



‘Supplier Code of Practice’

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DFS Trading Limited (DFS)

FOREWORD:

This document has been produced by, the Group Support Centre Quality Department confirmed and approved by Nick Smith (DFS CEO), on behalf of DFS Trading Limited.

The Code of Practice has also received the input and feedback from the quality team and other senior leaders in the business.

This Code of Practice and related audit documentation may also be used by subsidiaries under the DFS Group of companies.

All efforts have been made to ensure this document is correct at the time of producing it. The opinions and advice expressed are given in good faith. However, the author and approval panel cannot be held responsible for any action resulting from the contents of this document as the ultimate interpretation of the relevant regulations rests with the UK and European Courts.

This document is a Code of Practice and a standard where DFS Trading Limited would expect suppliers to adhere too. Where serious doubt occurs, a professional legal opinion should be sought, and concerns raised via the complaints process detailed in clause 9.0 of this document.

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1.0 INTRODUCTION:

The Code of Practice for supplying partners of furniture components and finished articles, sets out DFS criteria for assessing quality and compliance policies, processes, and procedures. All DFS supplying partners, and component suppliers of furniture must have in place to demonstrate compliance to relevant UK and European Regulations, and DFS expectations of best practice.

There will be an annual audit which will demonstrate that supplying partners have robust processes and procedures in place that provides suitable due diligence systems to sufficiently address the requirements of the relevant industry regulations and DFS best practice expectations.

Supplying partners who are compliant to the Code of Practice will have one annual audit, however, failure to meet audit requirements will result in follow up audits as detailed in this Code of Practice.

The Code of Practice has been developed to demonstrate compliance for domestic upholstered and unupholstered furniture. The principles of the Code of Practice will also be used to demonstrate compliance with the UK's standards for mattresses and other homeware consumer products.

This Code of Practice is not limited to suppliers solely based in the UK or those supplying just domestic upholstered seating. It should be noted that suppliers based outside the UK and those who supply DFS home ranges will also be required to comply with this Code of Practice.

It should be noted that approval to the DFS Code of Practice itself does not imply that a particular product or supplier is fully compliant with any relevant UK or European regulation.

1.1 THE MAIN OBJECTIVES OF THE DFS CODE OF PRACTICE ARE:

- a) To ensure consistency of quality control, compliance to relevant UK and European regulations and DFS best practice expectation for all suppliers of finished articles and component suppliers.
- b) To reassure DFS customers and other stakeholders that all suppliers of finished articles and components have been subject to an audit by an approved DFS representative and can demonstrate an acceptable due diligence system that complies with relevant UK and European Regulations, and a level of quality control according to DFS expectations and best practice.
- c) To provide all DFS suppliers with a final report and certificate to celebrate being an 'Approved DFS Supplier'.
- d) To give all suppliers assistance when required to help them achieve the expected level of requirements in this Code of Practice.
- e) To encourage good practice within the industry to help DFS meet its responsibility with a wide range of stakeholders.
- f) To discourage and remove poor practice. If our supply base is operating poor practice in any respect or refuse to take part in this Code of Practice supplier auditing system, then DFS is failing to meet its responsibilities and obligations to our customers and other key stakeholders such as the governing bodies in the UK and Europe.
- g) To ensure that DFS only uses suppliers whose policies, processes and procedures meet our Code of Practice which will support and enhance DFS position as UK furniture market leader, which in turn will result in continued, growing business across the DFS supplier base.

1.2 BENEFITS OF THE CODE OF PRACTICE FOR DFS AND DFS SUPPLIERS

This Code of Practice aims to provide clear identification of those suppliers of finished articles and component suppliers who, by choosing to fully support DFS in this due diligence system, can demonstrate to any stakeholder that they have the specified competency and controls in place to ensure their ongoing ability to meet the requirements of the DFS Code of Practice and remain a supportive, and highly valued business partner.

This Code of Practice will enable DFS to monitor the on-going quality and compliance of our suppliers of finished articles and component suppliers whilst understanding that the approach to due diligence and best practice systems used will be consistent across all DFS approved suppliers.

Once a supplier has successfully met the requirements of this Code of Practice, it will then be possible to use this as evidence of due diligence and recognition as a DFS approved supplier.

If for any reason the business relationship comes to an end, the DFS approved status although no longer active, is still proof of key compliance areas that any potential customer would see as a positive measure.

When considering new suppliers for selection, compliance with this Code of Practice will assist the buyer in determining whether a supplier would meet DFS expectations for the supply of domestic upholstered furniture and home ranges.

All suppliers must evidence compliance with the DFS Code of Practice by completing the annual audit as agreed and by providing satisfactory documentation.

2.0 DEFINITIONS

For the purposes of this Code of Practice:

Manufacturer:

May be considered as companies or individual(s) considered to have treated, assembled, constructed or purpose built a finished article (product) or part of a finished article like a component (E.g., Fillings and Covers) including any sub-contracting companies too.

Supplier:

May be considered as companies or individual(s) who have either manufactured themselves or purchased finished articles (products) for resale.

Importer:

May be considered as companies or individual(s) who to have purchased any kind of product from outside the UK for resale inside the UK or overseas.

Wholesaler:

May be considered as companies or individual(s) who have purchased any kind of product from outside or inside the UK for sale inside the UK or overseas.

Retailer:

May be considered as a business who offers any form of product or finished article which may or may not be unique to them. In some cases, the retailer may also be a manufacturer or first importer.

Upholsterer:

May be considered as an individual or company who manufactures, reworks, or repairs upholstered furniture for themselves or as part of a company production line.

Upholstered Furniture:

An article or finished product that comprises of a cover material covering a filling material and either stitched or staple to enclose the filling inside.

Due Diligence:

This is defined as “reasonable steps taken by a business or person to avoid committing an offence”

ILAC:

The International Laboratory Accreditation Cooperation is a committee who accredit global accreditation bodies. Accreditation bodies like UKAS and CNAS are signatories of the ILAC so they both can equally accredit laboratories to ISO standards like ISO17025.

IAF

The International Accreditation Forum is a committee who accredit global accreditation bodies. Accreditation bodies like UKAS and CNAS are signatories of the IAF so they both can equally accredit businesses to ISO standards like ISO17065 and ISO17021. E.g., BSI have both accreditations to audit against Management Systems and provide Product Schemes like the BSI Kitemark.

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UKAS:

Is the UK's only accreditation body based in the UK, who accredits businesses like test houses to international standard ISO17025. UKAS is a signatory of both ILAC and IAF.

BSI:

The British Standards Institute (BSI) develops British standards and sits on committees such as European and International standards organisations. Accredited by UKAS and other bodies like North America.

UKCA:

United Kingdom Conformity Assessed is the new CE mark for the United Kingdom, this mark can be used with or in replacement of the CE mark for the UK market.

BS:

British Standard or test method (E.g., BS5852 or BS7177). Developed by the BSI.

Note: Some British Standards may use European test methods (E.g., BS7176)

EN:

European Standard or test method (E.g., EN1021). Developed by CEN.

Note: Some British Standards may use European test methods.

ISO:

International Standards Organisation, a committee of national standard agencies like BSI. The ISO develops international standards (E.g ISO9001).

CEN:

European Committee for Standardization, BSI sit on the committee, both CEN and BSI sit on ISO. CEN develops all EN standards and European Directives. For example, the CE mark is well known.

Legislation:

Laws or the making of laws.

Regulations:

A rule or directive upheld by the government.

Declarations:

A formal statement, E.g., REACH - a statement signed that one complies.

DFS Approved Supplier:

A company that has been audited and meets the requirements of this Code of Practice.

DFS:

For this Code of Practice, in short DFS, is in meaning to DFS Trading Limited only.

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3.0 BACKGROUND

As an International manufacturer, importer, and retailer, the DFS is seen as a market leader and therefore, must exercise a comprehensive due diligence audit to ensure that the volumes the DFS produce is fit for purpose and compliant to all relevant UK, European and International legislation.

The DFS Code of Practice audit is a structured analysis to document global suppliers to verify quality and compliance, and best practice of a supplier's products, processes, and procedures.

Investigations by consumer organisations, enforcement bodies and the media have shown that some manufacturers, importers, retailers, and similar organisations that are subject to the relevant regulations all take quite different approaches to demonstrate due diligence which can result in different levels of compliance and business practice.

This Code of Practice and auditing programme aims to address variations in the global market and ensure that DFS is setting high standards and expectations for our customer's protection.

Our approach is by the identification of critical control points, supported by good process control, and use of clearly defined procedures to demonstrate due diligence systems that should enable ongoing good business practice, continuous improvement, and compliance.

All DFS suppliers and potential suppliers of finished articles and components will be required to fully comply and complete this auditing programme once a year.

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4.0 THE DFS SUPPLIER AUDITING PROGRAMME

The supplier audit is to ensure that all DFS suppliers are compliant to relevant UK and International legislation and fit for purpose, therefore, the DFS would encourage all suppliers to maintain effective due diligence and version-controlled systems covering the following:

- a) Liability Insurances.
- b) Ethical certifications (SEDEX, SMETA).
- c) Health & Safety, machinery, PPE, and training.
- d) Regulatory Compliance.
- e) Trade descriptions, checking product measurements and components against specified technical data sheet, lay sheet, or bill of materials.
- f) Evidence of full traceability of raw materials to a finished article label.
- g) Demonstration of how the final batch number relates to materials used in production.
- h) Evidence of a physical and performance testing programme in place to monitor and measure compliance of DFS products placed on the market.
- i) Evidence of test reports to show compliance of the raw materials with all relevant UK and EU Regulations.
- j) Evidence of a Business Continuity Plan (BCP).
- k) Evidence of a Loading Policy.
- l) Evidence of a Pre-delivery/Shipment Inspection (PDI/PSI).
- m) Evidence of a Needles and Sharps Procedure.
- n) Evidence of a Recall Procedure.
- o) Evidence of a Corrective Action Plan covering identification, resolving, root cause analysis and corrective action.
- p) Product and factory quality control, Policy, Process and Procedures.

This Code of Practice is not just based on a single initial audit, a programme of annual audits must be maintained for every supplier.

It is the responsibility of the supplier to ensure that all relevant products on offer or supplied to the DFS for sale and placed on the market within the UK are fully compliant with the relevant regulations and this Code of Practice.

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5.0 NUMBER OF AUDITS

All current and potential suppliers must undergo an audit for each manufacturing site. In the case of multi-site global manufacturers, every site must be audited by an appointed DFS representative.

Once the initial audit is successfully passed, a DFS approved supplier certificate will be issued.

The certificate will be valid for a period of 12 months and is subject to the supplier successfully satisfying all requirements on an annual basis.

All new suppliers must be approved prior to any further business with DFS Trading Limited.

5.1 THE AUDIT PROCESS

- a) A non-current supplier wishing to supply DFS or approached by a DFS buyer, must take an initial audit to gain an approved supplier status.
- b) All current suppliers must take part in this auditing programme and have their audit performed around 6 months of the programme launch.
- c) DFS representative will contact the supplier or potential supplier to arrange an audit date.
- d) Once a date is confirmed, the auditor will send the Pre-Audit Questionnaire and Audit Plan, Code of Practice, and guidance documentation by email.
- e) The audit process will be one location in one day and would typically be complete in ample time in the same day.
- f) All audit evidence is required for our records, this can be either hard or electronic copies.
- g) DFS audit plan sets out the plan for the day.
- h) The auditor will perform the audit to an approved audit checklist, developed by the Group Support Centre Quality Team and assessed by DFS Senior Management.
- i) Once the audit is complete, the auditor will complete the audit documentation which will be submitted to DFS records and the supplying partner.
- j) If any non-conformities are identified, these will be classified as either major or minor. The supplier will normally have two weeks in which to resolve any non-conformities raised.
- k) Allowances may be made for delays beyond the control of the supplier e.g., testing.
- l) The auditor will require the supplier to sign the NCRs, stating that they accept the reasons for the NCRs raised.
- m) On completion of the process and once NCRs are fully closed, the final audit report and certificate will be sent to confirm the DFS approved supplier status.

