



'Supplier Code of Practice'

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V002a	Paul Vaughan on behalf of DFS Trading	Update in DFS Group Policies, changes made to bring appendices up to date	Technical, Quality and Compliance Department	Robin Scott	August 2021
V003	Paul Vaughan on behalf of DFS Trading	Refreshed appendices to include more detailed levels of expectation and requirements. New clause added 6.17 which outlines the auditing of indirect supplying partners and auditor specification	Technical, Quality and Compliance Department	Robin Scott	May 2023

DFS Trading Limited (DFS)

FOREWORD:

This document has been produced by the Group Support Centre Quality Department and approved by Nick Smith (DFS CEO), on behalf of DFS Trading Limited also referred to as DFS throughout this document.

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

Other companies under the DFS Group may use the Code of Practice and related audit documentation and where agreed, supplying partners may use the Code of Practice and related documentation. Further details of the use of the DFS Code of Practice are specified in section 1 and section 5.

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.

This document is a Code of Practice and a standard which DFS expects suppliers to adhere too. Where serious regulatory differences occurs, a professional opinion should be sought to support the difference, and concerns raised via the complaints process detailed in section 9.0 of this document.

INTELLECTUAL PROPERTY:

You acknowledge and agree that all copyright, trademarks, and all other intellectual property rights in all materials and/or content made available as part of your use of this Code of Practice shall always remain with DFS.

You are permitted to use this material only as expressly authorised by DFS.

You acknowledge and agree that the material and content contained within this Code of Practice is made available for your compliance of DFS requirements and not for your own commercial use.

You further acknowledge that any other use of the material and content of this Code of Practice is strictly prohibited, and you agree not to (and agree not to assist or facilitate any third party to) copy, reproduce, transmit, publish, display, distribute, commercially exploit, or create derivative works of such material and content in this Code of Practice.

RELATED DOCUMENTS:

1. DFS Testing Policy
2. DFS Group Environmental and Leather Policies
3. DFS Group Sustainable Sourcing Policy
4. DFS Group Timber Policy
5. DFS Chemical and Substance Declaration
6. DFS Declarations of Conformity

Note: Please visit **Appendix 1** to understand all DFS Group Policies related to this Code of Practice.

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DFS Trading Limited (DFS)

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 provide 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 non-upholstered 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.

Terms of use of the DFS Code of Practice:

The DFS Code of Practice is a controlled measurement of success and continuous improvement vehicle to deliver the requirements of DFS.

Not all requirements and levels of expectation in this Code of Practice may be the opinion and understanding of others, however, in this instance the Code of Practice should not be used.

Where the DFS Code of Practice is adopted by other DFS Group PLC parties, a formal process must take place to fully engage and implement the Code of Practice with the user.

The process must include, but is not limited to the following criteria:

1. All users adopting the DFS Code of Practice must undergo a full understanding and training period of the Code of Practice requirements.
2. All assessors and auditors of the DFS Code of Practice must be a minimum of ISO 9001 Internal Auditor level trained by a CQI/IRCA appointed training provider. This training should be less than 3 years old if not an active auditor.
3. All users of the Code of Practice will be assessed prior to approval.
4. All users of the Code of Practice must attend Version update meetings and training where required.

DFS Trading Limited (DFS)

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 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.
- 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.

DFS Trading Limited (DFS)

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.

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.

DFS Trading Limited (DFS)

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 (direct):

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

Supplier (indirect):

May be considered as companies or individual(s) who have either manufactured themselves or purchased finished articles (products) purchased by a direct DFS supplying partner for resale to DFS.

Sub-contractor:

May be considered as a partner or person that carries out work for a company as part of a larger project. For example, cut and sew or frame building, and any finished article component as part of the final finished article.

Importer:

May be considered as companies or individual(s) who 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 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 can both equally accredit laboratories to ISO standards like ISO17025.

DFS Trading Limited (DFS)

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 can both 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.

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 only.

DFS Trading Limited (DFS)

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.

DFS Trading Limited (DFS)

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 (SMETA, FSC).
- 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.
- q) Business on-boarding processes and DFS direct partners, component suppliers and sub-contractors.

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 DFS for sale and placed on the market within the UK are fully compliant with the relevant regulations and this Code of Practice.

DFS Trading Limited (DFS)

5.0 MANAGEMENT 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.

Supplying partner type and audit expectations:

Direct Manufacturing Supplying Partners:

All partners supplying directly to DFS must be signatories of the DFS COP. It is the responsibility of the DFS direct supplier to undergo all audits and provide the evidence required.

Direct Non-manufacturing Supplying Partners:

All partners supplying directly to DFS must be signatories of the DFS COP. It is the responsibility of the DFS direct supplier to undergo an audit with a DFS representative, to audit all indirect DFS suppliers and provide the level of evidence required.

Indirect Manufacturing Supplying Partners:

All finished article suppliers of Manufacturers, Wholesalers, Importers and Agents who directly supply DFS must be signatories of the DFS COP as well as themselves. It is the responsibility of the DFS direct supplier or agent to coordinate all audits and collect the level of evidence required.

Component Suppliers and Sub-contractors:

All sub-contractors and key component suppliers must be audited in line with the DFS COP. As a minimum requirement, corporate policy, process, and procedural evidence should be in line with DFS pre-audit questionnaire as this is viewed as a minimum requirement.

Note: Please see **appendix 9** – Documentation and Certification for a detailed list of corporate process, policy, and procedure. This will help with DFS expectation and documents for DFS control.

Approved Use of the DFS Code of Practice:

DFS suppliers may use the DFS Code of Practice to audit their suppliers, however, only the DFS representative can assess the audit and information provided for DFS use. The DFS auditors may request to visit any indirect finished article supplier or component supplier to DFS. ***This due diligence request must be fully entertained by the direct DFS supply partner.***

DFS Code of Practice in line with existing audit criteria:

For agents, wholesalers, and importer partners of DFS, and manufacturing partners of DFS, if you have your own documented auditing procedure in place, we can gap analyse both administrative and physical expectations.

Following a gap analysis, we can mutually agree on any specifics following this process to avoid audit overlap and duplication, however, this is only agreeable with formal and measurable audit processes.

DFS Trading Limited (DFS)

5.1 THE AUDIT PROCESS

- a) A non-current supplier wishing to supply DFS or approached by a DFS buyer, must be a signatory by signing the COP declaration and 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 annually to ensure updates are engaged.
- c) A DFS representative will contact the supplier or potential supplier to arrange an audit date. This should be at least 8 weeks in advance unless otherwise mutually agreed.
- d) Once a date is confirmed, the auditor will send the Pre-Audit Questionnaire and Audit Plan, and the latest version of the DFS Code of Practice.
- e) The supplying partner should complete the Pre-Audit Questionnaire and Audit Plan and return this fully complete with evidenced documentation and certification to the DFS representative no later than ten working days prior to the audit day.
- f) The audit process will be in one location in one day and would typically be complete in ample time in the same day.
- g) All audit evidence is required for our records, this can be either hard or electronic copies. All audit evidence Policies, Processes and Procedures relevant in this Code of Practice should be in English or Bilingual documentation.
- h) The DFS audit plan sets out the plan for the day. The auditor will perform the audit to an approved audit checklist, developed by the Group Support Centre Quality Team.
- i) Once the audit is complete, the auditor will complete the audit documentation which will be submitted to relevant DFS colleagues 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) On completion of the process and once NCs 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.

The DFS representative can issue non-conformities based on the general audit process, for example, not receiving the pre-audit information on time and for any lack of organisation on the day of the audit causing bottlenecks in the audit process.

If an auditor has reason to walk away from an audit, a C rating may be awarded. If an auditee cancels 5 days or less to audit day, the rearranged audit may receive a non-conformity.

DFS Trading Limited (DFS)

5.2 NON-CONFORMITIES AND IMPACTS TO DFS INTERESTS

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

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

Major non-conformity

1. When a DFS representative has to leave an audit with justifiable reasoning
2. Where a situation is considered to have a major impact to DFS products or interests
3. Where key systems, process, policy and procedures in this Code of Practice are missing
4. Where factory processes are not documented and demonstrations are unsatisfactory
5. Where previous minors are still existing
6. Where there is clear product issue, trend or inconsistencies where key systems have failed

Minor non-conformity

1. Where significant practices identified are present in some form
2. Where improvements are required to meet key or documented specified requirements
3. Any form of circumstance that could have a negative impact on DFS interests or products
4. Where any opportunities for improvements have not been satisfied
5. Where relevant process and procedures exist, however, is requested as documented

Opportunity for Improvement / Continuous Improvement

1. Suggestions made by the auditor are in the best interest of DFS. All suggestions will be justified with good reasoning and a clear expectation documented.
2. This is not a non-conformity; however, suppliers should discuss comments with the auditor to satisfy the concern or comment raised.
3. Any disagreements should be fully understood and reasoning why suggestions may not be taken on-board.

DFS Trading Limited (DFS)

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:
<p>A rating – 0 Major NCs and up to 5 Minor NCs. Supplier fully satisfies the Code of Practice and continues with an annual audit.</p>
<p>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 improved audit result the following year. Failure to do so, will result in an unannounced audit.</p>
<p>C rating – 2 Major NCs. Not acceptable and a re audit will be performed in 6 months where key improvements must be achieved. All C-rating audits will be a major cause for concern and DFS Senior Management will be advised of the situation.</p>
<p>Note, if an existing supplier receives a C rating and fails to achieve key improvements the following audit, senior management may wish to act. Note, if a new supplier does not reach a B-rating, re auditing will be no sooner than 6 months and key improvements must be achieved. Note, opportunities for improvement / continuous improvement suggestions may be escalated to a Minor NC if not justified and agreed on the next audit.</p>

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 the DFS representative based on the severity and situation which must be fully justified.

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.

DFS Trading Limited (DFS)

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 AUDITING AND INTERNATIONAL CERTIFICATION

All suppliers of DFS are expected to be ethical and responsible, therefore, a minimum expectation of a third party audit from a recognised service provider is required. The third party final report will be required as evidence. DFS requirements are:

1. **SMETA** 4 pillar audit, where audits are not existing a 2 pillar audit will be initially accepted, followed by a 4 pillar following the expiration date
2. **FSC** - Timber chain of custody
3. **PEFC** - Timber chain of custody
4. **Leather Working Group (LWG)** – Leather Tannery Auditing
5. **OEKO-TEX (OEKO-TEX STEP)** – Textile Mill Auditing

Note:

For any independent third party audit schemes like those noted above, the DFS direct supplying partner must provide evidence that any non-conformities have been closed out and approved by the representing or awarding body of the independent audit.

