



'Supplier Code of Practice'

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V001	Paul Vaughan on behalf of DFS Trading	First launch of the DFS Supplier Code of Practice - Auditing Programme.	Technical, Quality and Compliance Department	Robin Scott	October 2019
V002	Paul Vaughan on behalf of DFS Trading	Start of the appendices for DFS standards, levels of expectation and awareness of key areas to the business	Technical, Quality and Compliance Department	Robin Scott	April 2021
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
V004	Paul Vaughan on behalf of DFS Trading	A number of minor updates to sections to refresh and develop areas offering clarifications and updates appropriately to development and growth. Appendices removed and links to PDFs provided to decrease the document size, updates to group policies from June's webpage. Please refer to COP V004 Update Control. New clause 6.18 includes Service Partners under the COP umbrella and 7.0 covering global product and importance of specified materials for DFS products and UK market.	Technical, Quality and Compliance Department	Robin Scott Liz McDonald	June 2024

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 occur, 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 Specification.
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 and best practice for upholstered and non-upholstered furniture, component and service suppliers of DFS. 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 across all forms of supply and service partners.

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 the structure and consistency of quality management, compliance to relevant UK, European regulations and DFS best practice expectation for all suppliers of finished articles, component suppliers and other service supplies.
- 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.
- h) To engage in other areas of supply that impact product performance, quality and transit to ensure that products arrive to the customer right first time (RFT).
- i) To assess and mitigate risks in areas where engagement can help understand and monitor variables that impact supplying DFS products.
- j) Supplier profiles are renewed annually with collected information. All information supplied to DFS representatives are for the direct use of the DFS Quality and Compliance department internally and to evidence responsibility to our authorities in the UK if requested.

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, component suppliers and service providers 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, performance and compliance of our suppliers of finished articles, components and service 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 decision maker 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, components and service 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.
- r) Technical service partners or providers (TSPs) and other product related service providers.

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 production or service 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 report will be issued. The report 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 / Service Providers:

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 if or where applicable.

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, Audit Plan, and the latest version of the DFS Code of Practice.
- e) When the audit documentation has been sent to the supplier, the DFS Compliance Auditor is notified at this point for perform a sub-audit review of the supplier's legal compliance.
- f) The Compliance Auditor will provide a basic review for the audit based on the supply partners performance and meeting DFS requirements.
- g) 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.
- h) The audit process will be in one location in one day and would typically be complete in ample time in the same day.
- i) 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.
- j) 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.
- k) Once the audit is complete, the auditor will complete the audit documentation which will be submitted to relevant DFS colleagues and the supplying partner.
- l) 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.
- m) Allowances may be made for delays beyond the control of the supplier e.g., testing.
- n) On completion of the process and once NCs are fully closed, the final audit report 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 should be closed out and supporting evidence provided in two working weeks of the report date. Exceptions will be approved on a case-by-case basis with a justifiable reason, this will be agreed by the auditing representative on the day. If third parties are used to audit, a DFS representative will review and approve all audits where applicable.

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 and have not been closed
6. Where there is clear product issue, trend or inconsistencies where key systems have failed
7. Where there are clear risks to legal compliance or other risks to DFS interests
8. On the sixth minor non-conformity, this will be classed as one major and will reset the minor tally

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
6. Where quality or technical opportunities have been advised with clear benefit, but not taken

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 to the deliverables and benefit.
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.
4. Any opportunities may or may not be escalated to a minor, this is down to the auditors discretion, on a case by case basis.

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:

Audit Quality Rating System:
A rating – 0 Major NCs and up to 3 Minor NCs. <i>Supplier fully satisfies the Code of Practice and continues with an annual audit.</i>
B rating – 1 Major NC and up to 3 Minor NCs.
C rating – 2 Major NC and up to 5 Minor NCs.
D rating – 3 Major NC and up to 5 Minor NCs. <i>NCs 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.</i>
F rating – 4 Major NCs.
U rating – 5 Major NCs. <i>Not acceptable and a re audit will be performed within 6 months for an F and 3 months for a U rating. Key improvements must be achieved. All U-rating audits will be a major cause for concern and DFS Leadership will be advised of the situation.</i>
<i>Note, on the sixth minor non-conformity, this will be classed as one major and will reset the minor tally.</i>

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 an ungraded audit 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, components and service providers contributing to DFS, the only difference will be testing 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 annually updated 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. All audits should not exceed 3 years.
All global manufacturing and UK importer partners with stock keeping or offices must have a SMETA audit for 10 or more total business colleagues, less than 10 colleagues may be considered for alternative routes to meet DFS requirements.
2. **FSC** - Timber chain of custody, to be renewed as per scheme requirements.
3. **PEFC** - Timber chain of custody, to be renewed as per scheme requirements.
4. **Leather Working Group (LWG)** – Leather Tannery Auditing, to be renewed as required.
5. **OEKO-TEX (OEKO-TEX STEP)** – Textile Mill Auditing, to be renewed as required.