Although suppliers may have a DFS approved supplier status, it remains the responsibility of the supplier, and **not** DFS, to ensure that all relevant products offered or supplied for sale on the market within the UK are fully compliant with the relevant regulations required and of this Code of Practice.

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5.2 NON-CONFORMITY REPORTS

All non-conformities must be closed out and supporting evidence in two working weeks of the non-conformity report date. Exceptions will be approved on a case-by-case basis with a justifiable reason.

These reports need to be complete for every non-conformity and returned to the auditor with supporting evidence of corrective actions.

Non-conformances found during any audit will be classed as either:

- **Major**
A lack of ability to demonstrate robust due diligence systems, control of raw materials or not being able to provide evidence of compliance to relevant regulations for the UK and Europe.
- **Minor**
Significant practices identified as being present in some form, however, where improvements are required to meet the Code of Practice specified requirements.
- **Comment for Action / Continuous Improvement**
Suggestions made by the auditor for consideration. This is not a non-conformity; however, suppliers should discuss comments with the auditor to satisfy the concern or comment raised.

5.3 AUDIT RESULTS & CORRECTIVE ACTIONS

The audit result is based on the number and severity of non-conformities. DFS will have a league table internally of all supplier results.

The result of an audit will be rated: A, B or C.

Audit Quality Rating System (Potential suppliers first audit must be at least a B-rating):
A rating – 0 Major NCs and up to 5 Minor NCs. Supplier fully satisfies the Code of Practice and continues with an annual audit.
B rating – 1 Major NC and up to 5 Minor NCs. NCRs must be fully closed with evidence supplied in the specified time frame to satisfy the Code of Practice. Suppliers must receive an A-rated audit the following year. Failure to do so, will result in an unannounced audit 3 months after.
C rating – 2 Major NCs. Not acceptable and an unannounced audit will be performed in 6 months where an A-rating must be achieved. All C-rating audits will be a major cause for concern and DFS Senior Management will be advised of the situation.
Note , if an existing supplier receives a C rating and fails to achieve an A-rating the following month, senior management may wish to act. Note , if a new supplier does not reach a B-rating, reapplying will be no sooner than 6 months and an A-rating must be achieved. Note , comments for action / continuous improvement suggestion may be escalated to a Minor NC if not justified and agreed on the next audit.

Records of all information required to close NCRs must be recorded and all related evidence included.

ALL non-conformities **MUST** be closed within the timescale agreed with DFS (no longer than 2 working weeks).

Failure to close out within the timescale will result in C rating and the supplier status will not be approved. Existing suppliers failing to meet the requirements will be reported to the Senior Management Team.

All audits and re-audits must be satisfied to remain a valued DFS supplier.

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6.0 DFS AUDIT CRITERIA

The DFS Code of Practice is applicable to all suppliers of consumer products, the only difference will be test reports and testing requirements, detailed in this Code of Practice and on the auditor checklists.

Each section of the audit criteria will require evidence of compliance to this Code of Practice.

6.1 LIABILITY INSURANCE

All suppliers and potential suppliers must have an in-date Liability Insurance certificate. This will be required to view and a copy for evidence annually.

Public liability insurance protects your business against compensation claims and their legal costs if you cause injury (including death) to a third party or damage to their property. Public liability insurance covers you on your premises and working off-site.

6.2 ETHICAL AUDIT CERTIFICATION

All suppliers of DFS are expected to be ethical and responsible, therefore, a minimum expectation of a 3rd party audit from a recognised service provider is required on an annual basis. The 3rd party final report will be required as evidence.

DFS specific requirement is a SMETA 4 pillar audit by a SEDEX representative. Where audits are not existing, a 2 pillar audit will be initially accepted, followed by a 4 pillar on the expiration date.

6.3 HEALTH AND SAFETY, MACHINERY, PERSONAL PROTECTIVE EQUIPMENT AND TRAINING

a) Health and Safety

Health and safety is a keen interest of DFS for all suppliers. There are key areas that the auditor will look for including:

1. Fire risk assessments performed annually by a 3rd party.
2. Firefighting equipment regularly checked and updated.
3. A fire evacuation procedure is documented and reviewed.
4. Evidence of fire drills.
5. Work areas are clean and tidy.
6. Fire escapes are not obstructed.
7. Products are stored off the floor.
8. First Aiders and communication of who these are should be visible for all to see.
9. Accident and emergency records documented.
10. Chemical storage and documented record keeping.
11. Needles and sharp tool storage and documented record keeping.

b) Machinery

The machinery used to produce DFS products must be fit for purpose and danger assessed, therefore, the expectation is that machinery is serviced and calibrated periodically. Evidence of this will be required for the auditor to view and receive a copy of.

c) PPE (Personal Protective Equipment)

DFS expect suppliers to provide the correct PPE and safety process for all their employees. It is vital to perform a risk assessment of the work area and job duty to provide the correct PPE.

Example 1 – Woodmill – Hearing and Eye Protection.

Example 2 – Cut and Sew – Correct posture, seating and lighting.

Example 3 – Delivery areas – High Visible Garments and safety footwear.

Example 4 – Spraying booths – Overalls, face mask, eye and hand protection.

d) Training

The auditor will be looking for evidence and records of training for new employees and a continuous training plan. It is expected that employees operating specialist machinery are trained and monitored accordingly.

Employees who operate Heavy Goods Vehicles (HGV) or Forklift Trucks (FLT) are expected to have their records and expiry dates on company records.

6.4 REGULATORY COMPLIANCE

DFS is classed as the first importer for all overseas components and finished articles coming into the UK and is therefore responsible for proving and ensuring that all products are compliant to all relevant UK and European Regulations, such as:

a) Furniture and furnishings (Fire Safety) Regulations

By UK law and parliamentary bodies, DFS is required to ensure all products manufactured and supplied in the UK and overseas for sale via our retail outlets, are fully compliant to this regulation.

This regulation is for the UK only and covers the testing and labelling of domestic furniture. The main schedules cover the following:

Schedule 1 – The testing requirements of slab, crumb and latex foam

Schedule 2 – The testing requirements of non-foam

Schedule 3 – The testing requirements of interliners

Schedule 4 – Cigarette testing requirements of covers

Schedule 5 – Match testing requirements of covers

Schedule 6 – Display labelling

Schedule 7 – Permanent labelling

Testing and labelling guidance to be found in the Appendices towards the end of the document.

b) UK and EU REACH Regulations

REACH is a UK and EU Regulation; therefore, all suppliers must be compliant with this regulation. This is a chemical regulation to ensure the registration of harmful substances and that they are not present in products and restricted chemicals are in their correct approved tolerances.

There are two main lists under this regulation, and they are Annex VII and the Substances of Very High Concern (SVHC) lists. All components of DFS products must be proven and declared that the products supplied meet the regulations.

Further details on this can be found at the Health & Safety executive website:

<https://www.hse.gov.uk/reach/>

DFS expect suppliers to understand our responsibilities to UK and EU REACH, and that DFS require annual declarations from all supplying partners test report evidence as or when requested by DFS.

As part of DFS due diligence, all supplier products will be tested to ensure our responsibilities as a responsible importer and retailer are satisfied.

DFS will provide suppliers with our formal declarations which meet our stakeholder's expectations, and guidance can be found in the Appendices towards the end of the document.

c) GB and EU Biocides Regulations (BPR)

The Biocides Product Regulations is a United Kingdom and European regulation. A Biocidal product is either:

1. A product that is inheritably able to what it is designed to do, for example, 'Kills Bacteria'.
2. A product that has an added substance to deliver what it's supposed to do, for example, 'kills 99.9% of all Bacteria'.

If a product has an added substance, DFS require the following information:

1. Is it an approved Biocide, stated on the Biocide list
2. DFS require the technical data sheets for the Biocide before product is approved for our retail outlets.

Further details on this can be found at the Health & Safety executive website:

<http://www.hse.gov.uk/biocides/index.htm>

DFS expect suppliers to have an understanding of our responsibilities to Biocides and that DFS require annual declarations from all supplying partners with test report evidence as or when requested by DFS.

Where active biocides are used as part of a product selling point, the technical data sheet (TDS) and active chemicals must be supplied as part of the product technical files supplied to DFS.

As part of DFS due diligence, all supplier products will be tested by DFS to ensure our responsibilities as a responsible importer and retailer are satisfied.

DFS will provide all suppliers with our formal declarations which meet our stakeholder's expectations.

d) UK and EU Timber Regulations

The EU and UK Timber Regulations (EUTR and UKTR) is a European and United Kingdom Regulation to prevent illegal logging and to ensure all European users of wood are sourcing wood from legal and certified forests.

To be compliant to this regulation, traders and operators need to perform a chain of custody scheme which is a paper trail to show that their timber is certified and comes from a certified forest.

Operators: Businesses or person(s) purchasing timber for resale, usually purchasing in bulk.

Traders: Businesses or person(s) purchasing wood to for resale in smaller quantities and businesses or person(s) using timber for manufacture of a product like furniture.

Agents: Businesses who just source and make the relevant introductions and possibly facilitate movement without it entering the country where they are based. It is important for a non-UK or EU Agent to be identified as they are not the importer and therefore, have no responsibility to be compliant.

A DFS requirement for supplying partners is to have a chain of custody scheme with:

- FSC – the Forestry Stewardship Council

DFS specifies that all manufacturing partners actively converting and using timber, must be FSC certified. Supplying partners purchasing converted timber or assembled frames, must be able to provide the FSC certification and full chain of custody from their supply chain.

All FSC certificates must be in date and a list of suppliers that can be presented as evidence to the auditor prior or on the audit day.

e) UK General Product Safety Regulations (GPSR) EU General Product Safety Directive (GPSD)

This is a UK regulation and EU Directive which covers the general safety of consumer products. The regulation states that:

"No producer shall [supply or] place a [consumer] product on the market unless the product is a safe product" and provides broad enforcement powers."

In the furniture industry, chemical and flammability testing is mandatory to ensure the domestic products meet the relevant regulations.

Structural testing is not mandatory for domestic furniture, however, without testing against a current pre-existing standard by a UKAS or similar accredited testing house, it would be very difficult to stand up in a court of law and verbally convince a judge and jury that a product is safe and 'fit for purpose'.

Physical and performance testing on components, and finished articles in the domestic furniture market is also evidence that quality components are used, and the product is manufactured well. The more testing and quality procedures evidence a business has, is also useful for premium pricing and marketing purposes.

Product risk assessments are very relevant to these regulations to show that a company has assessed the product for potential risk of harm, injury and assessing both accidental and deliberate acts that may have an impact to human and product safety.

DFS require that all products supplied, and for sale in the retail outlets are proven fit for purpose with test report evidence from a recognised 3rd party testing laboratory.

For example: UKAS or similar accredited laboratories, accredited to ISO17025.

In the Appendices towards the end of this document, there is guidance on physical and performance testing standards for all types of products under the DFS product portfolio. In addition, there also guidance of chemical testing by materials used and assistance for DFS suppliers to have available with Technical Service Providers.

f) Textile Products (Labelling and Fibre Composition) Regulations

This is a United Kingdom and European Regulation to ensure that manufacturers and suppliers are labelling textiles and apparel correctly with the correct fibre names, content, and construction.

The Regulation requires textile products which are made available on the market, to be labelled, marked, or accompanied with commercial documents, in compliance with the Regulation.

Products that are treated as textile products are:

- a. Products containing at least 80% by weight of textile fibres.
- b. Furniture, umbrella, and sunshade coverings containing at least 80% by weight of textile fibres.
- c. The textile components (provided such textile components constitute at least 80% by weight of such upper layers or coverings) of:
 1. The upper layer of multi-layer floor coverings.
 2. Mattress coverings.
 3. Coverings of camping goods.
- d. Products incorporating textile components, and which form an integral part of the product, where the compositions should be specified.