DFS would like to see supplying partners working towards internationally recognised certification schemes where appropriate, and national schemes to evidence environmental and sustainable responsibility.

1. **ISO9001** – Quality Management Systems
2. **ISO14001** – Environmental Management
3. **ISO45001** – Health and Safety Management
4. **Planet Mark** Sustainability Certification
5. **FIRA FISP** – Furniture Industry Sustainability Programme

Note:

For any independent third party audit schemes like those noted above, the DFS direct supplying partner must provide evidence that any non-conformities have been closed out and approved by the representing or awarding body of the independent audit.

DFS Trading Limited (DFS)

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 third 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 (lock & key) and sharps 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 expects 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 – Wood mill – 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.

DFS Trading Limited (DFS)

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:

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.

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, and any new additions are actioned accordingly in line with the sunset date for its ban.

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

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

DFS expects suppliers to understand our responsibilities to UK and EU REACH, and that DFS require annual declarations or sooner 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.

DFS Trading Limited (DFS)

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 do what it is designed to do, for example, 'Kills Bacteria.'
2. A product that has an added substance to deliver what it is 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 requires the technical data sheets for the Biocide before the 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 expects suppliers to understand 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.

DFS Trading Limited (DFS)

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 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:

1. **FSC** – the Forestry Stewardship Council
2. **PEFC** - the Programme for the Endorsement of Forest Certification

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

All 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.

UK General Product Safety Regulations (GPSR) and 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."

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 prove 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 on human and product safety.

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

For example: UKAS or similar (CNAS) 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 is also guidance on chemical testing by materials used and assistance for DFS suppliers to have available to arrange testing with Technical Service Providers.

As a leading national retailer, DFS core values to Think Customer, Aim High and Be Real, are very much reflective in the end-to-end product journey from design to being in use by customers.

DFS performs a formal structured risk assessment of all products being presented to the Commercial Department. This assessment considers product safety, considering existing pre-designed testing standards by the British (BSI), European (CEN) and International Standards Organisations (ISO).

In addition, and in line with DFS core values, our risk assessment process assesses potential risk in reasonable and potential misuse, where action can be taken where appropriate to reduce any risk of harm to users. Please find a copy of our report in the appendices.

It is expected that all products presented to DFS have a formal supplier risk assessment based on the risk of harm and impact this could present. Risk assessments should be presented to DFS representatives and be included in all product technical files submitted to DFS and relevant service partners specified.

DFS Trading Limited (DFS)

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:

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

DFS expects 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>

DFS Trading Limited (DFS)

Machinery Directive 2006/42/EC and Supply of Machinery (Safety) Regulations 2008 CE Marking and UKCA Marking

This is a Directive for the safe inclusion of motorised parts in electrically actuated motorised 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 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 separate copy of both of the UKCA and CE declarations of conformity, in addition, DFS declaration must also be completed 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 expects suppliers to produce the documented evidence of CE marking and UKCA marking for the United Kingdom that meets this Directive.

DFS Trading Limited (DFS)

UK and EU POPs - Persistent Organic Pollutants

Persistent organic pollutants (POPs) are organic substances that persist in the environment, accumulate in living organisms, and pose a risk to our health and the environment.

POPs are regulated worldwide by the Stockholm Convention and the Aarhus Protocol. These international treaties are implemented in the United Kingdom and European Union by the POPs Regulations.

The POPs Regulation aims to protect human health and the environment with specific control measures that:

1. Prohibit or severely restrict the production, placing on the market and use of POPs
2. Minimise the environmental release of POPs that are formed as industrial by-products
3. Ensuring stockpiles of restricted POPs are safely managed
4. Ensure the environmentally sound disposal of waste consisting of, or contaminated by POPs

Chemical substances that have been identified as POPs can be found on the following websites:

UK – <https://www.gov.uk/guidance/using-persistent-organic-pollutants-pops#list-of-pops>

EU - <https://echa.europa.eu/list-of-substances-subject-to-pops-regulation>

EU - RoHS Directive 2011/65/EC and the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012

The Restriction of the Use of Certain Hazardous Substances in Electronic and Electrical Equipment) restricts the amount of hazardous substances that can be used in the manufacture of electrical and electronic equipment (EEE).

This legislation prevents all new electrical and electronic equipment placed on the market in the UK and EU from containing Lead, Mercury, Cadmium, Hexavalent chromium, Poly-brominated biphenyls (PBB) and Polybrominated diphenyl ethers (PBDE), except in certain specific applications, in concentrations greater than the values shown within the Directives.

The additional substances are Bis (2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP).

The values have been established as 0.01% by weight per homogeneous material for Cadmium and 0.1% for the other nine substances.

DFS Trading Limited (DFS)

Electromagnetic Compatibility (EMC) Directive 2014/30/EU and Electromagnetic Compatibility Regulations 2016

The EMC legislation came into force and is aligned to the New Legislative Framework. This ensures that all electrical and electronic equipment, placed on the EU and UK markets, complies with the allowed adequate level of electromagnetic compatibility.

There are two primary objectives of the EMC legislation:

1. All electrical and electronic equipment (whether fixed installations or apparatus) that is placed on the EU or UK market must comply with the legislation requirements when it is correctly installed, maintained, and utilised for its intended purpose.
2. All fixed installations must be characterised with the application of good engineering practice.

Low Voltage Directive (LVD) 2014/35/EU and Electrical Equipment (Safety) Regulations 2016

This legislation ensures that electrical equipment within certain voltage limits provides a high level of protection for EU and UK citizens.

The legislation covers health and safety risks on electrical equipment operating with an input or output voltage of between:

1. 50 and 1000 V for alternating current
2. 75 and 1500 V for direct current

The legislation applies to a wide range of electrical equipment for both consumer and professional usage, including but not limited to:

1. Household appliances
2. Cables
3. Power supply units
4. Laser equipment
5. Certain components, e.g., fuse

Electrical legislation is to ensure the health and safety requirements are the same in products placed on the EU and UK markets.

The EU and UK **General Product Safety** legislation covers consumer goods with a voltage below 50 V for alternating current, or below 75 V for direct current. It aims to ensure that only safe consumer products are sold in the EU and UK markets.

DFS Trading Limited (DFS)

Batteries Directive 2013/56/EU and Waste Batteries and Accumulators Regulations 2009

This legislation, aimed at increased environmental performance, introduced limits of 0.0005% of mercury in batteries and accumulators and 0.002% of cadmium in portable batteries and accumulators.

The legislation sets out that the limit of 0.0005% of mercury in batteries will also apply to button cell batteries from 1st October 2015.

Batteries and accumulators that do not meet the requirements, but which were lawfully placed on the market prior to the date of application of the respective prohibitions set out by the legislation, may continue to be marketed until stocks are exhausted.

Finally, clear instructions for the safe removal and disposal arrangements of batteries should be given with every product falling within the scope, specific exemptions apply to this requirement where continuity of power is necessary for safety, performance, medical, or data integrity reasons.

The legislation is not a UKCA or CE Marking requirement, compliance is denoted by the crossed-out wheelie bin logo.

Radio Equipment Directive 2014/53/EU and Radio Equipment Regulations 2017 – (RED)

This legislation the independent safety and performance requirements for all wireless communications and radio equipment sold or used in the European Union and United Kingdom. Radio Equipment legislation covers all devices that transmit and receive radio signals including Wi-Fi and Bluetooth devices.

They cover three distinct aspects of the safety and performance of manufactured radio equipment:

1. Electrical Safety
2. Electromagnetic Compatibility (EMC)
3. Radio Performance

It is important that equipment within the scope of this Legislation must meet the essential requirements of both the [Low Voltage Directive](#) and [Electromagnetic Compatibility \(EMC\) Directive](#).

The Directive also requires equipment to be constructed for efficient use of the radio spectrum, and to avoid interference with terrestrial and orbital communications.

There are a number of ways in which manufacturers can ensure that their product complies. If harmonised BS and EN standards exist for the equipment, they may self-declare. If these do not exist, the manufacturer may have to involve a [Notified Body](#) (UK and EU) to assess the ability of the equipment to meet the essential requirements before self-certification can take place.

Products and equipment that conform to the requirements of the Regulations should carry a twin marked CE and UKCA Mark for DFS, supported by a valid EU and UK Declaration of Conformity.

DFS Trading Limited (DFS)

Gas Appliances Directive - 2016/426 and Gas Appliances (Enforcement) Regulations 2018

This legislation applies to a range of gas burning appliances that operate up to a normal temperature of 105 °C and some fittings including safety, regulating, and controlling devices and sub-assemblies.

It became mandatory from the start of 1996, therefore all gas appliances sold that fall within the scope of the legislation must be CE marked and now UKCA marked for the UK. The legislation defines gas as a fuel which is in a gaseous state at 15 °C at a pressure of 1 bar, therefore excluding appliances that run on natural gas and LPG amongst others.

Manufacturers of new products must meet protection requirements which are checked through type testing, compile a technical file, mark the product with a CE and UKCA logo and implement production quality control.

This directive requires type testing and production quality to be tested and approved by an Independent body notified as competent by EU and UK representatives. To satisfy the requirements for production quality control, manufacturers must adopt 1 of 5 different procedures that must be checked by a notified body. These procedures differ in proportion of products checked, how these are selected and whether the products themselves are checked or the production method if this can guarantee production quality control.

The legislation applies to:

1. Gas burning appliances used for heating, cooking, water heating, refrigeration, lighting and washing operating at a normal temperature of up to 105°C
2. Fittings i.e. safety, regulating or controlling devices and sub-assemblies which are separately marketed for trade use and which are intended for incorporation in appliances.

Gas is defined as any fuel in a gaseous state when at 15°C and 1 bar and therefore includes natural gas (methane) and all types of bottled LPG (propane, butane, and mixtures)

Action required by DFS supply partners and their supply chains:

In regard to all regulations and directives above, there are two key areas to evidence compliance:

Testing:

Please refer to the DFS Testing Policy. This outlines DFS exact requirements for the product supplied. In addition to DFS requirements, it is the responsibility of DFS supply partners to perform their own due diligence and auditing of all sub-contractors, suppliers, and partners in line with DFS Code of Practice and expectations.