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

6. **ISO9001** – Quality Management Systems, to be renewed as required.
7. **ISO14001** – Environmental Management, to be renewed as required.
8. **ISO45001** – Health and Safety Management, to be renewed as required.
9. **Planet Mark** Sustainability Certification, to be renewed as required.
10. **FIRA FISP** – Furniture Industry Sustainability Programme, to be renewed as required.

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 are keen interests 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.
12. Risk and needs assessments of employee operations.

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 if manual or regularly if self-calibrating. Evidence of this will be required for the auditor to view and receive a copy of or photo evidence.

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 free of charge to all employees to meet their needs.

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.

DFS Trading Limited (DFS)

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 products 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 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 or including 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 number 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.

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.

There are 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.

The new ***EU Battery Regulation, Regulation 2023/1542***, introduces significant changes and requirements aimed at enhancing the sustainability and safety of batteries and battery-operated products.

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 several 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:

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

Testing:

Please refer to the DFS Testing Specification. 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 Specification 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 agree 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.

This clause as noted in section 5, will be subcontracted to the DFS compliance representative to complete a review for the purposes of this audit.

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 Sofa Delivery Company (Sodelco) or other specified location.

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.

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 as fully recovered.
3. How knives, sharps and staples are controlled specifically or 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 investigate 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.
8. Product risk assessments expectations performed in best practice, for example, the link to download the PAS 7050 standard: <https://www.bsigroup.com/en-GB/standards/pas-7050/>

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

Due to the scope of this section regarding supplier and product type, it is not possible to specify exact requirements in this COP. The auditor will assess specifics on the audit day in line the DFS COP.

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 quality and control points for risk and quality under each station of the production process where applicable
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.

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The key critical control points (CCPs) should be risk-based assessments of risks and impacts, including but not limited to:

1. Component supplier relationship and Service level agreements (including quality and agreed performance).
2. Product transition plan from design and development into mass production.
3. Approved suppliers and supplier auditing against DFS Code of Practice.
4. On-boarding process, approval and change management, and criteria for suppliers.
5. Due diligence testing of components and materials to set criteria and categorised performance measurements.
6. Inbound material control and verification.
7. Key production control for structural control of DFS products, e.g., frames and mechanisms.
8. Identification, labelling and storage of UK materials and certified products, in both bulk storage and in small, converted pieces that presents a threat to DFS interests.
9. Management of people in production, risks to human error that could impact DFS interests.
10. Management of Needles and Sharps in the business, allocation, storage and use in line with DFS expectations.
11. Control of UK material traceability in production, connecting materials to final batch or identify number.
12. Control of UK materials in smaller batches to reduce the treats to product recalls.
13. Business and product continuity in the event of any crisis.
14. Training and awareness of the Workforce to the CCPs.

The key critical quality points (CQPs) should be risk-based assessments of risks and impacts, including but not limited to:

1. Inbound material inspections including leather, textiles, interiors, timber and electronics. Removing defaults and quarantining defects or materials not fit for production or product expectation.
2. Colour matching and grading confirming of leather and textiles against the master samples.
3. Weight, dimension and fitting checks of subcontracted materials and interiors from subcontractors and just in time suppliers.
4. Storage of leather and timber, rotation and moisture controls in conditioned storage.
5. Controls at cut and sew stations, including service parts, reworks and rejections.
6. Controls of sectional manufacturing, final checks at each section prior to final assembly.
7. Controls of subcontracted piece work in advance to production to avoid end of line bottlenecking.
8. Allocation control of correct fixings, instructions and feet.
9. Consequences of poor performance in production line, piece work action against pieces produced.
10. End of line final inspection of units and complete finished articles, where finished articles cannot be inspected as a final product, other measure must be in place to reduce the risks of inconsistencies.
11. Packaging controls to ensure products journey to the end destination is assured. Including best practice packaging and loading for the journey.
12. Full control around the installation of electrically operated furniture. This needs to be an approved assessment from Research and Development into production and signed off with a quality checkpoint assigned.