DFS expect all suppliers to meet the labelling requirements of textile products which include upholstered furniture and mattresses. All products must be labelled with the correct textile composition on the products supplied.

For further details please visit <https://www.gov.uk>

g) Machinery Directive 2006/42/EC, CE Marking and UKCA Marking

This is a Directive for the safe inclusion of motorised parts in electrically actuated motorized domestic furniture falls within the scope of this Directive, meaning electrical furniture must now carry both the CE mark for the EU market and UKCA mark for the UK market.

To comply with the requirements of the Machinery Directive, the manufacturer must prepare the TCF (Technical Construction file) according to ANNEX VII of 2006/42/EC.

This mainly includes the following files:

1. A construction file including a general description of the machinery.
2. The overall drawing of the machinery and drawings of the control circuits, as well as the pertinent descriptions and explanations necessary for understanding the operation of the machinery.
3. Full detailed drawings, accompanied by any calculation notes, test results, certificates, etc., required to check the conformity of the machinery with the essential health and safety requirements.
4. The documentation on risk assessment demonstrating the procedure followed the standards and other technical specifications used, indicating the essential health and safety requirements covered by these standards.
5. Any technical report giving the results of the tests carried out either by the manufacturer or by a notified body, including but not limited to: **RoHS, EMC and LVD**.
6. A copy of the instructions for the machinery.
7. A copy of the UK and EC declaration of conformity, in addition, DFS declaration must also be complete annually.
8. For series manufacture, the internal measures that will be implemented to ensure that the machinery remains in conformity with the provisions of this Directive.

Furniture manufacturers have traditionally only considered the scope of the General Product Safety Directive (GPSD), which does not require CE marking and UKCA marking for the United Kingdom.

With the inclusion of furniture with an electrical function in the new guidance for the Machinery Directive, this form of furniture does now require CE marking and UKCA marking for the UK. Stakeholders should be aware that furniture without an electrical function is still exempt from CE marking and UKCA marking for the United Kingdom.

DFS expect suppliers to produce the documented evidence of CE marking and UKCA marking for the United Kingdom that meets this Directive.

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6.5 TRADE DESCRIPTIONS, CHECKING PRODUCT MEASUREMENTS AND COMPONENTS AGAINST SPECIFIED TECHNICAL DATA SHEETS, LAY SHEET OR BILL OF MATERIALS (BOMs)

In this section of the audit, the auditor will request the approved specification of a minimum of 1 products. The 1 product will be checked against the agreed specification for components and measurements to ensure that they are as specified.

It is important that what DFS advertise and sell via retail and online point of sale is exactly what the supplier delivers.

If suppliers change components of finished articles or supply product not specified and approved by DFS, the supplier will be held financially accountable.

If suppliers provide a product not to approved specification and DFS are found to be supplying non-compliant products to relevant UK and European Regulations. The supplier will immediately be investigated by DFS and would hold the supplier financially accountable which could result in the business relationship being terminated.

6.6 EVIDENCE OF FULL TRACEABILITY OF RAW MATERIALS TO A FINISHED ARTICLE LABEL

The supplier or potential supplier must demonstrate full control of the upholstery materials used to construct the finished article and to ensure that no raw materials are used that do not meet requirements of the relevant regulations.

If supplying to UK and non-UK markets, the supplier must demonstrate sufficient control of raw materials to ensure that non-UK compliant materials cannot enter production lines of UK market products.

DFS class the following as Critical Control Points:

- a) How are suppliers of finished articles or components classed as approved, how are suppliers or sub contactors audited, and how is quality of suppliers monitored and managed?
- b) Control of incoming goods and storage.
- c) Checks in place to ensure raw materials have batch identification.
- d) Evidence of a system of allocation to production (i.e., first in, first out).
- e) Quarantine area for faulty materials/ non-compliant materials.

The supplier must demonstrate that the batches of materials used throughout the production process are traceable, from the goods in stage to the finished product, and delivery to DFS.

DFS class the following as Critical Control Points for this requirement:

- 1. Evidence of record of batch number of raw materials being recorded from goods inwards into the production process.
- 2. High risk areas such as pattern cutting and sorting.
- 3. Demonstration of records to show that batches of materials can be traced to a final batch number on the finished product.
- 4. How sub contracted parts are controlled and allocated to orders made.

6.7 DEMONSTRATION OF HOW THE FINAL BATCH NUMBER RELATES TO ALL MATERIALS USED IN PRODUCTION

The supplier must be able to demonstrate that the final batch number given on the permanent label of the finished articles can be traced back to the materials used in production.

DFS class the following as Critical Control Points for this requirement:

- a. Documentation to show the final batch number on the product and the batches of materials used for that final finished product.
- b. Controlled batch sizes to reduce the level of products to be recalled should there ever be a full product recall.

6.8 EVIDENCE OF A PHYSICAL AND PERFORMANCE TESTING PROGRAMME IN PLACE TO MONITOR COMPLIANCE OF DFS PRODUCTS PLACED ON THE MARKET

The supplier must have a documented programme of performance testing of finished article or components based upon volume of material or by batch number to show that the component or finished articles have been tested in accordance with agreed due diligence with DFS.

As the relevant regulations do not provide any requirements for test frequency, it is the responsibility of DFS to assess the frequency of testing when considering the number of units that are produced and the month output.

DFS consider it reasonable that in low volume production cover material test certificates should be no older than 12 months of the date of manufacture or one report per batch of interior materials used.

Flammability, interior, cover and finished article testing requirements are as specified in the DFS Testing Specification.

Reference in some British Standards for composite testing, there a testing frequency. DFS domestic mattresses must meet all requirements of:

- BS 7177:2008+A1:2011 - Specification for resistance to ignition of mattresses, mattress pads, divans and bed bases.

Testing mattress and divan bases has a test frequency requirement of 1 in every 2400 units produced or once per month the lower end is up to 400 units produced or once every 6 months.

This requirement needs to be in agreement with the DFS Quality and Compliance team, and is based on material usage per annum.

6.9 EVIDENCE OF TEST REPORTS TO SHOW COMPLIANCE OF RAW MATERIALS WITH ALL RELEVANT UK AND EUROPEAN REGULATIONS

All suppliers must provide specified test reports requested by DFS for all components and finished article composites if applicable.

Furniture and Furnishings (Fire Safety) and REACH Regulations require specific and mandatory test reports.

DFS expect all covers and fillings to have a test report every batch of material. Testing should be performed at a UKAS or similar accredited laboratory, or if tested outside the UK, a recognised testing laboratory with a similar accreditation. All laboratories should be ISO 17025 certified and accrediting bodies signatories of the ILAC.

6.10 EVIDENCE OF A BUSINESS CONTINUITY PLAN (BCP)

It is significantly important to DFS to ensure that all current and potential suppliers can fulfil increasing order demands. If there were to be a crisis of any kind, for example, a factory fire and production had to shut down, what would the process be and the impact of this to DFS.

If a supplier who produces 12,000 units a month is not in operation for two weeks, what would be done to immediately resolve the issue and forward plan decreasing waiting times? A Crisis Management Procedure should be in place for non-product related issues that would have an impact on delivering product to DFS in the agreed time frame.

A risk assessment of the impact of a crisis should be in place, this would bring up areas that could be addressed and in place if a crisis ever does happen. For example, what would the impact be in regards to recalling non-compliant foam, and how many weeks of finished articles would need recalling? It is advisable to ensure core material batch codes are at a manageable size based on financial impact of a full recall.

DFS would expect a BCP is in place, documented and version controlled.

6.11 EVIDENCE OF A LOADING POLICY

Whether finished articles are travelling 8 weeks on the water from overseas, or from a local UK supplier, containers and heavy goods vehicles need to be loading in such a way that products do not get damaged in any way from factory to a DFS distribution centres (CDCs or DCs)

The loading policy should include best practice loading where the maximum amount of furniture can be loaded without damage to product or causing any health and safety risks unloading at CDC or DCs

The expected policy should include methods of packaging and protection, how specific pieces of furniture should be loaded and stacking lighter product on top of heavy product. These policies need to consider movement and the potential of damaging products. Policies should be reviewed periodically, and version controlled.

6.12 EVIDENCE OF A PRE-DELIVERY/SHIPMENT INSPECTION (PDI/PSI)

All suppliers of DFS should provide pre-shipment inspection reports including all products on the shipment and the quality checks performed before loading.

This report should also include photographic evidence of the loaders loading the containers until complete.

Other photographic evidence required in the report would include labels, packaging, and feet of at least 25 percent of the units loaded on each container.

These reports should be sent to the relevant Quality Manager/ or other and keep for at least 5 years.

6.13 EVIDENCE OF A NEEDLE AND SHARPS POLICY

Suppliers must demonstrate control of processes that could affect the safety of DFS components and finished articles, and control of tools used during manufacture that could pose a safety risk if found in the product - such as sharp objects, broken needles, and loose staples.

DFS would expect this procedure to be documented and include reference to the following:

- a. How needles are stored and distributed.
- b. How broken needles are retained and recorded.
- c. How knives, sharps and staples are accounted for and stored before and after a shift.
- d. Are there any mental detection devices on site, and how often are they used and calibrated.
- e. Who checks and monitors colleagues, and whether own tooling can enter the business?

This process should include record keeping and detailed information.

DFS Trading Limited (DFS)

6.14 EVIDENCE OF A PRODUCT RECALL PROCEDURE

In the event DFS find a non-compliant product and a full product recall is required, DFS requires a Recall Procedure from all suppliers which cover the following key areas:

- a) Internal contact list and communication strategy.
- b) Who is responsible for decision making in the event of product crisis and recall.
- c) Actions which may be taken depending on the issue.
- d) Verification of the product issue by batch re-testing.
- e) If the issue is related to a batch, whether this can be identified by a unique code or identity number.
- f) Traceability system relating to the finished product batch number and to raw materials used.
- g) Sales data – products sold and duration of time on sale.
- h) Guidance on when to notify enforcement bodies where relevant.
- i) Identification and quarantine of any affected unsold materials or products in stock.
- j) Quantifying the success of a recall and when further action may be required.
- k) Quarantine of affected stock or raw materials returned as part of a recall to ensure this does not re-enter the supply chain.
- l) Review of the process itself to ensure it remains relevant and up to date

DFS Trading Limited (DFS)

6.15 EVIDENCE OF A CORRECTIVE ACTION PLAN, INCLUDING IDENTIFICATION, RESOLVING, ROOT CAUSE ANALYSIS AND CORRECTIVE ACTIONS

If DFS find a product issue or an issue is brought to our attention such as failure in use or quality related failure, it must be fully investigated how and why this happened and to determine if any further action is needed such as a product recall or corrective action.

Suppliers will be expected to work with DFS to identify what needs to take place to ensure that this does not happen again.

A corrective action procedure should be in place to set out the action plans and who is responsible to deliver the action plan at every stage.

DFS expect that a corrective action procedure would cover the following:

- a) Contact list and communication plan including those authorised or responsible for the corrective action, including when stakeholders are advised.
- b) Full details of the issue raised.
- c) Risk assessment of the product, analysis, and conclusions overview.
- d) Sufficient product traceability and identification of affected units.
- e) Action planning of how to correct or mitigate the issue.
- f) Plan detailing steps in place to ensure the issue does not occur again.
- g) Controlled review of the corrective action plan to ensure it remains relevant and up to date.

6.16 PRODUCT AND FACTORY QUALITY CONTROL, POLICY, PROCESS AND PROCEDURE

Due to the scope of this section in regards to product type, supplying partner type and geographical location, it is not possible to specify exact requirements.

The auditor and responsible DFS representative will assess specifics and discuss any major, minor or comments for action based around the following headings.

Note: In most cases, evidence will be required, however, in some cases visible assessments will be satisfactory.

