

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 for the financial year ending 28th February 2023.

Introduction

Modern slavery exists in the form of servitude, forced or compulsory labour and human trafficking for personal or commercial gain. Orangebox has a zero-tolerance approach to any and all forms of modern slavery.

We are committed to acting ethically and with integrity in all of our business activities and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in the businesses throughout our entire supply chain.

This statement relates to actions and activities undertaken during the financial year 1st March 2022 to 28th February 2023. It sets out the actions we have taken to understand and address all potential areas of risk in relationship to modern slavery, and the steps we are taking to ensure that there is no slavery or human trafficking throughout the Orangebox business and its supply chains.

Our Business and Organisational Structure

Orangebox is a designer and manufacturer of innovative furniture for the modern workplace. The business is run by a board of ten Directors, and our turnover in the financial year ending 2023 was £72m.

Our Head Office and main manufacturing site are based in South Wales, UK and we also have design offices and showrooms in Huddersfield, London and the UAE.

Our Supply Chains

We have a global supply chain of materials, circa 70% of which are sourced from within the UK, 25% from the rest of Europe, and 5% from China.

We are committed to working only with highly reputable suppliers, each of whom needs to satisfactorily complete our Supplier Assessment Process before they can be appointed. This is to ensure that their due diligence and ethical practices are aligned with our own Ethical Purchasing Policy. In addition, we reserve the right to audit our suppliers to ensure compliance.

The relationships we enjoy with our suppliers are well established and long lasting. The monitoring and regular review process enables us to ensure ongoing compliance by all suppliers to our Values and Policies. For the recruitment of temporary agency workers, we use one main local recruitment consultancy, which has undergone a rigorous assessment of due diligence and ethical practices.

Responsibilities

The departmental responsibilities relating to modern slavery are as follows:

- HR Department: the research and development of relevant employment policies relating to modern slavery.

- Management team and Directors: the implementation and enforcement of the relevant policies.
- Supply Chain Department: the research and development of the Ethical Purchasing Policy and Supplier Assessment methodology.
- Supply Chain Manager and Operations Director: the implementation and enforcement of the above policy.

Relevant Policies

We have a number of policies in place to support our zero-tolerance approach to slavery and human trafficking offences, both within our own business and within the businesses in our supply chains.

To raise awareness of the issue of modern slavery and ensure that all members of staff understand the procedures for reporting any areas of concern, we communicate the following policies across the business:

- Equal Opportunities Policy.
- Recruitment & Selection Policy.
- Whistle Blowing Policy.
- Grievance Policy & Procedure.
- Ethical Purchasing Policy.
- Business Conduct (Bribery & Gifts) Policy

Risk Assessment & Management

The following activities or areas of business are considered to present a potentially higher risk of modern slavery or human trafficking:

- Hiring of agency workers via external recruitment suppliers.
- Wider supply chain, such as 2nd and 3rd tier suppliers.

Due Diligence Processes

In relation to the recruitment of new employees within the Orangebox business, we conduct appropriate proof of eligibility to work checks in line with legislation, and provide all new employees with clear, legally compliant employment contracts. We also ensure that:

- All payroll processes and deductions from wages adhere to legislation.
- All employees are paid fairly, and that we adhere to National Minimum Wage (NMW) legislation.
- We keep our policies up to date in support of fairness and equality and have clear reporting routes for any grievances or issues relating to poor treatment of employees or agency workers. Reporting routes are detailed in our Equal Opportunities Policy, Whistle Blowing Policy and Grievance Procedure.
- All external staffing suppliers adhere to equivalent policies and procedures.

In relation to the hire of agency workers, we build and maintain close working relationships with our external staffing suppliers to ensure our policies and procedures are communicated correctly.

We conduct annual audits of the processes undertaken by all our recruitment agency suppliers, to ensure that:

- There is no evidence of forced labour, slavery or human trafficking.
- Appropriate checks for proof of eligibility to work are being conducted.
- No identity documents are withheld.
- Workers are not charged any illegal recruitment fees.
- Workers are provided with clear, legally compliant contracts (where applicable).
- No illegal deductions are made from wages.
- Workers are paid correctly and in line with NMW legislation.

When sourcing and appointing suppliers, we:

- Follow a rigorous supplier assessment and selection process. Inclusive of 2nd and 3rd tier supplier investigation.
- Issue new and existing suppliers with our Ethical Purchasing Policy.
- Encourage our strategic suppliers to implement best practise and manage subsequent tier suppliers to ensure full compliance.

Effectiveness in Measurement of Activities

At the moment we conduct new starter audits of personnel files on all new employees within our own business.

We aim to improve measurement in future through:

- Changes to the new supplier assessment process to incorporate a clearer investigation into signs of modern slavery within employment practices.
- Carrying out quarterly audits on suppliers of our agency workers.
- Seeking certification from our suppliers on compliance with our policy.
- Suppliers must be able to demonstrate compliance to our Ethical Purchasing Policy on request and to the satisfaction of Orangebox.

Training & Awareness

We aim to:

- Promote awareness among all staff within the business through the communication of our Modern Slavery Policy.
- Provide further relevant training to all those involved in managing our supply chain relationships on how to recognise signs of modern slavery, and on the correct use of processes and audits.

Reporting of Concerns

If any Orangebox employee has reason to suspect activities relating to modern slavery or human trafficking within either our business or our supply chain, they must immediately report these suspicions to their Departmental Manager.

We operate a Whistle Blowing Policy that should be consulted in the reporting of such concerns.

Orangebox recognises that ongoing development of our current initiatives will improve our handling of issues relating to the prevention, detection and handling of modern slavery within our business and our wider supply chain.

This statement was approved by the Board of Directors of Orangebox.

Signed: 

Print: J.A. DZEPPOSE

Title: OPERATIONS DIRECTOR

Dated: 17/8/2023