

High Seat Holdings Limited

Modern Slavery Act Statement for the year ended 31st December 2022.

This statement, written in accordance with Section 54 of the Modern Slavery Act 2015, relates to High Seat Holdings Limited and its subsidiaries, High Seat Limited and HSL Manufacturing Limited (together “we”, “HSL” or “the Group”).

It sets out the actions that the Group has taken in the year ended 31st December 2022 to consider and mitigate the risk of modern slavery arising within our business and supply chain, and the further future actions which we intend to take.

Commitment

HSL will not tolerate any form of slavery, forced labour or human trafficking; and we are committed to taking all practical steps and maintaining controls across the operations and supply chain of our Group which support their abolition.

Overview of HSL

Since 1968, the Group’s subsidiaries have manufactured and sold furniture to the over-65s. We improve the wellbeing of these customers through Feel Good Furniture, which offers enhanced comfort and support and which improves mobility. We design and produce a large majority of these products in our own factory in Batley, West Yorkshire, as well as working with a small number of carefully selected partners. We only sell to consumers directly, via 54 UK-based retail showrooms and a national ‘Home Visit’ operation.

In 2022 the Group employed an average of 485 colleagues, who were all based solely in the UK. Most of these colleagues work from one of our showrooms, our two warehouses in the UK, or at Comfort House: our factory and office facility in West Yorkshire. A number of field-based colleagues visit customers in their home or deliver furniture, but these too are linked to one of our operational sites and so work in close proximity every day with fellow HSL colleagues.

HSL’s supply chain

Retail supply chain

HSL is proud to sell furniture which is handmade in Great Britain and in the year ended 31st December 2022 this continued to represent a very large majority of orders placed by our customers.

Although our own factory dominates HSL’s furniture supply chain, the remainder of furniture purchases are largely supplied by two partners, both also based in Yorkshire, which have each operated in the upholstered furniture industry for more than 50 years.

All of the small minority of furniture sourced from outside of the UK is from a single, reputable international group headquartered in Europe. The coordination of key partnerships such as this are overseen by HSL’s board of directors and are closely managed day-to-day by HSL’s senior management team.

Similarly, from a service point of view, throughout 2022 the majority of customer deliveries were completed using HSL’s in-house logistics operation, established in the prior year.

Manufacturing components

Within the group’s factory, raw materials including timber, foam, fabric, lift-and-recline mechanisms, and electrical components are sourced from longstanding suppliers to the Group. Many of these are manufacturers or wholesalers based in the UK, Europe and the United States. Again, the supply base is

underpinned by a small number of key partners, who we have typically worked with for many years and who are managed by HSL either by directors or senior managers.

Collectively, the highly vertical nature of our business means we consider that we have high visibility and strong control over our supply chain.

Our policies on slavery and human trafficking

HSL is committed to protecting human rights in its business and supply chain. We have a Group purchasing policy and standard buying terms and conditions, which include an anti-slavery policy.

We formally document our commitment to the Modern Slavery Act, the standards we expect from key suppliers, and we are clear in our stance that we will not tolerate any breaches of the act by suppliers.

Due diligence processes

HSL was established by the Burrows family in 1968 and is still owned and managed by the same family today. This results in a brand which is led by the same traditional values it was founded with; one which is committed to exceptional customer service and products which care for people and for the planet.

Through both training and regular communication, we ensure that all HSL colleagues recognise their collective responsibility for protecting our brand and advancing the Group's responsibilities to society.

The performance and suitability of all partners is monitored through ongoing measurement of customer satisfaction scores, follow-up calls from HSL's customer services team, customer surveys and other independent feedback mechanisms including Trustpilot.

Recruitment activity is rigorous and follows clear procedures, managed by our centralised People Support team, including checks that all appropriate right-to-work documentation is in place. All recruitment is overseen by members of the senior management team and ultimately authorised by the board of directors. Agency labour, albeit representing only a small proportion of the Group's working hours and typically used to address absence or temporary recruitment gaps, is again managed by HSL People Support and coordinated through established recruitment agencies in the UK. Such temporary staff have clear induction processes and oversight by HSL's team leaders and managers.

Several channels exist to allow feedback from all HSL colleagues, offering the opportunity to report any concerns. These include clear management structures and lines of support, colleague listening groups, and a confidential survey undertaken each year by all colleagues. Free access is also given to a confidential Employee Assistance Programme, offering counselling and guidance to those who need it.

Risk assessment

The Group's Board of Directors has overall responsibility for corporate governance, including HSL's anti-slavery initiatives. Despite the Group's supply chain being significantly internal, concentrated on a small number of suppliers, and heavily weighted towards the UK, the directors understand that there remains a risk of exposure to modern slavery in any business.

The close involvement of board members in all key operational matters means that, if issues were to be identified or we had reasonable grounds to suspect slavery or human trafficking within our supply chain, this would be investigated at the most senior level and appropriate action quickly taken to:

- Protect whistle-blowers.
- Report such suspicions and provide information to the relevant authorities; and
- Immediately suspend or terminate any associated business arrangement or contract.

Assessment of effectiveness

During 2022, our focus has remained as consistently on our core values and our responsibilities to society including the safety and wellbeing of people. As the risks of COVID-19 further eased, we increased the regularity of our face-to-face interactions with our key suppliers, and continued to explore opportunities to bring aspects of our supply chain as close as possible to under own control.

Wherever changes of supplier arose, we continued to apply our established supplier due diligence processes, which are proactively managed by senior colleagues and overseen by board members.

We recognise that the commitment to a zero-tolerance approach to abuses of human rights is a process of continuous improvement. We will continue to regularly assess our effectiveness in this regard.

Future impacts

The group will continue to refine processes which increase transparency within our supply chains and minimise risk of modern slavery. Training and support to colleagues across the business will play an important role in this journey, to ensure that the risks remain visible to all colleagues across the Group.

This statement is approved on behalf of the Board by William Burrows, Group Chairman.

A handwritten signature in black ink, appearing to read 'Will', followed by a long horizontal flourish.

16th May 2023