Internal Control of Information:

Where testing is not directly required by DFS, the expectation is for all Components and Electrical Components to evidence compliance to their regulation or directive by a formal process of documentation collection that can easily be presented to DFS in a crisis.

DFS Trading Limited (DFS)

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 one product. The 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.

Components used in manufacture should have all relevant technical data sheets available. Where components are used in production with a specific purpose, it is expected that these are used to the manufacturer's instructions. In the event this is not the case, suppliers are required to justify the use and why actions against the manufacturer's instructions are in progress.

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.

Importers and Non-manufacturing Suppliers

Importers and non-manufacturing suppliers should have in place a robust supplier auditing process in place to ensure the quality of products supplied to DFS.

This should include a documented process to check products internally against the manufacturing technical data sheet, or bill of materials for the product being assessed.

A percentage of supplied products should be checked, and this is a variable depending on operations and circumstances in which this operation can be performed.

The DFS representative would decide and agree to any outcome directly with the supplying partner.

For example, a total 10% of products supplied to DFS are checked on a monthly basis, formal inspection reports are available including images.

DFS Trading Limited (DFS)

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. Storage must be clearly identified and there is no risk of cross contamination of non-UK materials.

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 of UK components
- 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 state 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 subcontracted parts are controlled and allocated to orders made.

Importers and Non-manufacturing Suppliers

Importers and non-manufacturing suppliers should have in place a robust supplier auditing process in place to ensure the full traceability of products supplied to DFS.

This should include a documented process to check product traceability internally against the manufacturing details provided by the manufacturer.

The DFS representative would decide and agree any outcome directly with the supplying partner for an appropriate level of traceability based on the supplying partner's business model.

DFS Trading Limited (DFS)

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.
- c. Suppliers and non-manufacturers should be able to explain this competently based on their auditing procedure or supplier vetting process.

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 monthly output.

DFS considers it reasonable that in low volume production cover material test certificates should be no older than 6 months for upholstery and 9 months for home products of the date of manufacture or one report per batch of interior materials used in relation to flammability testing.

Flammability, interiors, covers and finished article testing requirements are as specified in the DFS Testing Policy provided according to products supplied.

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

1. 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. Failure to meet this is a breach to the standard and labelling of BS7177 on DFS products. If this is identified, suppliers may be held accountable.

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

DFS Trading Limited (DFS)

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 expects all covers and fillings and components to have test reports for every type 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 body's signatories of the ILAC.

6.10 EVIDENCE OF A BUSINESS CONTINUITY PLAN (BCP) / CRISIS MANAGEMENT PLAN

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 if we were required to recall non-compliant foam? How many weeks of finished articles would need to be recalled? It is advisable to ensure core material batch codes are at a manageable size based on the 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 loaded in such a way that products do not get damaged in any way from factory to a DFS distribution centre (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 DFS CDCs.

The expected policy should include methods of packaging and protection, how specific pieces of furniture should be loaded and stacking lighter products on top of heavy products. These policies need to consider movement and the potential of damaging products. Containers should be checked for damage, and anything that may cause an issue to DFS products. Policies should be reviewed periodically, and version controlled.

DFS Trading Limited (DFS)

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

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

These reports 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 for at least 25 percent of the units loaded on each container.

Importers and non-manufacturing suppliers of DFS should be able to provide or request these for DFS products upon request.

These reports should be sent to the relevant Quality Manager/ or other and kept for at least 2 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:

1. How needles are stored and distributed, DFS expectation is that needles should be stored in a locked unit.
2. How broken needles are retained and recorded, DFS expectation is that broken needles are taped to a piece of paper with details noted, and formally signed off.
3. How knives, sharps and staples are accounted for and stored before and after a shift. Who has the responsibility?
4. That there are metal detection devices on site, and how often are they used and calibrated.
5. Who checks and monitors colleagues, and whether their own tooling can enter the business? DFS would expect a process is in place to search colleagues on a formal regular structure in order to reduce the risk of colleagues bringing in their own tools.
6. Documented policies should include pictures of all needle and sharp types used in the manufacturing process. The policy should be updated when new types are being used.

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:

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

The British Standards Institute (BSI) provides a public accessible standard (PAS) named PAS 7100. This presents best practice for better product recalls.

In summary, the standard assists businesses in building a product safety incident plan (PSIP) which offers a structured approach in any event of a full or part product recall.

The PAS 7100 offers best practice in line with DFS expectations, it is encouraged that all suppliers look into the standard and possibly use the standard as a model in future corporate updates.

The link to download the PAS 7100 standard: <https://www.bsigroup.com/en-GB/pas7100-supporting-better-product-recalls/>

DFS Trading Limited (DFS)

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

If DFS finds 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:

1. Contact list and communication plan including those authorised or responsible for the corrective action, including when stakeholders are advised.
2. Full details of the issue raised.
3. Risk assessment of the product, analysis, and conclusions overview.
4. Sufficient product traceability and identification of affected units.
5. Action planning of how to correct or mitigate the issue.
6. Plan detailing steps in place to ensure the issue does not occur again.
7. Controlled review of the corrective action plan to ensure it remains relevant and up to date.

DFS Trading Limited (DFS)

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

Due to the scope of this section in regard to supplier and product type, it is not possible to specify exact requirements in this COP. The auditor will assess specifics and discuss any major, minor or comments for action based around the following headings and findings.

1. Please see **appendix 9** for a comprehensive list of our expectation for process, policy, procedural and audit documentation, international certification, and evidence requirements.
2. Are product risk assessments performed in best practice, for example, the link to download the PAS 7050 standard: <https://www.bsigroup.com/en-GB/standards/pas-7050/>
3. A full demonstration of the production layout, including timelines and critical control points for risk and quality under each station of the production process
4. Quality control process for components coming into the business, and how these are stored, prepared, and allocated to production. This should include re-ticketing of batches, and assessing the risk and impact of missing batch controls
5. Documented process for the attachment of loose components. For example, FEET, ASSEMBLY INSTRUCTIONS (AIs), FIXINGS, TOOLS, and OTHERS
6. Are product improvement visual aids available in the factory? Signage and posters around the factory showing GOOD/BAD, manuals of models, frequency of training on products?
7. Documented controls on temperature and moisture content for leather, timber, and other materials. What are the max and minimum measurements, process for incorrect measurements
8. Are products signed off by senior quality controllers? Where is the checking area and is there a record of products not fit for delivery, returns following the final inspections process. DFS requires a finished article checking process, ensuring 100% of finished articles are put together, checked, and signed off. It should be documented where possible.
9. Is there a quality critical control point system throughout production? How is quality monitored? For example, is there a consequences system to accompany piece work systems or is production a time based system with quality checking time built in?
10. How are new models introduced from Research, Design and Development to full production? This should be a documented process for DFS products.
11. 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?
12. A process to monitor service parts, and used for continuous improvements?
13. Flame Retardant treated materials should be clearly separate to non-flame retardant materials to avoid incorrect selection. A different storage area is required, or fully satisfied justification and evidence the current system has no gaps for error.

DFS Trading Limited (DFS)

6.17 BUSINESS ON-BOARDING PROCESSES OF DFS DIRECT PARTNERS, COMPONENT SUPPLIERS AND SUB-CONTRACTORS

Direct DFS supplying partners regardless of the business model, product range and operation, has a direct responsibility to ensure that all their business partners are in line with DFS expectations.

DFS view the following as a responsible and reasonable expectation:

1. All direct supplying partners should have in place a formal auditing process of suppliers, showing a documented process of on-boarding and expectations.
2. For Manufacturers, Agents, Importers and Wholesalers - It is required that all ***finished article manufacturers*** are signatories of the DFS COP. A signed copy of the Code of Practice will be required from your partners.

DFS direct suppliers are required to have a formal annual audit in place, this can be of their own making if in line with DFS COP, or DFS COP documentation can be used.

It is expected that all finished article manufacturers meet requirements on the DFS pre-audit questionnaire (PAQ) and factory audit checklists, either own documentation if equal to DFS expectations, or DFS COP documentation can be used.

Key documentation expected include minimum of SMETA 2 pillar audits with fully closed corrective actions where required, FSC certified or Chain of Custody for FSC timber used, OEKO-TEX Step and LWG evidence to textiles and leather, and ISO certification where possible.

Finally, it is important that DFS corporate policy is understood by the entire supply chain, therefore, a requirement is that full documented evidence is available to DFS at the pre-audit questionnaire stage.

3. There is no expectation for component suppliers of DFS direct suppliers to be signatories of the COP. There is an expectation that component suppliers are formally audited in line with DFS Code of Practice, and DFS supplying partners are expected to show a measured approach to the selection of component and material suppliers.

For all scenarios above, DFS supplying partners are expected to have the following systems in place:

1. **Selection criteria process** – This should show the selection criteria and structured approach to selecting a manufacturer, component supplier or sub-contractor, and the decision process journey.
2. **Disciplinary action process** – This should be linked to the auditing and inspection process. This should include how partners are held accountable dependent on the matter severity.

Please refer to **appendix 11 and 12** for a list of expectations in regard to key documentation, certification, and auditing responsibilities of DFS supply partners.

DFS Trading Limited (DFS)

7.0 OBLIGATIONS

By participating in the DFS auditing programme, all supplying partners 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 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.

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:

1. Code of Practice (including Appendices)
2. Pre-Audit Questionnaire and Audit Plan
3. DFS Audit Guidance Documentation
4. DFS COP Update Control Documentation

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

DFS Trading Limited (DFS)

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 Head of Quality on the details below within one working week of receiving the final audit report.

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

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

At the end of the investigation, DFS 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

Head of Quality – Home and Upholstery (external supply partners):

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, 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 with DFS policies, processes, and procedures in the Appendices below, and that a signatory of the DFS Code of Practice is in accordance with the latest version published.

Supplying Partner Name:

Name:

Position:

Date:

Signature:

Company stamp (Asia):

On behalf of DFS:

Quality Manager / or other:

Date Received:

Signature:

On behalf of DFS:

Head of Quality / or other:

Sign off Date:

Signature:

DFS Trading Limited (DFS)

APPENDICES:

APPENDIX 1 – DFS Group Policies

DFS is committed to carrying out its business fairly, honestly and openly and we expect the same high standards of integrity from all of our employees, suppliers and partners.

Please click on the links below which take you directly to the titled DFS Group Policies. Suppliers are strongly encouraged to regularly read and understand all DFS Group Policies.

