

MODERN SLAVERY STATEMENT

Organisation Structure and Business Activities

Ashley Manor, a division of TCM Living, is a leading UK-based furniture manufacturer specialising in upholstery production for the domestic and contract customers. Our primary manufacturing facility is located in Dudley, West Midlands, where for the past 30 years we have established ourselves as a significant employer in the region. We design, manufacture, and distribute high-quality upholstered furniture to retailers across the United Kingdom and European Union.

Our business operates from a state-of-the-art manufacturing facility, employing skilled craftspeople, designers, and support staff. The company's operations encompass the entire furniture manufacturing process, from design and development through to production and distribution. Our supply chain extends both domestically and internationally, including suppliers of raw materials such as timber, fabrics, foam, and various components essential to furniture manufacturing.

We maintain strong relationships with our stakeholders, including employees, suppliers, customers, and our local community in Dudley. Our business model is built on principles of quality, sustainability, and ethical manufacturing practices.

Organisational Policies

We maintain a comprehensive framework of policies that demonstrate our zero-tolerance approach to modern slavery and human trafficking throughout our operations and supply chain. Our Modern Slavery and Human Trafficking Policy sets out our fundamental principles and commitment to ethical business practices. This is supported by our Ethical Trading Policy, which aligns with the ETI Base Code and establishes clear standards for labour practices and working conditions.

Our Whistle blowing Policy provides a secure and confidential mechanism for reporting concerns, while our Recruitment and Employment Policy ensures fair and transparent hiring practices. The Manufacturing Partner Standard Handbook serves as a comprehensive guide for all our manufacturing partners, setting out our expectations and requirements for ethical business practices including tackling modern slavery.

These policies undergo regular review and updates to ensure they remain effective and compliant with current legislation and best practices. Each policy is communicated clearly to all relevant stakeholders and is readily accessible to all employees.

Due Diligence Processes

Our approach to due diligence is systematic and thorough. We regularly conduct risk assessments throughout our supply chain, examining both direct suppliers and sub-contractors for potential risks of modern slavery or human trafficking. Our supplier auditing program, based on ETI Base Code principles, involves both scheduled and unannounced visits to supplier facilities. As a member of SEDEX (Supplier Ethical Data Exchange), we leverage their comprehensive platform for managing and monitoring ethical supply chain data, which enhances our ability to assess and mitigate risks across our global supply chain. Before entering into new supplier relationships, we conduct comprehensive pre-contract screening, which includes detailed questionnaires and background checks. Existing supplier relationships are subject to ongoing monitoring through regular performance reviews and compliance checks. We also conduct regular internal audits of our own operations to ensure we maintain the highest standards of ethical practice.

Risk Assessment and Management

Through careful analysis, we have identified several key risk areas in our operations and supply chain. The complexity of global supply chains presents inherent risks, particularly in regions where labour standards may be less stringent. We recognise that manufacturing practices, especially in labour-intensive industries like furniture production, require careful oversight. The use of agency and temporary workers also presents specific risks that need careful management.

To address these risks, we implement a multi-faceted management approach. Our supplier assessments are comprehensive and include both document reviews and site visits. We maintain detailed supplier records and regularly review our risk assessment criteria to ensure they remain relevant and effective. All contractual agreements include specific provisions regarding modern slavery prevention and ethical labour practices.

Key Performance Indicators

To measure the effectiveness of our anti-slavery initiatives, we track several key performance indicators. We monitor the number and frequency of staff training sessions completed across all levels of the organisation. Our supplier audit results are carefully documented and analysed for trends and areas requiring improvement. We track all reported incidents related to modern slavery concerns and measure our response times to any identified issues. The percentage of suppliers who have signed and comply with our Standards Handbook is regularly monitored and reviewed.

Training and Capacity Building

Our training program is comprehensive and tailored to different roles within the organisation. All new employees receive modern slavery awareness training as part of their induction process. We provide regular refresher training for existing staff to ensure continued awareness and understanding of the issues. Our procurement teams receive specialized training focused on identifying and addressing risks in the supply chain. Management personnel undergo additional training on risk identification and mitigation strategies.

Supply Chain Management

Our supply chain management strategy centres on transparency and accountability. All suppliers must adhere to our Standards Handbook, which outlines our expectations regarding ethical business practices. We conduct regular supplier assessments and monitoring visits to ensure compliance with our standards. Our approach emphasises clear communication of expectations and a partnership approach to improvement. All supplier contracts include specific obligations regarding modern slavery prevention and ethical labour practices.

Reporting and Response Mechanisms

We have established robust reporting mechanisms for raising concerns about modern slavery and human trafficking. Our procedures include clear reporting channels and protected whistle blowing processes, including access to Safecall, an independent whistle blowing helpline that provides confidential reporting services.

We maintain defined investigation processes for all reported concerns and have established re-mediation procedures for addressing any identified issues. When necessary, we engage with relevant authorities to ensure appropriate action is taken.

Commitment to Continuous Improvement

We remain committed to continuously improving our approach to preventing modern slavery and human trafficking. This includes regular policy reviews and updates, strengthening our due diligence processes, enhancing our training programs, improving supplier engagement, and developing more robust monitoring systems.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ashley Manor's slavery and human trafficking statement for the financial year ending 2024.

This statement was approved by the Board of Directors.

Signed: 

Nic Furlong
Managing Director
Ashley Manor

Date: December 12, 2024