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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 8 and 9** for a list of expectations regarding key documentation, certification, and auditing responsibilities of DFS supply partners.

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6.18 TECHNICAL SERVICE PARTNERS OR PROVIDERS (TSPs) AND OTHER PRODUCT RELATED SERVICE PROVIDERS

As a responsible retailer to the market share DFS supplier, we take it upon ourselves to audit and assess our non-product producing or supplying partners to ensure product safety, quality and compliance risks are kept low and can be raised at the earliest opportunity.

The auditor will use the audit plan document highlight all the areas of the DFS Code of Practice that are applicable to the auditee service provider in question.

In the code of practice, there will be areas that are relatable regarding process, policy and procedures, in addition, service providers will be assessed in relation to the service provided to DFS.

DFS partners in this section can include, but not limited to:

- Testing houses
- Third party service providers for subcontracted particulars of our supply process (E.g., document collecting, off site storage and cross check of documentation)
- Internal or External delivery partners
- Stock keeping units

Audits are at the discretion of the DFS Quality and Compliance department in line with the business needs and interests.

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7.0 DFS PRODUCTION FOR THE UK DOMESTIC UPHOLSTERED FURNITURE MARKET

As a market leading UK retailer, there is an unspecified level of expectation put on DFS as an importer and market leader, we are expected to take every reasonable and measurable step to evidence our responsibility to the high percentage of the UK market DFS suppliers.

If DFS products are found to be non-compliant by an authority in the UK, DFS would be fully investigated by the authorities to assess our level of responsibilities in line with UK authorities' expectation.

DFS would be required to evidence our Product Safety Management Systems as a manufacturer and importer to the mass market. This would include our direct involvement in product safety assessments and risk assessments for the UK domestic environments and other particulars that would impact the business.

To reduce potential risk in any situation, DFS proactively engages and encourages all suppliers via the code of practice to engage and aim to prevent potential risks in the supply chain that could impact our business interests and identity.

If DFS supply partners do not meet our specifications and levels of expectation, advisories and engaged controls via the DFS code of practice, suppliers are putting DFS at risk in the UK market with severe financial consequences in the event of a product recall.

Storage of UK market upholstery and DFS specified materials

The risks to DFS are the areas we cannot directly control in global supply and manufacture of the products we sell in DFS stores and website.

For UK manufacturing partners, there could be risks around whether the supplying partner exports to the global market or suppliers the UK non-domestic sector. Both areas in UK manufacturing provide the risks to DFS domestic market products, therefore, this understanding and engagement is required to understand the risks to DFS.

For non-UK manufacturing partners, there are risks associated with similar models for other global markets that do not specify combustion modified (FR) upholstery materials. The risks are very high to non-compliance without the levels of engagement required from DFS supplying partners.

The UK regulations are enforced by the UK Government, Office of Product Safety and Standards (OPSS), and the test methods used are designed by the UKs national standards agency BSI (British Standards Institute). Testing houses worldwide test to the UK standards as a point of difference to the rest of the world.

Key areas of critical control for UK upholstery and specified materials

We appreciate DFS or UK business may be small to other global business, and we want to work with all suppliers to agree and approve the level of expectations around the importance of UK upholstery materials. Depending on DFS production size, we would expect the following levels of control:

- Bulk material storage separation, moveable 'pop up' barriers and labelling to help with space in storage and small loads of UK materials for upholstery and certified FSC or PEFC timber.

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- Converted UK FR materials or certified FSC or PEFC timber must be completely and clearly separate and labelled accordingly to identify these in production and allocation to production. Small production suppliers can have a static location, however, moveable ‘pop up’ systems of control can benefit small production. Large production suppliers with more threat to UK compliance must exercise more direct control to better eliminate the risks to DFS interests as an importer. This process should be documented and approved by DFS representatives.
- Machinery used to blow interiors should be separate and cleared before using UK materials. To avoid the possible human error and contamination of non-FR materials being used in conjunction with UK FR materials for DFS products.