1. On-board, assessment and approval process of suppliers and sub-contractors.
2. Quality control process for components coming into the business, and how these are prepared for allocation to production.
3. Procedure or Policy for the attachment and inclusion of loose components. For example, FEET, ASSEMBLY INSTRUCTIONS (AIs), FIXINGS, TOOLS and OTHERS ALIKE
4. How are product improvements made in the factory? New signing and posters around the factory, manuals of models, frequency of product colleague training on products?
5. Controls on temperature and moisture content for leather, timber and other materials.
6. Where are finished articles checked, and are they signed off by senior quality controllers? Where is the checking area, and is there a record of products not fit for delivery?
7. Is there a list of critical control point system throughout production? How is quality rewarded? For example, is there a consequences system to accompany piece work systems?
8. How are new model introduced, and what is the process introducing new designs?
9. Where loose materials like fibre or feather / down is used, how is this controlled to ensure inconsistencies are low. How are mass, area and densities formulated and approved?
10. How are product risk assessments performed at Research and Development? Are they assessed in regards to accidental and deliberate harm, and is there a process of advisories for consumer awareness to potential product risk?
11. How DFS service parts are monitored, and used for continuous improvements?
12. How is DFS Quality Reports (NRFT, LATENT and NPS), and portals used to digest information and improve where required?

Note:

The auditor or DFS representative will discuss and provide reports on all requirements, that will be agreed to closed in the agreed timeframe based on the severity of the finding. All findings must not be apparent on the following years audit.

DFS Trading Limited (DFS)

7.0 OBLIGATIONS

By participating in DFS auditing programme, all companies are committed to ensure the sale or supply of safe, legally compliant, and fit for purpose products in accordance with the relevant regulations and DFS code of practice.

Any DFS manufacturer and supplier of finished articles and components are required to take part in the supplier auditing programme.

As a DFS supplier or potential supplier, DFS Trading Limited will work with suppliers to achieve the standards required within the remit of the code of practice.

Failure to participate in the supplier audits on an annual basis could result in the matter being brought to the attention of DFS Senior Management who may decide to take further action regarding the business partnership.

DFS Trading Limited (DFS)

8.0 TERMS AND CONDITIONS OF THE AUDITING PROGRAMME

All DFS current and potential suppliers are obliged to conform to the code of practice and audit requirements as defined in the most current versions of the following documentation:

- Code of Practice.
- Pre-Audit Questionnaire and Audit Plan.
- Non-conformity Report.
- Final Report.
- Audit Guidance Document.

All audits will be undertaken by an appointed representative of DFS Trading Limited.

9.0 COMPLAINT AND APPEAL PROCESS

Issues raised by individual suppliers will be dealt with initially by the auditor. If the issue cannot be resolved, then the company shall formally log the complaint or appeal with the Senior Quality and Compliance Manager on the details below within one working week of receiving the final audit report.

All disputes and appeals received by DFS Trading Limited will be acknowledged, investigated, and actioned by the Senior Quality and Compliance Manager. To appeal the outcome of your supplier audit, qualifying evidence must be received within one working week for DFS Trading Limited to review your appeal.

The decision of DFS Trading Limited will remain in force pending the outcome of the appeal, which the supplier and DFS Trading Limited each agree shall be final.

At the end of the investigation, DFS Trading Limited will advise the outcome and the final communication will be a summary of the investigation, conclusion and any actions taken as a result.

Disputes and appeals shall be sent in writing to the Commercial Director at the following address: -

DFS Trading Limited

DFS Head Office (Group Support Centre)
1 Rockingham Way
Redhouse Interchange
Adwick-Le-Street
Doncaster
DN6 7NA

Telephone: +44 (0) 1302 573 200

Senior Quality and Compliance Manager: Robin Scott

Email: Robin.scott@dfs.co.uk

Commercial Director: Arron Burton

Email: Arron.burton@dfs.co.uk

DFS Trading Limited (DFS)

10.0 DECLARATION:

As a valued supplying partner to DFS Trading Limited, we adhere and support the Code of Practice, and understand that failure to meet the relevant requirements applicable to our business or product offering, we would be held accountable and financially accountable where applicable. We also understand and will operate in accordance to DFS Trading Limited policies, processes, and procedures in the Appendices below.

Supplying Partner:

Name:

Position:

Date:

Signature:

Company stamp (Asia):

On behalf of DFS Trading Limited:

Quality Manager/Or other:

Date Received:

Signature:

On behalf of DFS Trading Limited:

Senior Quality Manage/Or other:

Sign off Date:

Signature:

APPENDICES:

APPENDIX 1 - ANTI-CORRUPTION AND BRIBERY POLICY

1. Policy Statement

1.1 Our policy is to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption. We expect all our employees, suppliers and partners to comply with this policy and our Code of Conduct.

1.2 We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

2. Purpose

2.1 The purpose of this policy is to:

(a) Set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on bribery and corruption; and

(b) Provide information and guidance to those working for and on our behalf on how to recognise and deal with bribery and corruption issues.

2.2 It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery, we can face an unlimited fine, and damage to our reputation. We therefore take our legal responsibilities very seriously.

2.3 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

3. Who must comply with this policy?

This policy applies to all persons working for any Group Company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

4. What are bribery and corruption?

4.1 Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

4.2 An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

4.3 A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

4.4 Corruption is the abuse of entrusted power or position for private gain.

Examples:

Receiving a bribe: A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official: You arrange for the business to pay an additional “facilitation” payment to a foreign official to speed up an administrative process, such as clearing our goods through customs.

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

5. What you must not do

It is not acceptable for you (or someone on your behalf) to:

(a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

(b) Give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;

(c) Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;

(d) Accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.

(e) Offer or accept a gift to or from government officials or representatives, or politicians or political parties;

(f) Threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or

(g) Engage in any other activity that might lead to a breach of this policy.

6. Facilitation payments and kickbacks

6.1 We do not make, and will not accept, facilitation payments or “kickbacks” of any kind.

6.2 Facilitation **payments**, also known as “back-handers” or “grease payments”, are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK, but are common in some other jurisdictions in which we operate.

6.3 Kickbacks are typically payments made in return for a business favour or advantage.

6.4 You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager.

7. Gifts, hospitality and expenses

7.1 This policy allows reasonable and appropriate hospitality, entertainment or gifts given to or received from third parties, for the purposes of:

- establishing or maintaining good business relationships;
- improving or maintaining our image or reputation; or
- marketing or presenting our products and/or services effectively.
- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is given in our name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas; and
- in the case of gift, it is given openly, not secretly.

7.3 Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

7.4 Reimbursing a third party’s expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

7.5 We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

8. Donations

8.1 We do not make contributions to political parties.

8.2 We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Chief People Officer.

9. Record-keeping

9.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

9.2 Significant gifts or hospitality, should not be accepted, all other gifts and hospitality should be approved by your line management and you must notify Hollie Heaney in Finance of all hospitality or gifts given or received, so it can be added to the register. If you have any queries about whether or not the acceptance of any gifts or hospitality is appropriate, please check with the Company Secretary.

9.3 You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

9.4 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept “off-book” to facilitate or conceal improper payments.

10. Your responsibilities

10.1 You must ensure that you read, understand and comply with this policy.

10.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

10.3 You must notify your manager, or contact the Whistleblowing helpline as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further “red flags” that may indicate bribery or corruption are set out in clause 16.

11. How to raise a concern

11.1 You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.

11.2 If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager alternatively you may report your concerns as soon as possible by contacting the Whistleblowing hotline.

11.3 If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager, or the Director of Financial Services Audit and Risk

12. Protection

12.1 Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

12.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should contact the People team immediately.

13. Training and communication

Our zero-tolerance approach to bribery and corruption is to be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter. On line training on anti-bribery and corruption will be accessible to all employees. Senior employees who are required to undertake the training will be notified individually.

14. Breaches of this policy

14.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

14.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

15. Who is responsible for the policy?

15.1 The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it.

15.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

15.3 This policy has been approved by the board of directors of DFS Furniture PLC. This policy does not form part of any employee's contract of employment and we may amend it at any time. This policy will be reviewed at least annually.

16. Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to your line manager or by contacting the Whistleblowing hotline, if you are uncertain about whether something is a potential risk, you should always check if:

- (a) you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with foreign government officials;
- (c) a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- (d) a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (e) a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (f) a third party requests an unexpected additional fee or commission to “facilitate” a service;
- (g) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (h) a third-party request that a payment is made to “overlook” potential legal violations;
- (i) a third-party request that you provide employment or some other advantage to a friend or relative;
- (j) you receive an invoice from a third party that appears to be non-standard or customised;
- (k) a third party insists on the use of side letters or refuses to put terms agreed in writing;
- (l) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (m) a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- (n) you are offered an unusually generous gift or offered lavish hospitality by a third party.

17. Audit

In order to ensure that we have ‘adequate procedures’ in place to prevent bribery we will carry out biennial Anti-bribery and corruption audits which will include relationships with our key third party suppliers. The Internal Audit function with support, where necessary from the Group General Counsel, will review supplier contracts and the decision-making processes for procuring Goods for Resale and Goods not for Resale from individual suppliers, including where applicable any tender processes. Compliance with the Group Delegations of Authority will also be reviewed.

APPENDIX 2 - WHISTLEBLOWING POLICY

About this policy

We are committed to conducting our business with honesty and integrity, and we expect all colleagues to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- To encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide colleagues with guidance as to how to raise those concerns.
- To reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- This policy applies to any person working for any Group company in any capacity, including all employees, officers, directors, consultants, contractors, volunteers, interns, apprentices, casual workers, seconded workers and agency workers.

This policy has been approved by the Board of directors of DFS Furniture PLC. It does not form part of any employee's contract of employment and we may amend it at any time.

Personnel responsible for the policy

The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The People Team has day-to-day operational responsibility for this policy, and must ensure that all managers and other colleagues who may deal with concerns or investigations under this policy receive regular and appropriate training.

All colleagues are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Colleagues are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the People Director.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery under our Anti-corruption and Bribery Policy;
- facilitating tax evasion;
- financial fraud or mismanagement;
- breach of our internal policies and procedures, including our Code of Conduct;
- conduct likely to damage our brand, reputation or financial wellbeing;
- concerns that anyone is advising customers about furniture or optional services incorrectly, including deliberately misleading customers or not providing full explanations;
- unauthorised disclosure of confidential information;
- negligence;
- the deliberate concealment of any of the above matters.

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from either your line manager, or if this is not appropriate your HR Business Partner.

Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the People Team.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should, in the first instance, contact one of the following:

The Group Whistleblowing hotline; or

Your HR Business Partner.

If you are not satisfied with the response you can escalate your concern to the Whistleblowing Officer: Paul Scanlon, Group Financial Services, Risk and Audit Director.

Contact details are set out at the end of this policy.

Whistleblowing concerns relating to the CEO will be managed by the Group Company Secretary on behalf of the Chairman of the Board.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every reasonable effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 0 and appropriate measures can then be taken to seek to preserve confidentiality. If you are in any doubt you can seek advice from our confidential hotline as part of our Employee Assistance Programme or Protect (formerly known as Public Concern at Work), the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action, which could result in dismissal.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 0. Alternatively you may contact Liz McDonald, Group General Counsel and Company Secretary. Contact details are set out at the end of this policy.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our colleagues, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 0 for guidance.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support colleagues who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager, or if this is not appropriate your HR Business Partner, immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action, which could result in your dismissal. In some cases the whistleblower could have a right to sue you personally for compensation in an Employment Tribunal.

Contacts

Whistleblowing hotline	Tel: 0333 212 3535
Employee Assistance Programme	Tel (freephone): 0808 168 2143 Outside the UK: +44 1452 673 138
Whistleblowing Officer: Group Financial Services, Risk and Audit Director	Maxine Grainger Email: Maxine.Grainger@sofology.co.uk Tel: 07788136853
Group General Counsel & Company Secretary	Name: Liz McDonald Email: liz.mcdonald@dfs.co.uk Tel: 07849083971
Protect (Independent whistleblowing charity formerly known as Public Concern at Work)	Helpline: (020) 3117 2520 E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk

APPENDIX 3 - EQUAL OPPORTUNITIES POLICY

DFS is committed to the principle of equal opportunity in employment.