All policies links below can be found on the DFS Group corporate website on the following address:
<https://www.dfscorporate.co.uk/governance/policies-statements>

[Anti-bribery Policy](#)

[Anti-slavery and human trafficking Policy](#)

[Environmental Policy](#)

[Group Code of Conduct](#)

[Group Human Rights Policy](#)

[Group Leather Policy](#)

[Gender Pay Gap statement](#)

[Group Timber Policy](#)

[Health and Safety Policy](#)

[Sustainable Sourcing Policy](#)


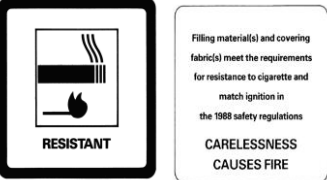
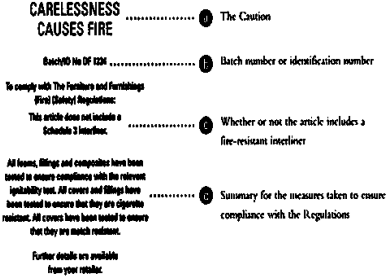

[Whistleblowing Policy](#)

DFS Trading Limited (DFS)

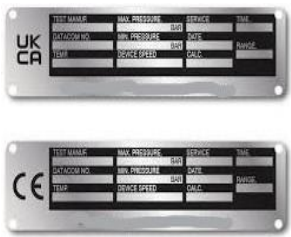



APPENDIX 2 – PRODUCT AND PACKAGING LABEL SPECIFICATION

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




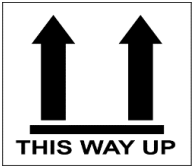



A label is required on every product, finished article or module if the product meets the following criteria:

Product Regulatory Labelling Requirements for All Seating, Bed Frames, Headboards and Mattresses:	
	<ol style="list-style-type: none"> 1. The reference code must be the same as referenced to DFS Buyers, must also include the DFS name where possible 2. Attached to the outer packaging in a larger format 3. Durable, clear to read and not easily removable 4. Text font must be noticeable and stand out 5. Must be attached to every module of a finished article for NPD 6. The label should be sewn in or glued and stapled in a position where removal is by causing damage to the product itself
	<ol style="list-style-type: none"> 1. Where upholstered finished articles, part upholstered or non-upholstered articles sold with any soft furnishings over 60cm by 60cm, has no flame-retardant interliner, and where the outer cover is both cigarette and match tested to schedule 4 and 5 parts 1. All display labels must be able to turn and see both sides and be attached to the main article. The example to the left is not to scale.
	<ol style="list-style-type: none"> 1. The schedule 7 permanent label must include all the relevant information in accordance with the finished article type itself. This label holds key detail in the event of a recall, or where consumers need to know the level of fire protection. The permanent label must be robust, and not wear over the life expectancy of the product. It must be attached so that it cannot be removed without causing damage to the finished article. 2. The label must include the Caution, batch / Identity code, whether it includes an inter-liner and a Summary for how testing meets the regulations. The example to the left is not to scale.
	<ol style="list-style-type: none"> 1. Permanent Label – Domestic Mattresses and Divan Bases only BS7177 is a standard, not a test method. To label as below, the standard particulars must be met. Fillings must meet the UK FFFSR and there is a test frequency regarding the mattresses manufactured in each period. Supplying partners must meet the requirements of BS7177 for DFS products, failure to do so may result in immediate withdrawal of products from DFS product portfolio. 2. Note, the label must be sewn into the mattress in a visible position. It is advised that mattresses have the manufacturing date and textile composition on the reverse of the label if not labelled separately. The example to the left is not to scale.

DFS Trading Limited (DFS)

	<ol style="list-style-type: none"> Electronically Operated Motion Furniture – Name Plate In line with the machinery directive, manufacturers are required to UKCA and CE mark machinery. This includes electronically assisted machinery. DFS requires both CE and UKCA markets for its products, the name plate must include the manufacturer’s name, address, manufacturing date, batch identity as a minimum requirement. The label example to the left is for example purpose only, the name plate does not have to be metal, please confirm with your DFS Quality Manager. The example to the left is not to scale.
	<ol style="list-style-type: none"> All textile products must have the textile/fibre compositions on a label. This includes upholstered seating, soft furnishings, bed frames and mattresses. All labels with the composition must be accessible and permanent. The image left is for example purposes only.
Product Awareness Labelling Requirements for Static and Motion Seating (including Sofa Beds):	
	<ol style="list-style-type: none"> For all DFS finished articles and modular pieces Excluding products categorised as DFS Home Range One (1) label to be fixed to every modular piece or finished article Label size, a minimum of 6cm L and W Text must be readable Label to be sewn in next to the FR fire label batch label <p style="text-align: center;">The label text reads:</p> <p style="text-align: center;">Imported or supplied by, or on behalf of: DFS Trading Limited 1 Rockingham Way Adwick le Street Doncaster DN6 7NA United Kingdom</p>
	<ol style="list-style-type: none"> For all motion upholstered seating only, including Home Range where appropriate This double sided swing tag should be present on all types of Motion Seating supplied to DFS, clearly visible in store examples and on customer ordered products 12cm (L) and 5cm (W) is the minimum required size

DFS Trading Limited (DFS)

	<ol style="list-style-type: none"> 1. For all visible motion components, including Home Range where appropriate 2. Including recliner arms / on finger guards, moving headrests, drop down tables, adjustable hard line products, any areas with visible gaps or similar risk areas of any product type
Packaging Labelling Requirements for Seating, Beds and Mattresses:	
	<ol style="list-style-type: none"> 1. All products weighing 50KG and over
	<ol style="list-style-type: none"> 1. All products weighing 50KG and over 2. Any products that are difficult to handle safely
	<ol style="list-style-type: none"> 1. For all packaging types, to advise loaders and unloaders
	<ol style="list-style-type: none"> 1. All motion furniture, recliners, and sofa beds 2. All products with FEET attached. E.g., FOOTSTOOLS
	<ol style="list-style-type: none"> 1. Do not use open blades around DFS products 2. Do not open with blades to avoid product damage
	<ol style="list-style-type: none"> 1. To be placed on all models and modules where arms are removable 2. This label is to assist both internal and external teams

APPENDIX 3 – CHEMICAL AND SUBSTANCES AWARENESS

RESTRICTED SUBSTANCES AWARENESS IN FURNITURE											
(Key - LTH-Leather, NT-Natural Textile, ST-Synthetic Textile, PLS-Plastic, RUB-Rubber, WD-Wood, MET-Metallic Trim, MIX-Mixture/Combination of Substances)											
Substance	Legislation	Requirement	LTH	NT	ST	PLS	RUB	WD	MET	MIX	
Arsenic compounds	UK&EU REACH - Annex XVII(17) - Entry 19	< 1mg/kg (shall not be used in the preservation of wood)						●		●	
Asbestos	UK&EU REACH - Annex XVII(17) - Entry 6	Use prohibited			●	●					
Azo colourants	UK&EU REACH - Annex XVII(17) - Entry 72	< 30mg/kg (see Appendices)		●	●						
	UK&EU REACH - Annex XVII(17) - Entry 43	< 30mg/kg of each amine for dyed products in direct contact with the skin (see Appendices)	●	●	●						
Pentachlorophenol (PCP) and its salts and esters	UK&EU REACH - Annex XVII(17) - Entry 22	< 1000mg/kg in substances or mixtures									
	Persistent Organic Pollutants Regulation (EU) - (POPs)	< 5mg/kg (see Appendices)	●	●				●		●	
Phenylmercury Compounds (including ethylhexanoate, acetate, neodecanoate, octanoate and propionate)	UK&EU REACH - Annex XVII(17) - Entry 62	<0.01% by weight of Mercury				●					
Tetrachlorophenol (TeCP)	No direct legislation, but commonly advised	5mg/kg guidance limit									
Trichlorophenol (TCP)			●	●			●		●		
Orthophenylphenol (OPP)			< 500mg/kg guidance limit								
Nickel	UK&EU REACH - Annex XVII(17) - Entry 27	< 0.5µg/cm2/week for products in prolonged contact with the skin							●		
									●		
			LTH	NT	ST	PLS	RUB	WD	MET	MIX	

DFS Trading Limited (DFS)

			LTH	NT	ST	PLS	RUB	WD	MET	MIX
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)	●							
Phthalates	UK&EU REACH - Annex XVII(17) Entries 51 and 52 (see also UK&EU 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 Appendices)								
	UK&EU REACH - Annex XVII(17) Entry 72	< 0.1% sum of the 5 phthalates listed in Appendices or in other entries of REACH Annex XVII				●				
	UK&EU RoHS	< 0.1% of DBP, DEHP, BBP and DIBP								
Cadmium	UK&EU REACH - Annex XVII(17) Entry 23	< 100mg/kg (plastics/rubbers)				●	●			
		< 1000mg/kg (paint)						●	●	
Total Lead	UK&EU REACH - Annex XVII(17) Entry 63	≤ 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 Appendices)				●	●			
	UK&EU REACH - Annex XVII(17) Entry 72					●				
Dimethylfumarate (DMFu)	UK&EU REACH - Annex XVII(17) Entry 61	< 0.1mg/kg of product or part of product	●							
				●	●					
Organostannic compounds (organotins)	UK&EU REACH - Annex XVII(17) Entry 20	< 0.1% (see Appendices)	●	●	●	●	●			●
Formaldehyde	UK&EU REACH - Annex XVII(17) Entry 72	< 75mg/kg - Textiles, Leather and Wood	●	●	●			●		
			LTH	NT	ST	PLS	RUB	WD	MET	MIX

DFS Trading Limited (DFS)

			LTH	NT	ST	PLS	RUB	WD	MET	MIX
Extractable Chromium	UK&EU General Product Safety	< 250mg/kg	●							
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		●	●					
			●							
Disperse dyes	UK&EU REACH - Annex XVII(17) Entry 72	< 50mg/kg of Disperse Blue 1, Basic Red 9 and Basic Violet 3			●					
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 Appendices)	●	●	●					●
PFOA (perfluorooctanoic acid) and its salts, and related compounds	UK&EU REACH - Annex XVII(17) Entry 68	< 25µg/kg sum of PFOA and its salts in articles < 1mg/kg PFOA related compounds < 25µg/kg sum of PFCAs and their salts < 260µg/kg sum of PFCA related substances (See appendices)								
PFCAs (perfluorooctanoic acid) their salts and precursors										
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 guidance limit for articles < 100mg/kg for NPE only	●	●	●					●
Octyl phenol (OP) and octyl phenol ethoxylates (OPE)	No direct legislation, but commonly advised	< 1000mg/kg in mixtures < 100mg/kg for articles	●	●	●					●
C10 to C13 Chloroalkanes, SCCP (short chained chlorinated paraffins)	Persistent Organic Pollutants Regulation (EU) - (POPs) - (also UK&EU REACH candidate list)	< 1% in substances or mixtures < 0.15% in articles (see Appendices)	●		●	●	●			●
			LTH	NT	ST	PLS	RUB	WD	MET	MIX

