part in sustaining Whitemeadow's long-standing position in the UK furniture industry.



Ethical supply chains

Whitemeadow Furniture Limited works closely with a focused group of long-standing Tier 1 suppliers, many of whom we have partnered with for several years. Of our top 50 suppliers, 20 are based in the UK, and we continue to review our supply chain to understand where additional oversight or due diligence may be required. While the UK is generally considered a lower-risk region for modern slavery, we recognise that risks can still be present due to the nature of materials and processes involved in furniture manufacturing.

To better understand our exposure, we have mapped our supply chain to identify geographical and sector-specific risks. Political instability, conflict and population displacement across parts of Eastern Europe have contributed to increased trafficking activity in the region, highlighting the need for enhanced monitoring of suppliers operating in or sourcing materials from affected areas. We also acknowledge that economic pressures, including the ongoing cost-of-living crisis, have increased vulnerability to exploitation across Europe, making robust due diligence more important than ever.

Through regular audits and assessments, we seek assurance that our suppliers provide fair working conditions, offer stable employment, and pay workers appropriately, helping to reduce the likelihood of forced or exploitative labour being present in their operations. We also monitor international risk indicators, such as the Global Slavery Index, which identifies Turkey (Türkiye) as a country with elevated vulnerability to modern slavery. This insight enables us to tailor our oversight and engagement with suppliers operating within higher-risk regions.

We recognise that modern slavery is highly complex and can occur at any point beyond Tier 1 suppliers, particularly in the sourcing of raw materials such as timber, textiles and foam. For this reason, we place importance on collaboration and industry benchmarking. Our work with organisations such as Stronger Together and participation in SMETA ethical audits strengthens our ability to identify risks deeper within the supply chain and ensure that labour rights and human dignity are protected.

Our expectation is clear: all suppliers must uphold high ethical standards, operate transparently, and take proactive steps to prevent exploitation within their own operations and across their own supplier networks. As we continue to develop our monitoring processes, we remain committed to reducing modern slavery risks wherever they may arise and maintaining a responsible, ethical supply chain.



Governance

Our approach to preventing modern slavery is supported by clear governance and oversight across Whitemeadow Furniture Limited. Responsibility for managing the risks of modern slavery sits at senior leadership level, with oversight from the Executive Team. Our HR, Procurement and Operations teams work collaboratively to identify risks, implement due diligence processes and monitor compliance across our business and supply chain.

We maintain internal controls, policies and reporting routes to ensure concerns can be raised confidentially and acted upon promptly. As part of our ongoing governance, we review and update our policies annually, assess the effectiveness of our due diligence activities, and ensure our teams receive appropriate guidance and training. Modern slavery is treated as a standing ethical and compliance concern, and updates or risks are escalated through the appropriate internal channels.



Supplier audits, due diligence & risk assessment

Supplier Due Diligence:

- We assess all new and existing suppliers for ethical, legal and labour-standards compliance, including reviewing policies, Modern Slavery statements, recruitment practices and use of subcontractors.

Audits & Monitoring:

- Our auditing process is constantly evolving to meet the demands of customer and legislative requirements. We currently conduct limited audits with our supplier base and have identified the need to further enhance our process and engagement to meet our aspirations.
- Earlier this year we committed to updating our supplier agreements and are currently reviewing a revised detailed service level agreement [SLA] for all our Tier 1 suppliers which includes mandatory audit compliance with commitments to achieve a minimum standard of SMETA 2 Pillar audit by a mutually agreed date. We anticipate this to be in place towards the end of 2026.
- Strengthening our audit framework remains a key work-in-progress priority.

Risk Assessment:

- We evaluate modern slavery risks based on geography, raw materials used, workforce vulnerability (e.g., migrant or agency labour) and economic factors. This guides which suppliers receive enhanced monitoring.

High-Risk Regions:

- We monitor global indicators, including the Global Slavery Index, and apply strengthened due diligence for higher-risk countries such as Türkiye.

Collaboration:

- We use industry-recognised frameworks (e.g., Stronger Together, SMETA) to benchmark standards and improve visibility beyond Tier 1 suppliers.

Escalation & Remediation:

- Concerns are escalated internally, and actions may include remediation plans, intensified audits or, where necessary, suspension or termination of the supplier relationship.

Our policies

Whitemeadow Furniture Limited has a comprehensive framework of policies and internal controls designed to prevent modern slavery and human trafficking within our business and supply chain. These policies set out clear behavioural expectations for employees, suppliers and business partners, and support our commitment to operating ethically, transparently and in full compliance with the law.