Accordingly, we have designed our policies for recruitment, selection, training and promotion to ensure that no job applicant or employee receives less favourable treatment on the grounds of race, colour, nationality, ethnic or national origin, age, disability, religion or belief, sex, marital status sexual orientation, gender reassignment, pregnancy or maternity. Our overall aim is to ensure that individuals are selected, promoted and generally treated on the basis of their relevant aptitude, skills and abilities.

It is fully acknowledged that management has the responsibility for ensuring the implementation of this policy by:

- Not discriminating in the course of employment against existing employees or applicants.
- Not inducing or seeking to induce others to practice discrimination.
- Advising employees that any discrimination on their part may lead to disciplinary action.

We also believe that employees have a responsibility to assist in the achievement of our aims by:

- Not discriminating in the course of employment against fellow employees, customers, suppliers or members of the public with whom they come into contact.
- Not inducing or attempting to induce others to practice discrimination.
- Reporting any discriminatory action to the Human Resources Director.

Any employee who feels he or she is a victim of discrimination may raise the issue through the Company's Grievance Procedure.

If any evidence comes to light that an employee or a member of the management team has acted in breach of this policy then they may be subject to disciplinary action under the Company's Disciplinary Procedure.

APPENDIX 4 - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Purpose

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 ("the MSA") and sets out the steps that DFS Furniture PLC ("The Group") has taken to continue our work to assess the risk of modern slavery occurring in our business and to consider further what steps can be taken and procedures implemented to mitigate the risk of modern slavery occurring in our supply chain.

Commitment

We are committed to improving our practices to combat slavery and human trafficking. The Group does not tolerate any form of slavery, forced labour or human trafficking, whether within our own business or within our wider Supply Chain, here in the UK or overseas. We will take steps to assess the risk of slavery, forced labour and human trafficking take place in our supply chain and we expect our supplier and business partners to take their own pro-active steps to ensure compliance with the MSA within their own businesses and supply chains.

Our Business

DFS is the UK's leading retailer of upholstered furniture, we design, manufacture, sell, deliver and install an extensive range of upholstered and other furniture products for our customers under our DFS, Sofology and Dwell brands. Almost all of our upholstered products are handmade to order, many of them in our three DFS upholstery factories and two wood mills right here in the UK. The business operates a retail network of upholstered furniture stores in the United Kingdom and Europe, together with an online channel. These have been established and developed gradually through nearly 50 years of operating history. We employ nearly 4,000 people within DFS across our group support centre, manufacturing, fleet and distribution and retail sites. Overall the DFS Group employees over 5500 people in the UK, the ROI, the Netherlands and Spain. For the financial year ending 31st July 2018 the Group announced annual turnover of £870.5m and pre-tax profits of £25.8m.

Our Supply Chains

The DFS Group has long term relationships with its suppliers of both finished goods and raw materials both in the UK and overseas. With regards to upholstered products, and aside from our own UK-based internal manufacturing operations, the vast majority of the DFS Group externally sourced upholstered products come from our top five manufacturing partners in continental Europe and Asia. We have long standing relationships with these highly regarded suppliers and senior experts of the buying and merchandising teams visit the suppliers on a regular basis.

- DFS, Sofology and Dwell also sell an extended range of furniture, including bedroom, dining room furniture and accessories which we source from a small number of trusted wholesalers.
- Raw materials for the use in internal manufacturing of upholstered furniture including foam, fabric and wood are sourced directly from our suppliers.
- Our distribution is primarily in-house managed and operated. We directly employ delivery drivers, crew and warehouse operatives who work out of our own UK based distribution centres and warehouses.
- Our shipping is outsourced to a small number of highly regarded multinational shipping companies.
- Our goods not for re-sale are procured through a formal tender process with the assistance of our procurement advisors.

Our policies for slavery and human trafficking

DFS takes seriously any allegations that human rights are not being respected within the business or the supply chain. We strive to act with integrity at all times and there are several internal policies already in place which help safeguard against human rights infringements. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

The DFS Board of Directors has overall responsibility for corporate governance, including any antislavery initiatives. We have a Governance Committee made up of our Senior Leadership team, General Counsel and Company Secretary and other senior managers which is chaired by the Chief People Officer, the Governance Committee reports regularly to the Board on the management of risks.

We acknowledge there is a risk of exposure to modern slavery in our supply chain. We have a number of external suppliers who supply DFS with both upholstered and non-upholstered furniture, raw materials and a small number of home accessories.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

We expect all our employees, suppliers, customers and business partners, the general public and any relevant third party to raise any concerns or suspicions they have about any of our procurement processes in complete confidence.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of requiring of suppliers to confirm that they:

- Sign up to our Anti-Slavery and Human Trafficking Policy;
- Accept our standards and our right to audit their factories to ensure compliance; and
- Review their own supply chains to ensure that they comply with the with Modern Slavery Act.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our key staff. In September 2018 Anti-Slavery International provided training to members of our management team and the senior members of our buying team. The intention is in the coming year that we will roll this out to a wider group of our employees and supplement it with online training for all of our employees.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Writing to all our established and new suppliers to remind them of our commitment to the Modern Slavery Act and that DFS will not tolerate any breaches of the act by suppliers.
- Auditing our supply chain with specific emphasis and regular visits, both announced and unannounced, to our largest suppliers.
- Establishing a Code of Conduct which we expect all suppliers to sign up to that recognises our standards and is audited regularly.
- Increasing standards of reporting both internally and externally by suppliers to encourage collaboration in following the guidelines of the Modern Slavery Act.
- Putting in place measures to increase the awareness of all Group employees to the risks of Modern Slavery.

APPENDIX 5 – PACKAGING LABEL SPECIFICATION

Below is a list of packaging label examples. All products in the DFS portfolio must meet the following labelling requirements, either as below or best practice examples agreed with the Group Support Centre, Quality and Compliance Department.

A label is required on every packaged product if the product meets the following criteria:

	<ul style="list-style-type: none"> • All products weighing 50KG and over
	<ul style="list-style-type: none"> • All products weighing 50KG and over • Any products that are difficult to handle safely
	<ul style="list-style-type: none"> • For all packaging types, to advise loaders only
	<ul style="list-style-type: none"> • All motion furniture, recliners, and sofa beds • All products with FEET attached. E.g., FOOTSTOOLS
	<ul style="list-style-type: none"> • Do not use open blades around DFS products • Do not open with blades to avoid product damage

APPENDIX 6 – DFS RESTRICTED SUBSTANCES GUIDANCE

DFS Group - Restricted substances guidance for UPHOLSTERY and HOME ranges at DFS												
Substance	Legislation	Requirement	Test method (or Similar)	Leathers	Natural Textiles	Synthetic Textiles	Plastics (includes coated leathers and textiles)	Rubbers	Woods	Metallic Trim	Mixtures / Combination of substances	
Azo colourants	UK&EU REACH - Annex XVII (17) - Entry 72	< 30mg/kg (see Appendix 1)	EN ISO 14362-1:2017 Textiles (natural and synthetic materials)		●	●						
	UK&EU REACH - Annex XVII (17) - Entry 43	< 30mg/kg of each amine for dyed products in direct contact with the skin (see Appendix 1)	EN ISO 14362-3:2012 Textiles for 4 - aminoazobenzene	●	●	●						
			EN ISO 17234-1:2015 Leather	●	●	●						
			EN ISO 17234-2:2011 Leather for 4 - aminoazobenzene	●	●	●						
Pentachlorophenol (PCP) and its salts and esters	UK&EU REACH - Annex XVII (17) - Entry 22	< 1000mg/kg in substances or mixtures	EN ISO 17070:2015								●	
	Persistent Organic Pollutants Regulation (EU) - (POPs)	< 1mg/kg (none detected) (see Appendix 7)	PD CEN/TR 14823:2003 (wood) - EN 717-3:1996 (wood) - EN ISO 13365-1 2020 (OPP)	●	●				●		●	
Tetrachlorophenol (TeCP)	No direct legislation, but commonly advised	5mg/kg guidance limit	EN ISO 17070:2015	●	●				●		●	
Trichlorophenol (TCP)		< 500mg/kg guidance limit	PD CEN/TR 14823:2003 (wood) - EN 717-3:1996 (wood) - EN ISO 13365-1 2020 (OPP)	●	●				●		●	
Orthophenylphenol (OPP)												
Nickel	UK&EU REACH - Annex XVII (17) - Entry 27	< 0.5µg/cm2/week for products in prolonged contact with the skin	EN 12472:2020 Wear & Corrosion							Metal		
			EN 1811:2011+A1:2015 Nickel Migration								●	●

Chromium VI	UK&EU REACH - Annex XVII(17) - Entry 47	< 3mg/kg (Annex XVII Entry 47 applies to leather coming into contact with the skin)	EN ISO 17075-1:2017 EN ISO 17075-2:2017 (reference method)	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
				Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
Phthalates	UK&EU REACH - Annex XVII(17) - Entries 51 and 52 (see also REACH Candidate List)	< 0.1% sum of DEHP, DBP, BBP and DIBP < 0.1% sum of DIDP, DINP, DNOP (products intended to be mouthed) See Appendix 2a	EN ISO TS 16181:2011 / EN ISO 14389:2014 / CPSC-CH-C1001-09.4 (2018)	Lths			●		Wood	Metal	Mix
	UK&EU REACH - Annex XVII(17) - Entry 72	< 0.1% sum of the 5 phthalates listed in Appendix 2b or in other entries of REACH Annex XVII									
	UK&EU RoHS	< 0.1% of DBP, DEHP, BBP and DIBP									
Total cadmium	UK&EU REACH - Annex XVII(17) - Entry 23	< 100mg/kg (plastics/rubbers)	EN 1122:2001 - EN 17072-2:2019 - EN 16711-1:2015	Lths			●	●	Wood	Metal	Mix
		< 100mg/kg (metal parts of jewellery)									
		< 1000mg/kg (paint)									
Total lead	UK&EU REACH - Annex XVII(17) - Entry 63	< 0.05% Metal parts of jewellery	SOP CAT-030 - (CPSC-CH-E1001-08.2 for metal items) - SOP CAT-029 - (CPSC-CH-E1002-08.2 for non-metal items) - SOP CAT-028 - (CPSC-CH-E1003-09.1 for surface coatings)	Lths	●	●	●	●	Wood	Metal	●
		≤ 0.05% in accessible parts that may be placed in the mouth by children									
Polycyclic aromatic hydrocarbons (PAHs)	UK&EU REACH - Annex XVII(17) - Entry 50	(see Appendix 3)	PD CEN/TS 16190:2013	Lths			●	●	Wood	Metal	Mix
	UK&EU REACH - Annex XVII(17) - Entry 72		EN 17132:2019 (textiles)								
Dimethylfumarate (DMF-u)	UK&EU REACH - Annex XVII(17) - Entry 61	< 0.1mg/kg of product or part of product	PD CEN ISO/TS 16186:2012 (leather)	Lths	●				Wood	Metal	Mix
			EN 17130:2019 (textiles)								
Organostannic compounds (organotin)	UK&EU REACH - Annex XVII(17) - Entry 20	< 0.1% (see Appendix 4)	PD CEN ISO/TS 16179:2012 - EN ISO 22744-1:2020 (textiles) - EN ISO 22744-2:2020 (textiles)	Lths	●	●	●	●	Wood	Metal	●

				Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
Formaldehyde	UK&EU REACH - Annex XVII(17) - Entry 72	< 75mg/kg - Textiles	EN ISO 17226-1:2019 (Leather) - EN ISO 14184-1:2011 (Textiles)		●	●					
		< 75mg/kg - Leather	Free & Hydrolysed formaldehyde - EN ISO 14184-2:2011 (Textiles) Released formaldehyde	●							
Extractable metals	UK&EU REACH - Annex XVII(17) - Entry 72	<1mg/kg of cadmium, chromium VI, arsenic and lead compounds listed in REACH Annex XVII entries 28, 29 and 30	EN 16711-2:2015 (Cd,Pb,As, total Cr)		●	●					
			EN ISO 17075-2:2017 (CrVI)	●							
Disperse dyes	UK&EU REACH - Annex XVII(17) - Entry 72	< 50mg/kg of Disperse Blue 1, Basic Red 9 and Basic Violet 3				●					
		< 75mg/kg - (Dyes listed in Appendix 5)				●					
PFOS (perfluorooctanyl sulphonates)	Persistent Organic Pollutants Regulation (EU) - (POPs)	Testing relevant when water/stain resistant treatment has been applied < 1µg/m2 for textiles and coated materials < 0.1% by mass for other materials < 10mg/kg in substances or mixtures (see Appendix 7a)	PD CEN/TS 15968:2010 - EN ISO 23702-1:2018	●	●	●					●
PFOA (perfluorooctanoic acid) and its salts	UK&EU REACH - Annex XVII(17) - Entry 68	< 25µg/kg in substances, mixtures or articles (see Appendix 7a)	PD CEN/TS 15968:2010 - EN ISO 23702-1:2018		●	●					
				●	●					●	
Nonyl phenol (NP) and nonyl phenol ethoxylates (NPE)	UK&EU REACH - Annex XVII(17) - Entry 46 (applies to mixtures) and 46a (as amended by EU Regulation)	< 1000mg/kg in mixtures - < 100mg/kg for guidance limit for articles - < 100mg/kg for NPE only	EN ISO 18218-1:2015 (leathers) - EN ISO 18218-2:2019 (leathers) - EN ISO 18254-1:2016 (textiles)		●	●					
				●	●					●	

Octyl phenol (OP) and octyl phenol ethoxylates (OPE)	No direct legislation, but commonly advised	< 1000mg/kg in mixtures < 100mg/kg for articles	EN ISO 18218-1:2015 (leathers) - EN ISO 18218-2:2019 (leathers) EN ISO 18254-1:2016 (textiles)	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
				•	•	•					•
ClO to Cl13 Chloroalkanes, SCCP (short chained chlorinated paraffins)	Persistent Organic Pollutants Regulation (EU) - (POPs)	< 1% in substances or mixtures < 0.15% in articles (see Appendix 7a)	EN ISO 18219:2015 - EN 12766-1:2000	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
				•	•	•	•	•			•
Heavy metals (Pb, Cd, Hg & Cr VI)	European Packaging Directive 2004/12/EC UK&EU RoHS	< 100mg/kg total sum of Pb, Cd, Hg and Cr VI Hg < 1000mg/kg - Cr VI < 1000mg/kg - Cd < 100mg/kg - Pb < 1000mg/kg	EN 1122:2001 (modified) - EN 16711-1:2015	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
				•	•	•	•	•	•	•	
Brominated flame retardants	UK&EU REACH - Annex XVII(17) - Entry 67 UK&EU REACH - Annex XVII(17) - Entry 45 Persistent Organic Pollutants Regulation (EU) - (POPs) UK&EU RoHS	< 1000mg/kg of Decabromodiphenyl ether (Deca BDE) < 1000mg/kg of Octabromodiphenyl ether (Octa BDE) < 500mg/kg sum of Tetra bromodiphenyl ether (Tetra BDE), Pentabromodiphenyl ether (Penta BDE), Hexabromodiphenyl ether (Hexa BDE), Heptabromodiphenyl ether (Hepta BDE) and Decabromodiphenyl ether (Deca BDE) (see Appendix 7a) < 1000mg/kg of Polybrominated biphenyls (PB8) and Polybrominated diphenyl ethers (PBDE) (see Appendix 7a)	EN ISO 17881-1:2016	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
				•	•	•	•	•	•		
				•	•	•	•	•			
				•	•	•	•	•	•	•	
				•	•	•	•	•			
1-methyl-2-pyrrolidone (NMP)	UK&EU REACH - Annex XVII(17) - Entry 71 (see also REACH candidate list) UK&EU REACH - Annex XVII(17) - Entry 72 (see also REACH candidate list)	< 0.3% in mixtures < 3000mg/kg	EN ISO 19070:2016	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
				•	•	•					•
Polybrominated biphenyls	UK&EU REACH - Annex XVII(17) - Entry 8	Shall not be used in textile articles intended to come into contact with the skin	GC-ECD or GC-MS - EN ISO 17881-1:2016	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
				•	•	•					

Octyl phenol (OP) and octyl phenol ethoxylates (OPE)	No direct legislation, but commonly advised (POPs)	< 1000mg/kg in mixtures < 100mg/kg for articles	EN ISO 18218-1:2015 (leathers) - EN ISO 18218-2:2019 (leathers) - EN ISO 18254-1:2016 (textiles)	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
C10 to C13 Chloroalkanes, SCCP (short chained chlorinated paraffins)	Persistent Organic Pollutants Regulation (EU) - (POPs)	< 1% in substances or mixtures < 0.15% in articles (see Appendix 7a)	EN ISO 18219:2015 - EN 12766-1:2000	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
Heavy metals (Pb, Cd, Hg & Cr VI)	European Packaging Directive 2004/12/EC UK&EU RoHS	< 100mg/kg total sum of Pb, Cd, Hg and Cr VI Hg < 1000mg/kg - Cr VI < 1000mg/kg - Cd < 100mg/kg - Pb < 1000mg/kg	EN 1122:2001 (modified) - EN 16711-1:2015	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
Brominated flame retardants	UK&EU REACH - Annex XVII(17) - Entry 67	< 1000mg/kg of Decabromodiphenyl ether (Deca BDE)	EN ISO 17881-1:2016	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
	UK&EU REACH - Annex XVII(17) - Entry 45	< 1000mg/kg of Octabromodiphenyl ether (Octa BDE)		Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
	Persistent Organic Pollutants Regulation (EU) - (POPs)	< 500mg/kg sum of Tetrabromodiphenyl ether (Tetra BDE), Pentabromodiphenyl ether (Penta BDE), Hexabromodiphenyl ether (Hexa BDE), Heptabromodiphenyl ether (Hepta BDE) and Decabromodiphenyl ether (Deca BDE) (see Appendix 7a)		Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
	UK&EU RoHS	< 1000mg/kg of Polybrominated biphenyls (PBB) and Polybrominated diphenyl ethers (PBDE) (see Appendix 7a)		Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
1-methyl-2-pyrrolidone (NMP)	UK&EU REACH - Annex XVII(17) - Entry 71 (see also REACH candidate list)	< 0.3% in mixtures	EN ISO 19070:2016	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
	UK&EU REACH - Annex XVII(17) - Entry 72 (see also REACH candidate list)	< 3000mg/kg		Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
Polybrominated biphenyls	UK&EU REACH - Annex XVII(17) - Entry 8	Shall not be used in textile articles intended to come into contact with the skin	GC-ECD or GC-MS - EN ISO 17881-1:2016	Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix

				Lths	N.Tex	S.Tex	Plas	Rubs	Wood	Metal	Mix
Tris (2,3 dibromopropyl) phosphate (Flame retardant)	UK&EU REACH - Annex XVII(17) - Entry 4	Shall not be used in textile articles intended to come into contact with the skin	EN ISO 17881-2:2016		●	●					
Dimethylformamide (DMF)	UK&EU REACH - Annex XVII(17) - Entry 72	< 3000mg/kg (<1000mg/kg recommendation for PU materials)	PD CEN ISO/TS 16189:2013 - EN 16778:2016	Lths	●	●	●			Metal	Mix
Dimethylacetamide (DMAC)	UK&EU REACH - Annex XVII(17) - Entry 72	< 3000mg/kg	PD CEN ISO/TS 16189:2013 (modified)	Lths	●	●	●			Metal	Mix
Benzene	UK&EU REACH - Annex XVII(17) - Entry 5	< 1mg/kg in mixtures	GC-MS Headspace	Lths							●
	UK&EU REACH - Annex XVII(17) - Entry 72	< 5mg/kg			●	●	●				
Asbestos	UK&EU REACH - Annex XVII(17) - Entry 6	<u>Not to be used</u>	MDHS 39/4	Lths						Metal	Mix
Chlorotoluenes	UK&EU REACH - Annex XVII(17) - Entry 72	< 1mg/kg of p-chlorobenzotrifluoride, benzotrifluoride or benzyl chloride	EN 17137:2018	Lths	●	●	●			Metal	Mix
Quinoline	UK&EU REACH - Annex XVII(17) - Entry 72	< 50mg/kg	Solvent extraction followed by LC-MS/MS or LC-DAD detection	Lths	●	●	●			Metal	Mix
Pesticides	Persistent Organic Pollutants Regulation (EU) - (POPs)	See Appendix 7b	ISO 22517:2019	Lths	●	●	●			Metal	Mix
END											
<p>NOTE: UK REACH - Statutory Instruments 2020 No. 1577 Exiting the European Union Consumer Protection Environmental Protection Health and Safety. The REACH etc. (Amendment etc.) (EU Exit) Regulations 2020. EU REACH - Regulation (EC) No 1907/2006. Equal to as above: UK&EU REACH.</p> <p>NOTE: EU RoHS 2 Directive - 2011/65/EU and UK The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012. Equal to as above UK&EU RoHS.</p> <p>NOTE: This document acts only as guidance to the UK&EU REACH regulations. The full list of substances restricted under REACH can be found at https://echa.europa.eu/substances-restricted-under-reach last updated on 22 February 2021. Please refer to DFS Testing Specification for specific product requirements.</p> <p>NOTE: This document acts only as guidance to the UK&EU REACH declaration that must be complete by all supplying partners to the DFS Group. Please refer to the DFS Group members Testing Specification for specific product requirements, however, any further technical information or clarification regarding test methods, can be discussed with your ISO17025 accredited chemical testing laboratory.</p>											

DFS Trading Limited (DFS)

Appendix 1 – Restricted aromatic amines in REACH Regulation (EC) No 1907/2006 Entries 43 and 72	
Amine	CAS Number
4-amino bi phenyl	92-67-1
Benzidine	92-87-5
4-chloro-o-toluidine	95-69-2
2-naphthylamine	91-59-8
o-aminoazotoluene	97-56-3
5-nitro-o-toluidine	99-55-8
4-chloroaniline	106-47-8
4-methoxy-m-phenylenediamine	615-05-4
4,4'-methylenedianiline	101-77-9
3,3'-dichlorobenzidine	91-94-1
3,3'-dimethoxybenzidine	119-90-4
3,3'-dimethylbenzidine	119-93-7
4,4'-methylenedi-o-toluidine	838-88-0
6-methoxy-m-toluidine	120-71-8
2-chloroaniline	101-14-4
4,4'-oxydianiline	101-80-4
4,4'-thiodianiline	139-65-1
o-toluidine	95-53-4
4-methyl-m-phenylenediamine	95-80-7
2,4,5-trimethylaniline	137-17-7
o-anisidine	90-04-0
4-aminoazobenzene	60-09-3
2,4-xylidine	95-68-1
2,6-xylidine	87-62-7

Appendix 2a – Restricted phthalates in REACH Regulation (EC) No 1907/2006 Annex XVII Entries 51 and 52			
Phthalate	Abbreviation	CAS number	Restrictions
Bis (2-ethylhexyl) phthalate	DEHP	117-81-7	No greater than 0.1% (individually or in any combination of the phthalates) by mass of plasticised material in articles
Dibutyl phthalate	DBP	84-74-2	
Benzyl butyl phthalate	BBP	85-68-7	
Di-isobutyl phthalate	DIBP	84-69-5	
Di-isononyl phthalate	DINP	28553-12-0 68515-48-0	No greater than 0.1% (individually or in any combination of the phthalates) by mass of plasticised material in toys and childcare articles which can be placed in the mouth
Di-isodecyl phthalate	DIDP	26761-40-0 68515-49-1	
Di-n-octyl phthalate	DNOP	117-84-0	