DFS Trading Limited (DFS)

			LTH	NT	ST	PLS	RUB	WD	MET	MIX
Heavy metals (Pb, Cd, Hg & Cr VI)	European Packaging Directive 2004/12/EC	< 100mg/kg sum of Pb,Cd,Hg and Cr VI				●				
	UK&EU RoHS	Hg < 1000mg/kg - Cr VI < 100mg/kg 1000mg/kg - Cd < 100mg/kg Pb < 1000mg/kg	●	●	●	●	●	●	●	
Brominated flame retardants	UK&EU REACH - Annex XVII(17) - Entry 67	< 1000mg/kg of Decabromodiphenyl ether (Deca BDE)	●	●	●	●	●	●		
	UK&EU REACH - Annex XVII(17) - Entry 45	< 1000mg/kg of Octabromodiphenyl ether (Octa BDE)								
	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 Appendices)	●	●	●	●	●	●	●	
	UK&EU REACH - Annex XVII(17) - Entry 8 (UK&EU RoHS)	< 1000mg/kg of Polybrominated biphenyls (PBB) and Polybrominated diphenyl ethers (PBDE) (see Appendices)	●	●	●	●	●	●	●	
1-methyl-2- pyrrolidone (NMP)	UK&EU REACH - Annex XVII(17) - Entry 71 (see also UK&EU REACH candidate list)	< 0.3% in mixtures	●							●
	UK&EU REACH - Annex XVII(17) - Entry 72 (see also UK&EU REACH candidate list)	< 3000mg/kg		●	●	●				
Toluene	UK&EU REACH - Annex XVII(17) - Entry 48	<0.1% in adhesives and spray paints on sale								●
Tris (aziridinyl) phosphin oxide	UK&EU REACH - Annex XVII(17) - Entry 7	Use prohibited								
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		●	●					
			LTH	NT	ST	PLS	RUB	WD	MET	MIX

DFS Trading Limited (DFS)

			LTH	NT	ST	PLS	RUB	WD	MET	MIX
Dimethylformamide (DMFa)	UK&EU REACH - Annex XVII(17) - Entry 72 UK&EU REACH - Annex XVII(17) - Entry 76 (Also see UK&EU REACH candidate list)	< 3000mg/kg (<1000mg/kg recommendation for PU materials)		●	●	●				
Dimethylacetamide (DMAC)	UK&EU REACH - Annex XVII(17) - Entry 72	< 3000mg/kg		●	●	●				
Benzene	UK&EU REACH - Annex XVII(17) - Entry 72	< 5mg/kg		●	●	●				
Chlorotoluenes	UK&EU REACH - Annex XVII(17) - Entry 72	< 1mg/kg of p-chlorobenzotrighloride, benzotrighloride or benzyl chloride		●	●	●				
Creosotes, tar oils and distillates	UK&EU REACH - Annex XVII(17) - Entry 31	Use prohibited						●		●
Cyclohexane	UK&EU REACH - Annex XVII(17) - Entry 57	< 1mg/kg in neoprene based adhesives for general sale								●
Quinoline	UK&EU REACH - Annex XVII(17) - Entry 72	< 50mg/kg		●	●					
Pesticides	Persistent Organic Pollutants Regulation (EU) - (POPs)	See Appendices	●	●				●		

END

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 updated in 5th January 2023. Please refer to DFS Testing Policy for specific product testing requirements.

NOTE: This document acts only as guidance to the UK&EU REACH declaration that must be complete by all supplying partners of DFS. Please refer to the DFS Testing Policy for specific product requirements, however, any further technical information or clarification regarding test methods, can be discussed with your ISO17025 accredited chemical testing laboratory.

NOTE: Plastic includes both coated textile and leather. Mixtures are a combination on substances, e.g., finishing treatments like stain, water repellent or polishes.

NOTE: All Upholstery and Home suppliers must be able to demonstrate compliance to the UK and EU REACH regulations by documented evidence like test reports. All reports must not exceed 2 years from the date of request.

(POPs) Persistent Organic Pollutants Regulation – Restrictions for Industrial Chemicals

Substance	CAS Number	Maximum allowable concentration in Articles
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)

(POPs) Persistent Organic Pollutants Regulation - 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	
Endosulfan	115-29-7, 959-98-8 - 33213-65-9	
Pentachlorophenol	87-86-5	<5mg/kg

Restricted Brominated Flame Retardants in REACH - Entry 8		
<u>Substance</u>	<u>CAS Number</u>	<u>Maximum allowable concentration in Articles</u>
3-bromobiphenyl	2113-57-7	None detected - shall not be used in textile articles intended to come in contact with the skin.
Decabromo-1, 1'-biphenyl	13654-09-6	
4-bromobiphenyl	92-66-0	
4,4'-dibromobiphenyl	92-86-4	
Hexabromo-1, 1'-biphenyl	36355-01-8	
Nonabromo-1, 1'-biphenyl	27753-52-2	
Tetrabromo (tetrabromophenyl) benzene	27858-07-7	
Polybrominatedbiphenyls (except hexabromo-biphenyl)	59536-65-1	

Restricted Brominated Flame Retardants in REACH and/or RoHS 2	
<u>Flame retardant substances</u>	
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

Please refer to EHCA and H&S Executive for further information.

APPENDIX 4 – DFS TEXTILE PERFORMANCE GUIDANCE

<u>CATEGORISATION FOR DFS PRODUCTS</u>	<u>IN RELATION TO DFS TEXTILES USED</u>
Soft furnishings only. This allows design-led decorative items to be approved if appropriate. (Excluding Cushions over 60cm by 60cm)	Not acceptable to DFS unless assessed and approved.
All categories of furniture. Sofa’s, chairs, stools, bed frames, headboards and other finished articles similar like children’s and outdoor. (Excluding Mattresses and Divan Bases)	Minimum requirement for all DFS visible upholstery covers is General Domestic, however, High Domestic is desirable.
	Minimum requirement for DFS Resilience range.

<u>TEST DESCRIPTION</u>	<u>LOW Domestic</u>	<u>GENERAL Domestic</u>	<u>HIGH Domestic</u>	<u>GENERAL Contract</u>	<u>SEVERE Contract</u>
Tensile Strength (ex Knit and N-Wov)	C	C	B	B	B
Tear Strength (ex Knit and N-Wov)	E	D	C	C	C
Seam Slippage (ex Knit and N-Wov)	C	B	A	A	A
Burst Strength (Knit and N-Wov only)	B	B	B	B	B
Abrasion – All Flat Woven (ex Weaves)	B	B	B	B	A
Abrasion – Figured Weaves (Chenille)	B	B	B	B	A
Abrasion – Non-woven, Knitted, Flocked, All Pile Types, Raised	C	C	B	B	B
Pilling (ALL textiles)	C	C	B	B	B
C/F to Light (ALL textiles)	B	B	B	B	A
C/F to Rubbing (Dry) - (ALL textiles)	B	B	B	B	B
C/F to Rubbing (Wet / Staining) - (ALL textiles)	B	B	B	B	B
C/F to Water - (ALL textiles)	A	A	A	A	A

Requirements based on BS EN 14465:2003 for Textiles and BS 2543:2004 for performance classifications.

TEST DESCRIPTION	STANDARD	UNITS	A	B	C	D	E
Tensile Strength (ex Knit and N-Wov)	BS EN ISO 13934-1	Newton	≥600N	≥400N	≥350N	≥250N	
Tear Strength (ex Knit and N-Wov)	BS EN ISO 13937-3	Newton	≥40N	≥30N	≥25N	≥20N	≥15N
Seam Slippage (ex Knit and N-Wov)	BS EN ISO 13936-2	MM	<4mm	<6mm	<8mm		
Burst Strength (Knit and N-Wov only)	BS EN ISO 13938-1	kPa	≥600	≥400	≥200		
Abrasion – All Flat Woven (ex Weaves)	BS EN ISO 12947-2 (See appendices)	Rubs (000)	40,000	30,000	25,000	20,000	15,000
Abrasion – Figured Weaves (Chenille)	BS EN ISO 12947-2 (See appendices)	Rubs (000)	40,000	30,000	20,000	15,000	12,000
Abrasion – Non-woven, Knitted, Flocked, All Pile Types, Raised	BS EN ISO 12947-2 (See appendices)	Rubs (000)	30,000	25,000	25,000	20,000	15,000
Piling Resistance (2,000 RUBS)	BS EN ISO 12945-2	Grade 1-5 (high)	≥4-5	4	3-4		
C/F to Light	BS EN ISO 105-B02	Grade 1-8 (high)	≥6	≥5	≥4		
C/F to Rubbing (Dry)	BS EN ISO 105-X12	Grade 1-5 (high)	≥4-5	4	3-4		
C/F to Rubbing (Wet)	BS EN ISO 105-X12	Grade 1-5 (high)	≥3-4	3	2-3		
C/F to Water (Colour)	BS EN ISO 105-E01	Grade 1-5 (high)	≥4	3-4			
C/F to Water (Staining)	BS EN ISO 105-E01	Grade 1-5 (high)	≥3-4	3			

TEXTILE BREAKDOWN.

Type of Fabric	Breakdown Point (End Point)
WOVEN (WITHOUT PILE)	2 THREADS COMPLETELY BROKEN – OR - FULLY WORN OFF AREA
KNITTED (WITHOUT PILE)	1 THREAD COMPLETELY BROKEN – OR - FULLY WORN OFF AREA
PILE – CUT WOVEN	2 THREADS COMPLETELY BROKEN – OR - FULLY WORN OFF AREA
PILE – CUT KNITTED	1 THREAD COMPLETELY BROKEN – OR - FULLY WORN OFF AREA
PILE - - CHENILLE	2 THREADS COMPLETELY BROKEN – OR - FULLY WORN OFF AREA
PILE – UNCUT	1 THREAD COMPLETELY BROKEN – OR - FULLY WORN OFF AREA
RAISED – WOVEN	2 THREADS COMPLETELY BROKEN
RAISED – KNITTED	1 THREAD COMPLETELY BROKEN
FLOCKED	FULLY WORN OFF AREA
NON-WOVEN	HOLE IN THE FABRIC

Abrasion test intervals: Every 3,000 rubs.