Human Rights Policy

Our Human Rights Policy outlines our commitment to respecting and promoting fundamental human rights in line with internationally recognised standards. It reinforces our zero-tolerance approach to forced labour, child labour, servitude and exploitation, and ensures that dignity, equality and fair treatment underpin all employment and sourcing practices across the business.

Anti-Slavery and Human Trafficking Policy

This policy sets out the actions and responsibilities for preventing modern slavery in our operations. It defines the various forms of exploitation, details the warning signs employees should be aware of, and makes clear that any breach of the policy will result in disciplinary action or termination of supplier contracts.

Whistleblowing Policy

Employees, contractors and suppliers are encouraged to raise concerns confidentially through our Whistleblowing Policy. This policy ensures that anyone reporting suspected unethical, unsafe or exploitative practices, including modern slavery concerns – can do so without fear of retaliation. Managers are required to act promptly on any concerns raised.

Group Code of Conduct

Our Code of Conduct establishes the ethical standards expected of all employees. It includes guidance on fair treatment, legal compliance, responsible business behaviour and safeguarding human rights. All employees receive induction training and ongoing communication to reinforce these expectations.

This framework helps ensure that our policies are grounded in robust, internationally respected guidance.

Our policies continued...

Supplier Code of Practice

Our Supplier Code of Practice outlines the standards we expect from our Tier 1 suppliers and, where appropriate, their upstream partners. It includes requirements relating to:

- freely chosen employment
- prohibition of forced or bonded labour
- prevention of child labour
- fair wages and working hours
- safe working conditions
- non-discrimination and equal treatment
- ethical recruitment
- transparency and cooperation with audits

We reserve the right to suspend or terminate supply arrangements where non-compliance is identified.

Recruitment Policy and Right-to-Work Checks

Our Recruitment Policy ensures that hiring processes are fair, transparent and compliant with right-to-work laws. We do not use recruitment fees, and we do not engage agencies that do not meet our standards on worker welfare. All employees undergo identity verification and legal entitlement-to-work checks before employment begins.

Modern Slavery Guidance for Managers

We provide managers with practical guidance to help them identify indicators of exploitation, manage concerns appropriately and escalate issues in line with our governance framework. This includes training on hidden labour exploitation, ethical recruitment, responsible supervision and how to support vulnerable individuals.

Alignment With Ethical Standards

In line with last year's commitments, we continue to follow the Ethical Trading Initiative (ETI) Base Code, which is based on internationally recognised labour standards and covers:

- freely chosen employment
- safe working conditions
- prohibition of child labour
- living wages
- reasonable working hours
- non-discrimination
- no harsh or inhumane treatment

This framework helps ensure that our policies are grounded in robust, internationally respected guidance.

Training and raising awareness

We provide training to increase awareness of modern slavery risks across our business, ensuring employees understand how exploitation can occur and how to identify warning signs.

Key Managers and Directors receive enhanced training, including specialist sessions delivered in partnership with recognised organisations such as Stronger Together.

All employees complete Modern Slavery e-learning as part of induction and refresher cycles, supported by internal communications that reinforce ethical practices and reporting routes.

Managers receive targeted guidance to help them identify hidden labour exploitation, assess risk indicators and respond appropriately to concerns.

Ongoing training ensures our teams remain alert, informed and confident in preventing exploitation across our operations and supply chain.