UK manufacturing partners

As manufacturers, these supplying channels have direct responsibility to be compliant to all UK and European regulations to the states where DFS products are delivered. Key accountabilities to this channel must include the following expectations:

1. If UK manufacturing or any manufacturing partners export furniture globally or UK non-domestic sector, there must be a clear separation of materials used in production. With other markets and sectors specifying their own requirements, this requirement must be a critical control point (CCP) as a main threat to domestic compliance in the UK.
2. All component suppliers and subcontractors should be audited annually to a specified measurement of expectations. A basic measure are the requirements of the DFS COP Pre-Audit Questionnaire. Key partners to audit are subcontractors, finished article suppliers (UK and Overseas), leather and textile suppliers, electrical and mechanical component suppliers, timber and interior suppliers. These are considered as the key component suppliers that have a direct impact and risk potential to product and DFS interests.
3. There should be a supplier Service Level Agreement (SLA) in place with suppliers noted above in point 2. The SLA should include quality of work, quality of materials, physical performance expectation and chemical information test report sharing in line with REACH regulations.
4. Leather and Textile suppliers provide materials at a specified or agreed level of expectation, however, there needs to be agreed performance levels of materials and this must be agreed. E.g., How can the textile supplier assure the 100,000-meter used is the same physical performance testing as the tested batch? This should form part of the agreement of materials to assure DFS of the quality of materials supplied.
5. Sharing of information. UK and EU REACH regulations requires the downstream users to share compliance information for banned and substances of very high concern (SVHC). Supplying partners are expected to actively engage and collect chemical compliance information to evidence responsibility to materials used in production including covers, interiors, timber and other primary components of furniture.
6. Manufacturing partners who also supply DFS finished articles from other manufacturers also has responsibilities to those products, it is expected that all those suppliers providing finished articles are also signatories of the DFS Code of Practice, and it the responsibility of the direct DFS supplier to complete this process. It is the DFS supply partners responsibility

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to audit those suppliers in line with DFS Code of Practice.

7. All manufactures supplying DFS, and other customers must be able to clearly separate and show clear evidence of FSC, PEFC and non-certified timber in its large and converted state. Where DFS are paying for certified timber, this is exactly what we expect to receive, therefore, if manufacturers offer points of difference, this must be clearly demonstrated, with direct assurance to human error or confusion being difficult to happen.
8. DFS expects manufacturing partners fully understand, educate and make their business aware of expectations, evidence is required of this to assure us that risks are kept low. This is including the batches of upholstery materials; these should be kept to smaller batches where possible in the event of regulatory testing failure. The smaller the batches would mean any national recall in the UK if found non-compliant would be kept to a minimum impact. Where batch are large, it is expected that suppliers increase testing to ensure materials remain compliant.

European (EU) manufacturing partners, supplying directly to DFS

DFS is classed as a manufacturer of your products for the UK market, as the legal importer to the UK, it is our direct requirement and expectation that our manufacturing partners meet applicable points above. DFS must emphasise the threat to our business around the separation of certain materials if they are FR treated or certified components, including:

- Storage of inbound or bulk materials. These must be separated and labelled clearly in accordance with the materials type and labels. This must also be in English for auditing purposes. Although bulk materials are a lower risk, DFS would expect clear separation by location, material colours and clear separation and labelling. This should also be a formal documented process and embedded in the material allocation and production processes.
- Storage, movement, labelling and allocation of converted upholstery materials like foam, fibre, timber and textiles. Converted materials like timber and foam pieces are key threats to DFS interests, we must see clear separation and storage of key materials used and purchased by DFS.
- If direct manufacturing partners are supplying DFS finished articles produced by another manufacturer, then they also must be a signatory of the DFS code of practice. A full DFS code of practice audit must be completed by the direct manufacturer or approved DFS code of practice technical service provider. Expectation of these suppliers are identical as the direct supplier to DFS.
- Partners in Europe are directly responsible for European Directives and compliance to all relevant product safety, chemical, batteries and electrical compliance.

Manufacturing partners outside the UK do not have direct responsibility for products exported, the responsibility for all UK compliance is that of DFS, therefore, all partners must comply to DFS specifications and requirements.

In addition, overseas partners will be held to account if found not to be meeting DFS expectation following full engagement from the Quality and Compliance department. These particulars will be audited against in the DFS code of practice.

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Far / Southeast Asia and other manufacturing partners, supplying directly to DFS

DFS is classed as a manufacturer of your products for the UK market, as the legal importer to the UK, it is our direct requirement and expectation that our manufacturing partners meet all requirements of the above. DFS must emphasise the threat to our business around the separation of certain materials if they are FR treated or certified components, including:

- Storage of inbound or bulk materials. These must be separated and labelled clearly in accordance with the materials type and labels. This must also be in English for auditing purposes. Although bulk materials are a lower risk, DFS would expect clear separation by location or material colours. This should also be a formally documented process and embedded in the material allocation and production processes.
- Storage, movement, labelling and allocation of converted upholstery materials like foam, fibre, timber and textiles. Converted materials like timber and foam pieces are key threats to DFS interests, we must see clear separation and storage of key materials used and purchased by DFS.
- If direct manufacturing partners are supplying DFS finished articles produced by another manufacturer, then they also must be a signatory of the DFS code of practice. A full DFS code of practice audit must be completed by the direct manufacturer or approved DFS code of practice technical service provider. Expectation of these suppliers are identical as the direct supplier to DFS.