Colour change grading for abrasion: The colour change grade must meet the same requirement detail in the **C/F to Rubbing (Dry)** as noted above after the first interval of 3,000 rubs.

Example: Woven fabric to 30,000 cycles must have no more than 2 threads broken at 30,000 rub end point, and inclusive of 10 intervals the first resulting in a grade 4 colour change to be labelled a General Contract performance level.


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APPENDIX 5 – REGULATORY, STRUCTURAL, SAFETY, AND PERFORMANCE TESTING GUIDANCE




The below is a list of pre-designed practices and test methods managed and recognised by DFS to encourage supply partner product safety due diligence.

Not all pre-designed test methods are in this appendix and in some cases DFS may request or not request other test methods where appropriate.

For more specific product testing requirements, *please refer to the DFS Testing Policy*.

UK REGULATORY and EU DIRECTIVE DECLARATIONS REQUIRED:	
DFS Chemical and Substances Declaration (UK and EU)	Signed documents required annually or 6 months.
DFS Declaration of Conformities (UK and EU)	Signed documents required annually or 6 months.
UK REGULATORY and EU DIRECTIVE - TEST REPORTS REQUIRED FOR RELEVANT COMPONENTS:	
RoHS - Hazardous Substances EMC - Electromagnetic Compatibility LVD - Low Voltage RED – Radio Equipment GAS – Gas Appliances Joint CE and UKCA markings – For example only 	Test report required for each component. New test reports are required for new suppliers or component composition changes.
UK REGULATORY - FIRE PROTECTION REQUIREMENTS FOR ALL DOMESTIC UPHOLSTERY:	
INTERIORS - FOAM	
Polyurethane (PU)	Schedule 1 - Part 1
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)	
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


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<p>COVERS - MATCH TEST</p>	
<p>Visible and Loose covers – FR and Non-FR treated</p>	<p>Schedule 5 - Part 1</p>
<p>Non-Visible covers – FR and Non-FR treated</p>	<p>Schedule 5 - Part 3</p>
<p>DISPLAY LABEL</p>	
<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 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 do not have fire barriers. Visible covers must have schedule 4 and 5 part 1 test reports.</p> <div data-bbox="890 510 1359 743" style="border: 1px solid black; padding: 10px; margin: 10px 0;">  <div style="border: 1px solid black; padding: 5px; margin-left: 10px;"> <p>Filling material(s) and covering fabric(s) meet the requirements for resistance to cigarette and match ignition in the 1988 safety regulations</p> <p>CARELESSNESS CAUSES FIRE</p> </div> </div> <p>Display label for all upholstered products that do 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 style="text-align: center; margin: 10px 0;">  </div> <div style="text-align: center; margin: 10px 0;">  </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 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 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>
<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.</p> <p>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.</p> <p>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.</p>	

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<p>Label Requirements.</p> <ul style="list-style-type: none"> • Mattresses, all depths and sizes • Sofa bed mattresses • Mattresses toppers • Divan Bases <p>Test standard: BS 7177: 2008</p> <p>Test rating: For domestic use (low hazard)</p> <p>Manufacturing date: On the reverse of the label</p> <p>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.</p>	 <p>Note: The mattress's permanent label must be sewn into products and not easily removed.</p>
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>Safety Requirement for rechargeable batteries. Transportation Testing for Lithium Batteries and cells.</p>	<p>BS EN 62133-1:2017 Part 1 - Nickel Systems</p> <p>BS EN 62133-2:2017 Part 2 - Lithium Systems</p> <p>EN 62133 UN38.3</p>
SEATING :	
<p>Seating (Domestic) Strength, durability, and safety. Requirements for domestic seating</p>	<p>BS EN 12520:2015 All forms of domestic and occasional seating. (DFS Home Seating Only)</p>
<p>Seating (Non-domestic) Strength, durability, and safety. Requirements for non-domestic seating</p>	<p>BS EN 16139:2013 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 users where possible.</p> <p>BS EN 13759:2012 (to 110kg user, 20,000 cycles to pass) Note: Test to 160kg users where possible.</p>

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Furniture - Electrically operated furniture - Stability, strength, durability and mechanical safety requirements	EN 17684
Domestic furniture. Operating mechanisms for seating and sofa-beds. Test methods Domestic furniture. Operating mechanisms for seating and sofa-beds. Test methods	BS EN 1725:1998 BS EN 13759:2012
Domestic Office Seating. Office work chair. Safety requirements	BS EN 1335-2:2018 (Gas lift seating only)
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 581-2 & 3:2017 Outdoor – Domestic Requirements Camping – Camping Requirements 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 above where applicable, including compliance to the Furniture and Furnishings (Fire Safety) Regulations.</p> <p>Outdoor seating may include, but not limited to:</p> <ol style="list-style-type: none"> 1. Camping Chairs, Stools and Beds 2. Outdoor Domestic Chairs, Swing Seats and Hammocks 3. Outdoor Recliners/Sunbeds <p>Products that can be stored or used in an enclosed space, must meet the requirements above.</p>	
SOFT FURNISHINGS: (including Pet Beds)	
<p>All upholstered soft furnishings or finished articles regardless of product purpose must meet the testing and labelling requirements in accordance with the Furniture and Furnishings (Fire Safety) Regulations 1988. This is DFS policy.</p> <p>This includes all outdoor upholstery that can be stored in a dwelling, and upholstered Pet Products.</p>	

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BED FRAMES AND MATTRESSES (INCLUDING UPHOLSTERED AND MECHANICAL) :	
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
CLEANLINESS OF MATTRESSES FILLING MATERIALS	
Mattresses and Toppers. Cleanliness of fillings and stuffing's for bedding, upholstery, and other domestic articles - Specification for fillings and stuffing's other than feather and/or down	BS 1425: Part 1: 1991
Mattresses and Toppers. Feather and down. Hygiene and cleanliness requirements	EN 12935:2001
GLASS IN FURNITURE :	
Glass in Furniture. Thermally toughened soda lime silicate safety glass. Definition and description. (Glass fragmentation)	BS EN 12150-1:2015+A1:2019 Note: All tables made of, or including glass must include this test in addition to the above
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 under 600mm (60cm) in height All indoor tables over 600mm (60cm) in height
Outdoor furniture (Domestic and Camping) Seating and tables for camping, domestic and contract use. General safety requirements	BS EN 581-1:2017 All Requirements
Outdoor furniture (Domestic and Camping) Seating and tables for camping, domestic and contract use. Mechanical safety requirements for tables	BS EN 581-3:2017 Domestic - Domestic Requirements Camping - Camping Requirements
Corrosion of metals and alloys. Accelerated cyclic test with exposure to acidified salt spray, dry and wet conditions	BS EN ISO 16151:2018 All domestic outdoor and camping furniture if applicable.

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<p>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 flammability testing above.</p>	
<p>Adjustable Tables and Desks. Worktables. Safety, strength, and durability requirements</p>	<p>BS EN 527-2:2016+A1:2019</p>
<p>Adjustable Tables and Desks. Worktables and desks. Methods of test for the determination of the stability and the mechanical strength of the structure</p>	<p>BS EN 1730:2012 (referenced in the above)</p>
<p>SIDEBOARDS, STORAGE FURNITURE, AUDIO FURNITURE :</p>	
<p>Domestic and kitchen storage units and kitchen-worktops. Safety requirements and test methods</p>	<p>BS EN 14749:2016 + A1:2022 (Safety - domestic only)</p>
<p>Domestic and non-domestic storage furniture. Test methods for the determination of strength, durability, and stability</p>	<p>BS EN 16122:2012 (Domestic only)</p>
<p>Strength and stability of furniture. Domestic and contract storage furniture. Performance requirements</p>	<p>BS 4875-7:2006 Test level 3 – General domestic for all DFS furniture</p>
<p>Audio/video, information, and communication technology equipment. Safety requirements</p> <p>Note: Only if applicable. DFS approval required</p>	<p>BS EN IEC 62368-1:2020+A11:2020 (Safety requirements only)</p> <p>Note: TV, electronic and gaming units only</p>
<p>Durability and Performance. Cabinet and tables – all materials Specification for the performance requirements for cabinet furniture.</p>	<p>BS 6250-3:1991 Domestic and contract furniture. General level required.</p>
<p>Mirrors - SATRA Test Method for Mirrors</p> <p>OR,</p> <p>Mirrors - FIRA Retail Quality Group – Glass / Mirror requirements</p>	<p>This includes:</p> <ol style="list-style-type: none"> Humidity and temperature soak tests for adhesion / Wall hanging assessment / Impact assessment / General safety assessment (sharp edges etc) <p>FIRA FRQG G0001: 2017</p>
<p>Note: Storage Units, Sideboards and Storage Units may include, but not limited to:</p> <ol style="list-style-type: none"> Wardrobes / Chest of Drawers or Bedside Drawers / Pivoted Door Unit with Shelves / Sliding Door/Flap Unit Wall Mounted Cabinet / TV Units without glass / TV Units with glass / Wall Units / With or without Mirrors or Glass 	

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KIDS GENERAL SAFETY REQUIREMENTS	
Children's Domestic Furniture - General safety requirements. *Fira International only	FIRA/FRQG C001: 2021 (This test standard references all applicable safety requirements below)
Safety of toys: Part 1: Mechanical and physical properties	BS EN 71-1: 2014+ A1:2018
Safety of toys: Part 2: Flammability	BS EN 71-2: 2020
Safety of toys: Part 3: Migration of certain elements	BS EN 71-3: 2019 + A1: 2021
Safety of toys: Part 8: Activity toys for domestic use	BS EN 71-8: 2018
Safety of toys. Part 9. Organic chemical compounds. Requirements	BS EN 71-9: 2005 + A1: 2007
Wood fibreboards. Definition, classification, and symbols.	BS EN 316: 2009
Fibreboards. Specifications. General requirements	BS EN 622-1: 2003
Fabrics for apparel. Detailed procedure to determine the burning behaviour	BS EN 1103: 2005
Textiles. Determination of formaldehyde. Free and hydrolysed formaldehyde (water extraction method)	BS EN 14184-1: 2011
KIDS SEATING	
Children's Furniture. Seating for children. Safety requirements and test methods	BS EN 17191:2021
Furniture – Seating – Test methods for the determination of strength and durability	BS EN 1728: 2012
Domestic furniture – Seating – Determination of stability	BS EN 1022: 2005 / 2018
Furniture – Chairs and tables for educational institutions – Part 2: Safety requirements and test methods	BS EN 1729-2: 2012 + A1: 2015
Children's highchairs: Part 1: Safety Requirements and Test Methods	BS EN 14988:2017+A1:2020
KIDS TABLES AND DESKS	
Furniture - Children's Domestic Furniture - Tables and desks – Requirements for strength, stability, and durability. *Fira International only	FIRA/FRQG C003: 2021 (This test standard references all applicable requirements below)
Tables – Test methods for the determination of stability, strength, and durability	BS EN 1730: 2012

