



## MODERN SLAVERY STATEMENT

### OUR BUSINESS AND SUPPLY CHAIN

Sterling Furniture Group Ltd is a leading furniture retailer, trading in Scotland. There are 14 geographical trading outlets plus an online store and the majority of product is furniture and home furnishings. In addition we have 4 homestores and one garden centre.

Head Office is in Tillicoultry as is the main Flagship Store.

Product is sourced both from the UK and abroad, including Europe and the Far East.

### ASSESSING RISK AREAS

Utilising the information provided in the Global Slavery Index, areas of higher risk and areas of greater and lesser activity to prevent modern slavery are identified. We have again reviewed this and note that there are no significant changes to the position as it affects our Company.

A significant proportion of our furniture is manufactured outside Europe. This is an area identified as higher risk and is monitored internally.

It is however important to also maintain a vigilance in other areas of the globe and in the home UK market.

### STEPS TAKEN TO PREVENT MODERN SLAVERY

Sterling Furniture prohibits all areas of its business and supply chain from using slavery and human trafficking of any kind. Sterling Furniture also accedes that it is impossible to eradicate all events and is keen to play its part in influencing what it can.

Sterling Furniture's internal protection against modern slavery is to ensure that all business activity complies with the minimum wage legislation. This is also expected of contractors. Sterling Furniture has the checks in place to ensure that all employees and workers have the right to work in the UK and requires that UK contractors only employ staff with the right to work in the UK.

Sterling Furniture is a member of a buying group, Associated Independent Stores (AIS) based in Solihull. AIS co-ordinates and monitors the buying from and suppliers of both furniture and homewares. AIS employs independent consultants based in Honk Kong, who visit and audit the manufacturers in the Far East, including China, Vietnam, Philippines. The Covid-19 global pandemic has affected the ability for travel and visits to factories and remote communication is unlikely to be as effective as direct. We are aware of this vulnerability and deviation from our normal programme and will look to seeing that they are reinstated as soon as the pandemic allows.

We have appointed a Compliance Manager to this end.

In addition our buyers and quality controllers would normally visit our manufacturers and suppliers, including those in the Far East, and make an assessment as part of the buying and SLA negotiations. As stated, tackling the aspect of modern slavery has its limitations in a remote platform but 'normal' business will resume as soon as restrictions allow.

Buyers across the membership of AIS are encouraged to feed in to AIS on any areas of concern or evidence of modern slavery.

A significant number of Sterling's suppliers have been supplying product to us for many years and relationships build over time. Complacency is however not an option and the checks above are also relevant to the ongoing supply chain arrangements.

## **TRAINING**

Our Buyers have been trained to recognise potential risks and to highlight areas of concern.

The Payroll Team have been trained on the legislation and papers required to prove the right to work in the UK.

Managers have received training to intercede at point of interview with regards to the rights to work in the UK and this will be on going to refresh knowledge.

## **OUR NEXT STEPS**

Sterling Furniture will continue to work with suppliers, with the identification and prevention of Modern Slavery on the agenda for business negotiations and SLAs.

We have developed a process of gathering feedback and information from our new suppliers and this will be on-going.

Development of a factory profile questionnaire is being designed - to be completed by potential new factories to learn about their technical and ethical profile - assisting our Buyers in assessing the risk.

This statement is made pursuant to section 54(l) of the Modern Slavery Act 2015 and constitutes Sterling Furniture Group's slavery and human trafficking statement for the financial year ending February 2021.

A handwritten signature in black ink that reads "Lesley Graham". The signature is written in a cursive style with a prominent underline under the letter 'y'.

Lesley Graham  
Deputy Managing  
Director  
16<sup>th</sup> February 2021