Appendix 2b – Restricted phthalates in REACH Regulation (EC) No 1907/2006 Annex XVII Entry 72			
Phthalate	Abbreviation	CAS number	Restrictions
1,2-benzenedicarboxylic acid; diC 6-8-branched alkylesters, C 7- rich	DIHP	71888-89-6	< 0.1% (individually or in combination with other phthalates in this entry or in other entries of Annex XVII that are classified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 in any of the hazard classes carcinogenicity, germ cell mutagenicity or reproductive toxicity, category 1A or 1B
Bis(2-methoxyethyl) phthalate	*	117-82-8	
Diisopentylphthalate	DIPP	605-50-5	
Di-n-pentyl phthalate	DnPP	131-18-0	
Di-n-hexyl phthalate	DnHP	84-75-3	

Appendix 3 – REACH Regulation (EC) No 1907/2006 Annex XVII Entries 50 and 72

<u>Polycyclic aromatic hydrocarbon (PAH)</u>	<u>CAS number</u>	<u>Restriction in toys*</u> (mg/kg)	<u>Restriction in articles* (mg/kg)</u>
Benzo[a]pyrene	50-32-8	< 0.5	< 1
Benzo[e]pyrene	192-97-2		
Benzo[a]anthracene	56-55-3		
Chrysene	218-01-9		
Benzo[b]fluoranthene (Benz[e]acephenanthrylene)	205-99-2		
Benzo[j]fluoranthene	205-82-3		
Benzo[k]fluoranthene	207-08-9		
Dibenzo[a,h]anthracene	53-70-3		

*** *The restrictions apply to the rubber and plastic components of both toys and articles which come into contact with the human skin or oral cavity.**

Appendix 4 - Restricted organotin compounds and specific requirements for DOT

<u>Organotin</u>	<u>Abbreviation</u>
Tributyltin	TBT
Triphenyltin	TPhT
Dibutyltin	DBT
Diocetyl tin	DOT

Diocetyl tin (DOT) compounds shall not be present above 0.1% by weight of tin in the following articles:

Textile articles intended to come into contact with the skin

Childcare articles

Wall and floor coverings

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Appendix 5 – Allergenic and carcinogenic disperse dyes	
Allergenic disperse dyes Disperse blue 3 Disperse blue 7 Disperse blue 26 Disperse blue 35 Disperse blue 102 Disperse blue 106 Disperse blue 124 Disperse brown 1 Disperse orange 1 Disperse orange 3 Disperse orange 37/59/76 Disperse red 1 Disperse red 11 Disperse red 17 Disperse yellow 1 Disperse yellow 9 Disperse yellow 39 Disperse yellow 49	Allergenic and carcinogenic dyes Disperse yellow 3 Carcinogenic dyes Acid red 26 Basic red 9 Basic violet 3 Basic violet 14 Direct black 38 Direct blue 6 Direct red 28 Disperse blue 1 Disperse orange 11 Further forbidden dyes Disperse orange 149 Disperse yellow 23
Appendix 6 – Restricted brominated flame retardants in REACH and/or RoHS 2	
Flame retardant substances	
Monobromobiphenyls Dibromobiphenyls Tribromobiphenyls Tetrabromobiphenyls Pentabromobiphenyls Hexabromobiphenyls Heptabromobiphenyls Octabromobiphenyls Nonabromobiphenyls Decabromobiphenyls	Monobromobiphenyl ethers Dibromobiphenyl ethers Tribromobiphenyl ethers Tetrabromobiphenyl ethers Pentabromobiphenyl ethers Hexabromobiphenyl ethers Heptabromobiphenyl ethers Octabromobiphenyl ethers Nonabromobiphenyl ethers Decabromobiphenyl ethers


Appendix 7a – Persistent Organic Pollutants Regulation (EU) 2019/1021 as amended by (EU) 2020/784 – Restrictions for industrial chemicals

<u>Substance</u>	<u>CAS Number</u>	<u>Maximum allowable concentration in</u>
		<u>Articles</u>
Hexachlorobenzene	118-74-1	None detected
Polychlorinated biphenyls (PCBs)	1336-36-3 and others	< 0.005% (50mg/kg)
Hexabromobiphenyl	36355-01-8	None detected
Hexabromocyclododecane	25637-99-4, 3194-55-6, 134237-50-6, 134237-51-7, 134237-52-8	< 0.01% (100mg/kg)
Bromodiphenyl ethers (Tetra-, Penta-, Hexa-, Hepta- and Deca-)	40088-47-9, 32534-81-9, 36483-60-0, 68928-80-3 and 1163-19-5	< 0.05% sum of (500mg/kg)
Hexachlorobutadiene	87-68-3	None detected
Pentachlorobenzene	608-93-5	None detected
Perfluorooctane sulfonic acid (PFOS) and its derivatives	1763-23-1, 2795-39-3, 29457-72-5, 29081-56-9, 70225-14-8, 56773-42-3, 251099-16-8, 4151-50-2, 31506-32-8, 1691-99-2, 24448-09-7, 307-35-7 and others	< 0.1% (1000mg/kg)
Polychlorinated naphthalenes	70776-03-3 and others	None detected
Short-chained chlorinated paraffins (SCCPs)	85535-84-8 and others	< 0.15% (1500 mg/kg)
Perfluorooctanoic acid (PFOA)	335-67-1	< 0.0000025% (25µg/kg)
Perfluorooctanoic acid related compounds	...	< 0.0001% (1mg/kg)


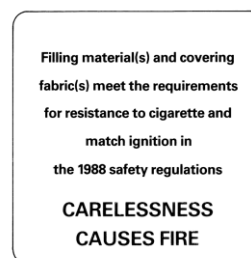


Appendix 7b – Persistent Organic Pollutants Regulation (EU) 2019/1021 as amended by (EU) 2020/784 – Restrictions for pesticides

<u>Substance</u>	<u>CAS Number</u>	<u>Maximum allowable concentration in Articles</u>
Aldrin	309-00-2	None detected
Chlordane	57-74-9	
Dichloro-diphenyl- trichloroethane (DDT)	50-29-3	
Dieldrin	60-57-1	
Endrin	72-20-8	
Heptachlor	76-44-8	
Hexachlorobenzene	118-74-1	
Mirex	2385-85-5	
Toxaphene	8001-35-2	
Hexachlorocyclohexane (including lindane)	58-89-9, 319-84-6, 319-85-7 and 608-73-1	
Chlordecone	143-50-0	
Pentachlorobenzene	608-93-5	
Pentachlorophenol	87-86-5	
Endosulfan	115-29-7, 959-98-8 - 33213-65-9	

APPENDIX 7 – REGULATORY, STRUCTURAL, SAFETY, AND PERFORMANCE TESTING GUIDANCE

UK REGULATORY and EU DIRECTIVE DECLARATIONS REQUIRED:	
REACH Regulations (UK and EU)	Signed documents required annually.
BIOCIDES Regulations (UK and EU)	Signed documents required annually.
ELECTRICAL Declaration of Conformity (D.O.C) CE and UKCA marking (UK and EU)	Signed documents required annually. Both CE and UKCA marks on applicable components by <u>31/12/21</u> .
UK REGULATORY and EU DIRECTIVE - TEST REPORTS REQUIRED FOR ELECTRICAL COMPONENTS:	
RoHS - Hazardous Substances EMC - Electro Magnetic Compatibility LVD - Low Voltage Joint CE and UKCA markings – For example only 	Test report required for each component. Test report date must be within 6 months of purchase. New test reports are required for new suppliers or component composition change. Where finished articles exceed 3 years, renewed test reports will be required.
UK REGULATORY - FIRE PROTECTION REQUIREMENTS FOR ALL DOMESTIC UPHOLSTERY:	
<p>In accordance with the Furniture and Furnishings (Fire Safety) Regulations 1988. All testing and labelling in this section is required for all markets DFS supplies.</p> <p>All upholstered products must have test reports within 6 months of purchasing, renewed test reports must be submitted every 12 months unless otherwise agreed by DFS Trading Limited.</p> <p>All testing must be performed at testing houses accredited to ISO17025, awarded by accreditation bodies who are signatories of the ILAC, for example, UKAS / CNAS or similar.</p>	
INTERIORS - FOAM	
Polyurethane (PU) - Slab Foam	Schedule 1 - Part 1
Polyurethane (PU) – Crumb Foam*	Schedule 1 - Part 2
Latex Rubber	Schedule 1 - Part 3
INTERIORS - NON-FOAM	
Single non-foam filling	Schedule 2 - Part 1
Furniture composite fillings*	Schedule 2 - Part 2
Pillows and Scatter cushions*	Schedule 2 - Part 3
Mattress composite fillings*	Schedule 2 - Part 4
* All foams used in composites must have met Schedule 1 – Part 1 prior to this test method.	
INTERIORS – FIRE BARRIERS / INTERLINERS	
FR and Non-FR Materials*	Schedule 3
*Fire barriers / Interliners can only be used if the visible cover is 75% of one or a mixture of natural fibres (E.g., Flax, Cotton, Viscose)	

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COVERS - CIGARETTE TEST	
Visible covers – FR and Non-FR treated	Schedule 4 - Part 1
Non-Visible covers – FR and Non-FR treated	Schedule 4 - Part 2
COVERS - MATCH TEST	
Visible and Loose covers – FR and Non-FR treated	Schedule 5 - Part 1
Non-Visible covers – FR and Non-FR treated	Schedule 5 - Part 3
DISPLAY LABEL	
<p>Schedule 6 of the regulations*</p> <p>*Display labels must be on all finished articles, in stores and customer products.</p> <p>Note: Display label images are for example purposes, specific requirements can be found on: legislation.gov.uk/ukxi/1988/1324/contents/made</p> <p>Note: It is DFS Trading Limited policy that regardless of finished article size, all fillings must meet either schedule 1 or 2 depending on material.</p> <p>All covers must be cigarette and match tested, or cigarette tested if used with a schedule 3 fire barrier. Please ensure the fabric composition is 75% of one or more natural fibres.</p>	<p>Display label for all upholstered products that <u>do</u> <u>not</u> have fire barriers. Visible covers must have schedule 4 and 5 part 1 test reports.</p> <div data-bbox="986 609 1251 875" data-label="Image">  </div> <div data-bbox="986 902 1238 1158" data-label="Image">  </div> <p>Display label for all upholstered products that <u>do</u> have fire barriers. Visible covers must have schedule 4 part 1 test reports, and a schedule 3 compliant fire barrier test report.</p> <p>Visible covers must be at least 75% of one or more natural fibres to use a schedule 3 fire barrier and the label below.</p> <div data-bbox="981 1503 1228 1722" data-label="Image">  </div> <div data-bbox="981 1749 1228 1971" data-label="Image">  </div>

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PERMANENT LABEL	
<p>Schedule 7 of the regulations*</p> <p>Note: Display label images are for example purposes, specific requirements can be found on: legislation.gov.uk/uksi/1988/1324/contents/made</p> <p>Note: Full permanent label and manufacturer details must be provided to DFS Trading Limited within 5 working days if requested for regulatory purposes.</p>	<p>All sections shall bear a label which sets out, in order, the following: Short Version</p> <p>(a) The words “CARELESSNESS CAUSES FIRE”</p> <p>(b) The batch number or identification number (if any) of the article in question</p> <p>(c) Whether or not the article includes an interliner which passes the test in Schedule 3</p> <p>(d) A summary of the measures which have been taken to ensure that the article complies with the requirements of the Regulations.</p>
MATTRESSES, DIVAN BASES AND TOPPERS ONLY	
<p>Domestic Mattresses - (Low Hazard) Specification for resistance to ignition of mattresses, mattress pads, divans and bed bases</p> <p>Mattresses and Divans. Assessment of the ignitability of mattresses and upholstered bed bases. Ignition source smouldering cigarette</p> <p>Mattresses and Divans. Assessment of the ignitability of mattresses and upholstered bed bases. Ignition source: match flame equivalent</p>	<p>BS 7177: 2008 + A1: 2011 (Low Hazard)</p> <p>Note: Test report must be inside 6 months of the manufacturing date, this is based on the testing frequency in BS 7177.</p> <p>DFS Trading Limited specify all manufacturing dates to be on the reverse of the product label.</p> <p>BS EN 597-1: 1995 (Referenced in BS 7177 above)</p> <p>BS EN 597-2: 1995 (Referenced in BS 7177 above)</p>
CLEANLINESS OF MATTRESSES FILLING MATERIALS	
<p>Mattresses and Toppers. Cleanliness of fillings and stuffings for bedding, upholstery and other domestic articles - Specification for fillings and stuffings other than feather and/or down</p>	<p>BS 1425: Part 1: 1991</p>
<p>Mattresses and Toppers. Feather and down. Hygiene and cleanliness requirements</p>	<p>EN 12935:2001</p>

Note:

Where mattresses and toppers are different when flipped over, the BS 7177 (low hazard) composite tests must be performed on both sides of the mattress.