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KIDS STORAGE FURNITURE	
Furniture - Children's domestic furniture – Storage furniture – Requirements for strength, stability, and durability. *Fira International only	FIRA/FROG C004: 2022 (This test standard references all applicable requirements below)
Domestic and kitchen storage units and worktops. Safety requirements and test methods	BS EN 14749: 2016 *Most appropriate for the product design
Domestic and non-domestic storage furniture — Test methods for the determination of strength, durability, and stability	BS EN 16122: 2012 *Most appropriate for the product design
Strength and stability of furniture. Domestic and contract storage furniture. Performance requirements	BS 4875-7: 2006 *Most appropriate for the product design
KIDS COTS AND BEDS	
Children's furniture. Children's cots and folding cots for domestic use Safety requirements	BS EN 716-1:2017
Children's furniture. Mattresses for cots and cribs. Safety requirements and test methods	BS EN 16890:2017 + A1:2021
Children's furniture. Children's cots and folding cots for domestic use Test Methods	BS EN 716-2:2017
Children's furniture. Cribs. 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)
Mattresses and Toppers. Cleanliness of fillings and stuffing's for bedding, upholstery, and other domestic articles - Specification for fillings and stuffing's other than feather and/or down	BS 1425: Part 1: 1991
Mattresses and Toppers. Feather and down. Hygiene and cleanliness requirements	EN 12935:2001

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GLASS IN KIDS FURNITURE :	
<p>Glass in Furniture. Thermally toughened soda lime silicate safety glass. Definition and description</p>	<p><u>DFS will not accept any form of glass or glass mirrors in products sold at any DFS point of sale.</u></p> <p>GSC Quality and Compliance Department.</p>
SOFT FURNISHINGS: (including Toy Play Value)	
<p>All upholstered soft furnishings or finished articles regardless of product purpose must meet the testing and labelling requirements in accordance with the Furniture and Furnishings (Fire Safety) Regulations 1988. This is DFS policy.</p> <p>Any soft furnishings with any form ‘play value’ that a child under 12 years of age can place in their mouth, must meet the relevant parts and clauses of EN 71 for the specific item. Where this is the case, the DFS Quality Manager will risk assess the case appropriately.</p> <p style="text-align: center;">Any loose or removable, or included parts to children’s furniture that has a primary play value, this would be classed as a toy and treated accordingly in regard to testing!</p>	
FLOOR COVERINGS :	
<p>Textile floor coverings. Jute carpet backing fabric. Specification</p>	<p>ISO 11860:1999</p> <p>Note: Specification Jute backing only.</p>
<p>Resilient floor coverings. Polyvinyl chloride (PVC) floor coverings with foam layer. Specification</p>	<p>BS EN 651:2011</p> <p>Note: Specification PVC coverings only.</p>
<p>Resilient, textile and laminate floor coverings. Classification</p>	<p>ISO 10874:2009</p> <p>Note: Specification PVC coverings only.</p>
<p>Textile floor coverings. Classification of machine-made rugs and runners</p>	<p>BS EN 14215:2018</p> <p>Note: Machine-made (woven, tufted, knitted, needled, flocked, bonded, hand-tufted) rugs and runners, including a classification according to use intensity and luxury.</p> <p>This European Standard is not applicable to hand-knotted rugs, to barrier mats or to bathroom rugs.</p>
<p>Textile floor coverings – Small Ignition. Method for the determination of the effects of a small source of ignition on textile floor coverings (hot metal nut method)</p>	<p>BS 4790: 1987 or similar method in relation to ISO 6925. (900 degree nuts applied for 30+2 seconds)</p> <p>Note: Result face and back must not exceed 7.5cm (75mm) radius on either side. Loose laid method only, both flaming and smoulder/glow times required.</p>

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<p>Slip Resistant</p>	<p>This can evidence in a number of ways:</p> <ol style="list-style-type: none"> 1) By test house test method 2) Evidence via the base textile composition. This should include the 'anti-slip' technical data sheet
<p>Tests for colour fastness — Part B02: Colour fastness to artificial light: Xenon arc fading lamp test</p>	<p>ISO 105-B02:2014</p>
<p>DFS INNOVATION :</p>	
<p>DFS 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).</p> <p>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.</p> <p>Finished articles that may or may not pass the set test methods and requirements, products may be acceptable with a formal risk assessment and product awareness labelling structure approved by the DFS Quality Manager and Head of Quality.</p> <p>All risk assessments must meet the following criteria:</p>	
<p>Product Risk and Safety Assessment</p> <p>Where some recognised BS and EN test methods may not fully reflect how products are used by the end user, risk assessments allow DFS to assess worst case scenarios that may not be within test method scope.</p> <p>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.</p> <p>Please see a copy of the DFS Risk and Impact Assessment template in the appendix below.</p>	<p>What should a risk assessment include?</p> <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. Full 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 <p>Please see a copy of the DFS Risk and Impact Assessment template in the appendix below.</p>

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APPENDIX 6 – PRODUCT ASSESSMENT REPORT

RISK ASSESSMENT – (Probability verses severity of the issue during the foreseeable use or lifetime of the product)	Severity of Injury, Risk of Potential Harm:			
	Extreme (4)	Major (3)	Minor (2)	Slight (1)
7) Almost Certain (might well be expected - >50%)	28	21	14	7
6) Quite possible (>1 in 10)	24	18	12	6
5) Unusual but possible (>1 in 100)	20	15	10	5
4) Remotely possible (>1 in 1,000)	16	12	8	4
3) Conceivable, but highly unlikely (>1 in 10,000)	12	9	6	3
2) Practically impossible (>1 in 100,000)	8	6	4	2
1) Virtually impossible, unless aided or with intent (>1 in 1,000,000)	4	3	2	1
INJURY Categorisation	Injury Severity			
Pinching, scratching, minor swelling, small cuts and grazes not causing bleeding	Slight (1)			
Minor bruising, cuts causing bleeding, friction burns, breaking of skin, shear and squeeze	Minor (2)			
Skin irritation (chemical), deep lacerations, open wounds, entrapment of fingers or limbs, fractures, major bruising, any form of risk to children if unattended	Major (3)			
Breaking of bones, crushing of limbs, breathing difficulties, poisoning, electrical shock	Extreme (4)			
IMPACT ASSESSMENT – (Probability verses severity of the issue during the foreseeable use or lifetime of the product)	Severity of Issue Impact to DFS Interests:			
	Very High (4)	High (3)	Medium (2)	Low (1)
7) Almost Certain (might well be expected - >50%)	28	21	14	7
6) Extremely possible (>1 in 10)	24	18	12	6
5) Fairly possible (>1 in 100)	20	15	10	5
4) Remotely possible (>1 in 1,000)	16	12	8	4
3) Conceivable, but highly unlikely (>1 in 10,000)	12	9	6	3
2) Practically impossible (>1 in 100,000)	8	6	4	2
1) Virtually impossible, unless with intent (>1 in 1,000,000)	4	3	2	1
IMPACT Categorisation	Impact Severity			
Any issues that may cause consumer complaints on finished articles both motion, electrical and still models, perception or opinion impact.	Low (1)			
Any issues that may cause consumer complaints on finished articles both motion, electrical and still models, technical evidence impact.	Medium (2)			
Any issues that would cause concerns for overall longevity or any issues that would cause concerns for electrical safety. Regulatory or legislation view point.	High (3)			
Any risk that may potentially involve legal action against DFS. Personal injury, breach to regulations or not taking expected market leader responsibility.	Very High (4)			
Level of Approval / Acceptance	Severity			Key
ACCEPTABLE	Low OR Slight			1 to 3
ACCEPTABLE (Corrective actions, advisories and awareness)	Medium OR Minor			4 to 9
POSSIBLE ACCEPTANCE (Escalation and discussion required)	High OR Major			10 to 17
NOT ACCEPTABLE (Possible withdrawal from POS, corrective actions or recall required)	Very High OR Extreme			18 to 28

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Description of the risk or impact issue raised – GENERAL CHECKLIST (non-restrictive)	Type	Score	Acceptance Level
Safety & Risk – Potential and unforeseen harm by accident or deliberate including but not limited to entrapment, lacerations, and other injuries alike?			
Care labels and warnings – Warnings in line with potential risk? Any care advice to avoid call outs?			
Fire labels – Schedule 7 - Permanent label attached to every module/unit of upholstery and not easily removed?			
Fire labels - Schedule 6 - Display label attached and visible of the finished article?			
Fire labels - Mattresses & Divans – BS7177 label – Manufacturing date on the reverse?			
Interiors – Foam, or none foams - Is there enough in the product, does the interior provide bounce back, or under filled?			
Covers – Any flaws, damage, or cause for concern?			
Reference fabric - Sample attached for core upholstery, excluding Home upholstery.			
Upholstery sewing – Any comments on alignments, stitch quality, poor stitching, or poor workmanship?			
Fitting/conditioning – Do cover or cushions fit? Seat cushions, flat pack components, feet and legs, surfaces, and general condition.			
Joinery - Any issues with unit joining, wood or feet, do components join plush or as they are supposed to? (e.g., gaps, difficult connectors, drill holes marked).			
Stability – Is the product stable, for example, do tables and chairs move or appear uneven? Wall ties for any product that can topple.			
Motion furniture – any risk of entrapment anywhere in the manual or motorised movement? (not between 7mm-18mm) Clear working motion, without obstruction of risk of moving parts impacting the floor? Any issues tipping?			
Electrical components – switches/controls, power packs. Please note any concerns – UKCA & CE.			
Feet or Legs – Are they attached plush against the base, are they included, damaged or missing.			
Packaging – Advisories on weight, lifting, which way up, recliner unit safety, fragile for glass products?			
Awareness – Safety, glass, breakables, wall ties and advisories. Are there any foreseeable risks that are due to product design?			
Assembly instructions (AIs) – Are AIs true and satisfactory to the product and assembly?			
Any other comments – Add further details and reasoning			

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APPENDIX 7 – DFS CARE GUIDES (PRODUCT SAFETY, CARE ADVICE AND GENERAL AWARENESS)

All supplying partners must provide product care, safety and general awareness documentation that arrives with the product at point of delivery. Such documentation must be in line with the DFS level of expectation.