Supplier adherence to our values and ethics

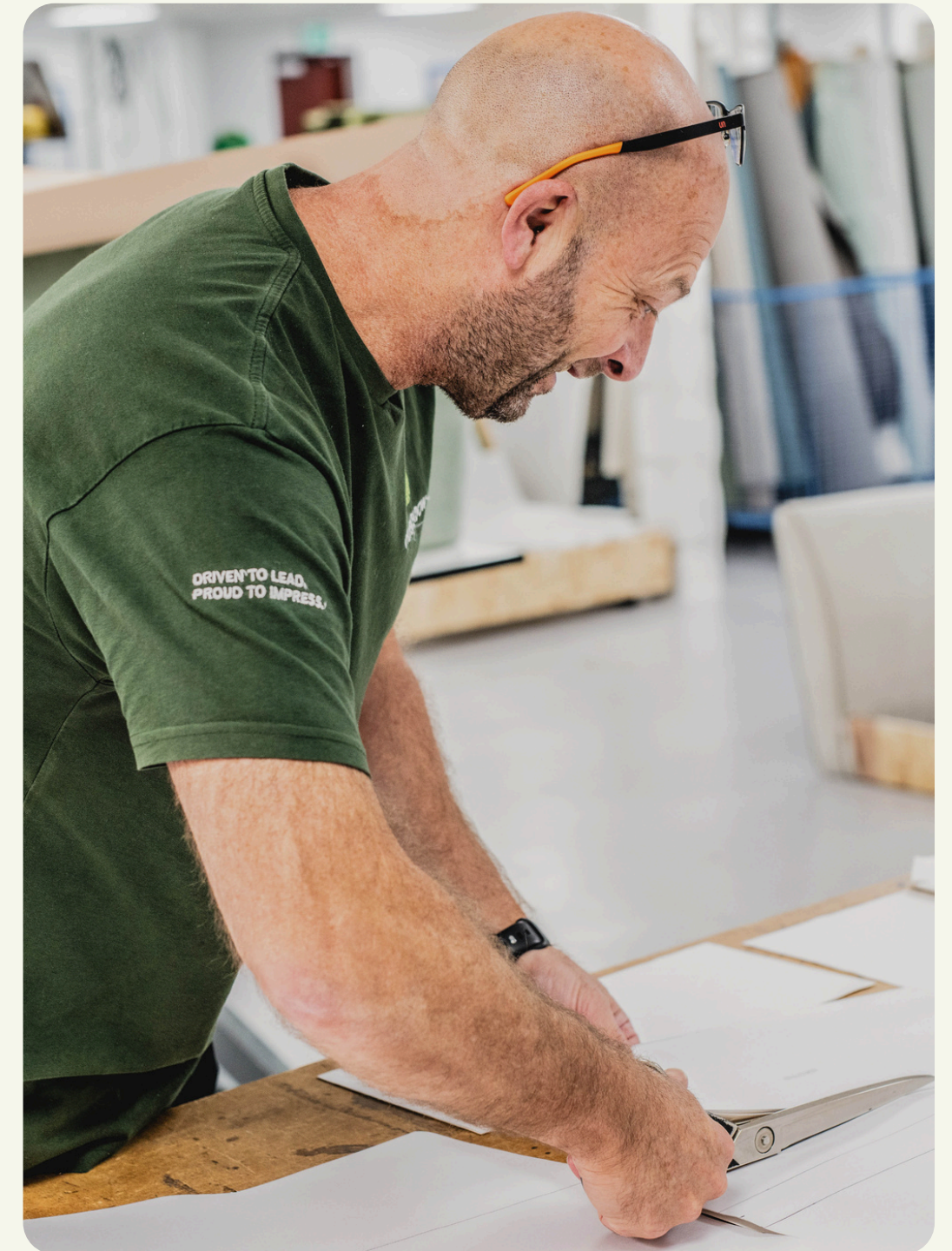
All suppliers are required to comply with our Supplier Code of Practice, which sets clear expectations on labour standards, ethical recruitment, working conditions and human rights.

We only work with suppliers who demonstrate a commitment to ethical conduct, transparency and continuous improvement in managing labour risks.

Suppliers must provide evidence of policies aligned to our standards (e.g., anti-slavery, human rights, ethical trading) and cooperate fully with audits, assessments and investigations.

Where suppliers operate in higher-risk countries or sectors, we apply enhanced due diligence and monitoring to ensure alignment with our values.

Non-compliance may result in corrective action requirements, suspension of orders or termination of the commercial relationship.





Our commitments for the year ahead

Strengthen Policies:

- Update and formally approve our Anti-Slavery, Human Rights and Whistleblowing policies to reflect current best practice.

Increase Supplier Assurance:

- Introduce more frequent compliance confirmations from Tier 1 suppliers and require prompt reporting of any labour concerns.

Expand Training:

- Increase the number of colleagues completing modern slavery and ethical-sourcing training, including Stronger Together and SMETA programmes.

Review Recruitment & Agency Controls:

- Strengthen checks on labour providers to ensure we only work with reputable, ethical agencies.

Maintain Ethical Supplier Standards:

- Continue requiring all suppliers to uphold robust policies and labour practices aligned with our values.

Monitor Global Risks:

- Track geopolitical developments and refine our audit focus on higher-risk regions to better identify emerging human rights risks.



Board of Director's approval

This statement has been approved by the Board of Directors of Whitemeadow Furniture Limited in accordance with Section 54, Part 6 of the Modern Slavery Act 2015. It outlines the actions taken during the financial year ending [insert year] to prevent modern slavery and human trafficking within our operations and supply chain.

This statement relates to the activities of Whitemeadow Furniture Limited and the following subsidiary companies:

- Branded Furniture Company

The statement will be published on the UK Government's online Modern Slavery Statement Registry and will also be available on the Whitemeadow Furniture Limited website. A printed copy can be requested from the Head of Group HR.

Signature:

Andy Kitchen | Chief Executive Officer
Whitemeadow Furniture Ltd.

Date: 31 March 2026