In order to meet BS 7177 requirements, there is a testing frequency. If test reports are not in line with the standard, or identified and not compliant to the standard whilst labelled, suppliers will be held accountable.

All mattress filling must meet the Furniture and Furnishings (Fire Safety) Regulations 1988 in their own right before taking the BS 7177 composite mattresses test.

Label Requirements.

- Mattresses, all depths and sizes
- Sofa bed mattresses
- Mattresses toppers
- Divan Bases

Test standard: BS 7177: 2008

Test rating: for domestic use (low hazard)

Manufacturing date: On the reverse of the label

Note:

For traceability purposes, where mattresses are supplied singly or as part of a finished article, fully traceability should be achieved by the manufacturing date in the permanent label.

**Note:**

The mattresses permanent label must be sewn into products and not easily removed.

UK and EU REGULATORY DUE DILIGENCE - TEST REPORTS REQUIRED:

DFS Trading Limited supplies the mass UK and EU markets, therefore, all finished articles must have a Strength, Durability and Safety test report to a recognised British (BS), European (EN) or harmonised standards.

Test reports are required to ensure DFS Trading Limited meets stakeholder requirements to both UK General Product Safety Regulations and the EU General Product Safety Directive.

All test reports must be within 6 months of purchasing, new test reports are required for any form of component or finished article composition change.

Where finished articles exceed 3 years, renewed test reports will be required.

All testing must be performed at testing houses accredited to ISO17025, awarded by accreditation bodies who are signatories of the ILAC, for example, UKAS / CNAS or similar.

BATTERIES IN, OR DESIGNED FOR USE WITH FURNITURE :	
<p>Secondary cells and batteries containing alkaline or other non-acid electrolytes.</p> <p>Safety requirements for portable sealed secondary cells, and for batteries made from them, for use in portable applications.</p>	<p>BS EN 62133-1:2017 Part 1 - Nickel Systems</p> <p>BS EN 62133-2:2017 Part 2 - Lithium Systems</p>
SEATING :	
<p>Seating (Domestic) Strength, durability and safety. Requirements for domestic seating</p>	<p>BS EN 12520:2015 (on BS EN 1728 : 2012)</p> <p>All forms of domestic and occasional seating.</p>
<p>Seating (Non-domestic) Strength, durability and safety. Requirements for non-domestic seating</p>	<p>BS EN 16139:2013 (on BS EN 1728 : 2012)</p> <p>DFS BSI Kitemark scheme / 15 year guarantee</p>
<p>Motion Seating. Chairs with electrically operated support surfaces. Requirements</p> <p>Motion Seating. Operating mechanisms for seating and sofa-beds. Test methods</p>	<p>BS 8474:2013 (to 110kg user) Note: Test to 160kg user where possible.</p> <p>BS EN 13759:2012 (to 110kg user, 20,000 cycles to pass) Note: Test to 160kg user where possible.</p>
<p>Domestic furniture. Operating mechanisms for seating and sofa-beds. Test methods</p> <p>Domestic furniture. Operating mechanisms for seating and sofa-beds. Test methods</p>	<p>BS EN 1725:1998</p> <p>BS EN 13759:2012</p>
<p>Domestic Office Seating. Office work chair. Safety requirements</p>	<p>BS EN 1335-2:2018 (Gas lift seating only)</p>
<p>Outdoor furniture (Domestic and Camping) Seating and tables for camping, domestic and contract use. General safety requirements</p> <p>Outdoor furniture (Domestic and Camping) Seating and tables for camping, domestic and contract use. Mechanical safety requirements for tables</p> <p>Corrosion of metals and alloys. Accelerated cyclic test with exposure to acidified salt spray, dry and wet conditions</p>	<p>BS EN 581-1:2017 All Requirements</p> <p>BS EN 581-3:2017 Outdoor – Domestic Requirements Camping – Camping Requirements</p> <p>BS EN ISO 16151:2018 All domestic outdoor and camping furniture if applicable.</p>

Note:

All Outdoor and Camping upholstered furniture must meet the requirements of step 3 above, including compliance to the Furniture and Furnishings (Fire Safety) Regulations.

Outdoor seating may include, but not limited to:

- Camping Chairs
- Camping Stools
- Camping Beds
- Outdoor Domestic Chairs
- Swing Seats
- Hammocks
- Outdoor Recliners/Sunbeds

Products that can either be stored or used in an enclosed indoor space, must meet the requirements above.

SOFT FURNISHINGS: (including Pet Beds)

All upholstered soft furnishings or finished articles regardless of product purpose must meet the testing and labelling requirements in Step 3 in accordance with the Furniture and Furnishings (Fire Safety) Regulations 1988. This is DFS policy.

This includes all outdoor upholstery that can be stored in a dwell, and upholstered Pet Products.

TABLES :

All Tables. Strength, durability and safety. Requirements for domestic tables	BS EN 12521:2015 (requirements) BS EN 1730:2012 (test method) All indoor tables <u>under</u> 600mm (60cm) in height All indoor tables <u>over</u> 600mm (60cm) in height
Outdoor furniture (Domestic and Camping) Seating and tables for camping, domestic and contract use. General safety requirements Outdoor furniture (Domestic and Camping) Seating and tables for camping, domestic and contract use. Mechanical safety requirements for tables Corrosion of metals and alloys. Accelerated cyclic test with exposure to acidified salt spray, dry and wet conditions	BS EN 581-1:2017 All Requirements BS EN 581-3:2017 Domestic - Domestic Requirements Camping - Camping Requirements BS EN ISO 16151:2018 All domestic outdoor and camping furniture if applicable.
Note: All Outdoor and Camping upholstered furniture must meet the requirements in compliance to the Furniture and Furnishings (Fire Safety) Regulations. Please refer to the relevant seating specification.	
Adjustable Tables and Desks. Work tables. Safety, strength and durability requirements	BS EN 527-2:2016+A1:2019

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Adjustable Tables and Desks. Work tables and desks. Methods of test for the determination of the stability and the mechanical strength of the structure	BS EN 1730:2012 (referenced in the above)
SIDEBOARDS, STORAGE FURNITURE, AUDIO FURNITURE :	
Domestic and kitchen storage units and kitchen-worktops. Safety requirements and test methods	BS EN 14749:2016 (Safety - domestic only)
Domestic and non-domestic storage furniture. Test methods for the determination of strength, durability and stability	BS EN 16122:2012 (Domestic only)
Strength and stability of furniture. Domestic and contract storage furniture. Performance requirements	BS 4875-7:2006 Test level 3 – General domestic for all DFS furniture
Audio/video, information and communication technology equipment. Safety requirements Note: Only if applicable. DFS approval required	BS EN IEC 62368-1:2020+A11:2020 (Safety requirements only) Note: TV, electronic and gaming units only
Side Boards and Storage Units may include, but not limited to: <ul style="list-style-type: none"> • Wardrobe • Chest of Drawers / Bed side draws • Pivoted Door Unit with Shelves • Sliding Door/Flap Unit • Wall Mounted Cabinet • TV Units without glass • TV Units with glass • Wall Units 	
GLASS IN FURNITURE :	
Glass in Furniture. Thermally toughened soda lime silicate safety glass. Definition and description	BS EN 12150-1:2015+A1:2019 (Glass fragmentation) Note: All tables made of, or including glass much include this test in addition to the above
BEDFRAMES AND MATTRESSES (INCLUDING UPHOLSTERED AND MECHANICAL) :	
Children's furniture. Crisbs. Safety requirements and test methods	BS EN 1130:2019
Children's beds for domestic use. Safety requirements and test methods	BS 8509:2008+A1:2011
Domestic furniture. Bunk beds and high beds. Safety, strength and durability requirements	BS EN 747-1:2012+A1:2015

Domestic furniture. Bunk beds and high beds. Test methods	BS EN 747-2:2012+A1:2015
Domestic furniture. Beds and mattresses. Safety requirements and test methods	BS EN 1725:1998
Beds and mattresses. Test methods for the determination of functional characteristics and assessment criteria	BS EN 1957:2012 (no more than 10% loss in height following the first set of cycles)
Domestic furniture. Operating mechanisms for seating and sofa-beds. Test methods	BS EN 13759:2012

DFS INNOVATION :

DFS Trading Limited supplies the mass UK and EU markets, therefore, all finished articles must have a Strength, Durability and Safety test report to a recognised British (BS), European (EN) or harmonised (BS, EN).

New designs and design led products may not meet all requirements in pre-existing recognised British (BS), European (EN) or harmonised standards, however, DFS must meet stakeholder expectations to both UK General Product Safety Regulations and the EU General Product Safety Directive.

Finished articles that may not pass the set test methods and requirements, it may be acceptable with a risk assessment and product awareness labelling.

All risk assessments must meet the following criteria:

Product Risk and Safety Assessment Where some recognised BS and EN test methods may not fully reflect how products are used by the end user, risk assessments allows DFS to assess worst case scenario that may not be within test method scope. Note: DFS risk assessments may request various testing from test methods of the standards above, however, it may be acceptable to test to different measurements that may be acceptable if accompanied with primary awareness.	What should a risk assessment include? <ol style="list-style-type: none"> 1. Product dimensions and details 2. Images 3. Assessment of safety risks, including both accidental and deliberate use 4. Suggestion to consumer safety awareness labelling 5. Electrical and wiring safety 6. Fully set of Assembly Instructions (AIs) and product safety or care details 7. Key risks must be highlighted. For example, entrapments, lacerations, possible bruising and other injury if not used correctly
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APPENDIX 8 – INTERIORS SYSTEM REQUIREMENTS

This control will be required at New Product Development, DFS Product Sign Off and part of the DFS COP.

FOAM INTERIORS - (Including Non-foam topping only)								
	Volume of area to fill in CM3 (LxWxH)	Depth / Height	Weight in KGs	Density	Hardness	Fibre Top – Sheet or Blown?	Non-Foam Composition (Natural, Synthetic or Recycled)	Fibre Height or Weight
Seat Pads (including fixed)								
Back Cushions (including fixed and lumbar support)								
Arm Pads								
Headrest								
Other								
Please add any other relevant comments:								
NON-FOAM INTERIORS - (Including Natural, Synthetic or Recycled)								
	Volume of area to fill in CM3 (LxWxH)	Depth / Height	Weight in KGs	Packing Density	Non-Foam Composition (Natural, Synthetic or Recycled)	Sectioned bag, with weight in KG (Y/N)	Fibre Height or Weight	
Seat Pads (including fixed)								
Back Cushions (including fixed and lumbar support)								
Arm Pads								
Headrest								
Other								
Please add any other relevant comments:								

DFS Group Support Centre
Quality and Compliance Department