Please following the links below to view our levels of expectation:

Upholstery Care Guide

<https://www.dfs.co.uk/content/upholstery-care-guide>

Motion Furniture Guide

<https://www.dfs.co.uk/content/motion-furniture-guide>

Special Design Features

<https://www.dfs.co.uk/content/design-led-features-care-guide>

APPENDIX 8 – DFS Supply Partner Audit Responsibilities and Expectation

Tier 1 (T1) Supplier to DFS Trading Limited:	Location:	T1 Supplier Audited By:	DFS COP Type (T1):	Tier 2 (T2) Supplier Options to DFS Trading Limited:	DFS COP Type (T2):	T2 Supplier Audited By:	Tier 3 (T3) Supplier Options to DFS Trading Limited:	DFS COP Type (T3):	T3 Supplier Audited By:	DFS Requirements and Expectation Notes:
Manufacturer Supplying DFS Trading Limited	UK	DFS Quality Manager	Full DFS COP Audit	Purchased Finished Articles for DFS Purchase	Full DFS COP OR DFS Approved Equivalent	DFS T1 Supplier	Component Suppliers (Covers, Wood and Interiors)	Full DFS COP OR DFS Approved Equivalent	DFS T2 Supplier	DFS T1 suppliers have full approval to use DFS COP Pre-Audit Questionnaire and Audit plan, and factory floor checklists to meet DFS needs. Where existing audit systems are in place. These must be cross checked and approved by the DFS Quality Manager to ensure DFS needs are met.
	Overseas	DFS Quality Manager OR Accredited Appointed Other	Audit Assessment and Sign off of Suppliers of DFS Products.	Sub-Contracted Sections of Production Component Suppliers (Covers, Wood and Interiors)	Full DFS COP OR DFS Approved Equivalent Full DFS COP OR DFS Approved Equivalent		N/A N/A	N/A N/A		
PLEASE NOTE: All T1 suppliers or T2 suppliers who purchase finished articles for DFS purchase, must have the finished article producer sign the latest version of the DFS Code of Practice declaration.										
Importer and Wholesaler Supplying DFS Trading Limited	UK	DFS Quality Manager	Full DFS COP Audit of Importer	Purchased Finished Articles for DFS Purchase	Full DFS COP OR DFS Approved Equivalent	DFS T1 Supplier	Component Suppliers (Covers, Wood and Interiors)	Full DFS COP OR DFS Approved Equivalent	DFS T2 Supplier	DFS T1 suppliers have full approval to use DFS COP Pre-Audit Questionnaire and Audit plan, and factory floor checklists to meet DFS needs. Where existing audit systems are in place. These must be cross checked and approved by the DFS Quality Manager to ensure DFS needs are met.
	Overseas	DFS Quality Manager OR Accredited Appointed Other	Audit Assessment and Sign off of Suppliers of DFS Products.	Component Suppliers (Covers, Wood and Interiors)	Full DFS COP OR DFS Approved Equivalent		N/A	N/A		
PLEASE NOTE: All T1 suppliers or T2 suppliers who purchase finished articles for DFS purchase, must have the finished article producer sign the latest version of the DFS Code of Practice declaration.										
Agent or Facilitator Supplying DFS Trading Limited	UK	DFS Quality Manager	DFS COP - Process, Policy and Procedural Desktop Audit		Full DFS COP OR DFS Approved Equivalent	DFS T1 Supplier	Component Suppliers (Covers, Wood and Interiors)	Full DFS COP OR DFS Approved Equivalent	DFS T2 Supplier	DFS T1 suppliers have full approval to use DFS COP Pre-Audit Questionnaire and Audit plan, and factory floor checklists to meet DFS needs. Where existing audit systems are in place. These must be cross checked and approved by the DFS Quality Manager to ensure DFS needs are met.
	Overseas	DFS Quality Manager OR Accredited Appointed Other	Audit Assessment and Sign off of Suppliers of DFS Products.	Full DFS COP OR DFS Approved Equivalent	Full DFS COP OR DFS Approved Equivalent		N/A	N/A		
PLEASE NOTE: All T1 suppliers or T2 suppliers who purchase finished articles for DFS purchase, must have the finished article producer sign the latest version of the DFS Code of Practice declaration.										

APPENDIX 9 – Documentation and Certification

Key Corporate Policy:	Notes:
Health and Safety Policy	<ol style="list-style-type: none"> 1. English or Bilingual documents must be available for DFS use. 2. Non-conformities (NCs) will be issued if not satisfied. 3. Any NCs must be closed out in two (2) working weeks, or at the auditor’s discretion and reasoning.
Evacuation Policy	
Anti-Bribery Policy	
Whistleblowing Policy	
Equal Opportunities, Diversity, Gender Pay Gap, Discrimination Policies	
Environmental and Leather Policies	
Ethical Trading and Sourcing Policy	
Modern Slavery Statement / Policy	
Key External Operational Processes:	Notes:
On-boarding and Auditing process of key Component Suppliers (Wood, Mechanisms, Interiors and Covers)	<ol style="list-style-type: none"> 1. English or Bilingual documents must be available for DFS use. 2. Non-conformities (NCs) will be issued if not satisfied. 3. Any NCs must be closed out in two (2) working weeks, or at the auditor’s discretion and reasoning. 4. All finished article suppliers of Wholesalers, Importers and Agents who directly supply DFS must be signatories of the DFS COP as well as themselves. It is the responsibility of the DFS direct supplier or agent to coordinate all audits and collect the evidence required. 5. All sub-contractors and key component suppliers must be audited in line with the DFS COP. As a minimum requirement, corporate policy, process, and procedural evidence should be in line with DFS pre-audit questionnaire as this is viewed as a minimum requirement.
On-boarding and Auditing process of Sub-Contractors	
On-boarding and Auditing process of Finished Article suppliers	
On-boarding and Auditing process of Finished Piece/Unit suppliers	
Partner Review Process for the Quality and Performance of Products and Services	
Key Internal Operational Processes:	Notes:
Risk Assessment Process for Product Approval, Packaging and Sign off (PAS 7050)	<ol style="list-style-type: none"> 1. English or Bilingual documents must be available for DFS use. 2. Non-conformities (NCs) will be issued if not satisfied. 3. Any NCs must be closed out in two (2) working weeks, or at the auditor’s discretion and reasoning. 4. PAS7100 – Offers guidance on a Product Safety Incident Plan (PSIP). DFS can provide a copy. 5. PAS7050 – Offers guidance on a Product Safety Management Plan (PSMP). DFS can provide a copy. 6. Needles and Sharps should be controlled, allocated and stored under lock and key to avoid random selection. 7. All Risk Assessments should include a general process flow chart from the start to finish of the process. 8. All processes in this section should be documented and include images to demonstrate the process in full.
Risk Assessment Process for Chemical Storage	
Risk Assessment process for the allocation of Personal Protective Equipment (PPE)	
Process for Quality Service Level Agreement (QSLA) with sub-contractors / suppliers	
Process for the collection and management of Flame Retardant Chemical Information for product Textiles, Interiors and Electrical Components	
Product Transition from Design to Production Process	
Crisis Management and Business Continuity Plan	
Returns, Quarantine, Recall and Corrective Action Process (PAS 7100)	
Needles and Sharps Process (Best Practice)	
Feet and Leg Process (Best Practice)	
Packaging Process (Best Practice)	
Loading Process (Best Practice)	

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Critical Control Points (CCPs):	Notes:
Process for checking Goods Inbound (Quantities, Correctness and Damage)	1. Any documented process flow charts or standard operating procedures should be in English or Bilingual for DFS use.
Process for storage of Chemicals (According to risk type, e.g., Chemical and Water based solutions)	2. Not all processes may need documenting, this is at the auditor's discretion and reasoning based on the situation and complexity.
Process for the storage of Textiles and Leather	3. Non-conformities (NCs) will be issued if not satisfied, this is at the auditor's discretion and reasoning.
Process for the consistency of Interiors (foams, fibres, and feathers)	4. Any NCs must be closed out in two (2) working weeks, or at the auditor's discretion and reasoning.
Process for Timber, Textile and Leather Inspections	5. All Chemicals, Glues, Adhesives, Aerosols, and other substances alike should have available the COSHH technical data sheets (TDS) in English or Bilingual documents for DFS use. Chemicals must be in line with both UK and EU REACH regulations.
Process for Final Check of Finished Articles	
Process for Quality Monitoring and Inspection of Sub-Contractor Piecework, Components and Finished Articles	6. Moisture content inspections of Timber and Leather, ranging between 8% and 25%.
Product specifications of model types should be available to refer to on the factory floor	<p>1. These should be readily available at various locations in the factory and in local or first language of the factory teams.</p> <p>2. Non-conformities (NCs) will be issued if not satisfied, this is at the auditor's discretion and reasoning.</p> <p>3. Any NCs must be closed out in two (2) working weeks, or at the auditor's discretion and reasoning.</p>
Tolerance document and factory display of Defects of Fabric Flaws and Leather	1. English or Bilingual documents must be available for DFS use.
Tolerance document and factory display of Batching Colour Groups and Master Samples	2. Non-conformities (NCs) will be issued if not satisfied.
Tolerance document and factory display of Defects of Timber	3. Any NCs must be closed out in two (2) working weeks, or at the auditor's discretion and reasoning.
Tolerance document and factory display for Finished Articles	
Certification:	Notes:
SEDEX SMETA Audit	<p>1. 2 pillar audit is a mandatory requirement for all suppliers</p> <p>2. 4 pillar is an expectation to work towards within 3 years</p>
FSC/PEFC Certification	<p>3. Supply partners with Wood Mills or Conversion sites</p> <p>4. Supply partners suppliers must be FSC/PEFC certified</p>
ISO 9001 - Quality Management Systems	International certification is highly recommended and encouraged by DFS.
ISO 14001 - Environmental Management	
ISO 45001 - Health and Safety	

**DFS Group Support Centre
Quality and Compliance Department**