For suppliers outside of Europe, DFS has a greater expectation of compliance around the importance of article and component compliance to other UK and EU regulations such as:

1. REACH, Biocidal Products and Persistent Organic Pollutants (POPs) Legislation.
2. General Product Safety Regulations (Product Safety Management and Incident Plans)
3. Machinery (Electronically Operated products only)
4. Electromagnetic Compatibility (EMC)
5. Low Voltage Directive (LVD)
6. Restriction of Hazardous Substances (RoHS)
7. Battery Regulations

Manufacturing partners outside the EU do not have direct responsibility for products exported, the responsibility for all UK and EU compliance is that of DFS, therefore, all partners must comply with DFS requirements for the UK and EU markets.

In addition, overseas partners will be held to account if found not to be meeting DFS expectation following full engagement from the Quality and Compliance department. These particulars will be audited against in the DFS code of practice.

UK Importing or wholesale partners, supplying directly to DFS

UK compliance is the responsibility of all UK importing partners. DFS importing partners are classed as manufacturers for all DFS products imported into the UK, non-compliance to UK regulations and expected due diligence. DFS would hold importing partners accountable appropriately to their responsibilities in line with DFS expectations and legal compliance.

DFS expectations of all importing partners are as follows:

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1. All finished article suppliers of DFS product must be signatories of the DFS Code of Practice.
2. All suppliers must be audited against DFS COP either by the importer or approved DFS service provider.
3. DFS pre-audit questionnaire and audit checklists can be used by all importing and wholesale partners.
4. Audits must be annually, DFS representatives will audit importer supply partner audits.
5. Importers are expected to show product testing due diligence for products imported.
6. All importer partners product suppliers must meet all requirements of points above for UK manufacturing.

Wholesale partners must exercise points **1, 2, 3 and 4** in this clause as a direct supplier to DFS.

UK Agents or sales representation, working on behalf of overseas manufacturing partners

Contacts and representation under this section hold no direct accountability to products and legal compliance, however, expectations and relationships in these sections hold major impacts to DFS products, legal compliance and other DFS interests.

Expectation of representative in this section are as follows:

1. Full understanding to this section of supply partner expectations.
2. To ensure all the DFS supplying partners meet points **1 to 4** above and to assist with DFS expectation and direct requirements.
3. Responsibility of fully understanding UK market expectations legally around general product and fire safety.
4. To ensure that DFS Code of Practice is adhered to, and embedded.
5. To assist engagement into the decision makers and required people.
6. To ensure all product related engagement and requirements are met in line with DFS product assessments.

Where there are issues with products or expectations not being met, partners in this section must put DFS representatives in direct contact with relevant decision maker to register the importance of issues raised.

DFS relies on these relationships of our partners in this section to deliver DFS expectations.

All supplying partners globally are expected to understand the reasoning and impacts of risks where controls of upholstered, specified and certified materials can be compromised, DFS requires mutual understanding and agreed actions to close identified gaps that presents a major risk.

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8.0 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.

As a DFS technical service provider or other service partner, all are required to take part in the supplier auditing programme.

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.

9.0 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.

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10.0 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:

Robin Scott

Email: Robin.scott@dfs.co.uk

Commercial Director:

Arron Burton

Email: Arron.burton@dfs.co.uk

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11.0 DECLARATION:

As a valued supplying or service partner to DFS, we adhere and support the Code of Practice, and understand that failure to meet the relevant requirements applicable to our business, product or service 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.

Finally, we understand that as a signatory of the DFS Code of Practice, this in accordance with the latest versions published on this DFS continuous improvement programme. Only one signature is required at the on-boarding stage, unless requested specifically by DFS.

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:

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APPENDICES:

APPENDIX 1 – [DFS GROUP POLICIES](#)

APPENDIX 2 – [PRODUCT AND PACKAGING LABEL SPECIFICATION](#)

APPENDIX 3 – [CHEMICAL AND SUBSTANCES AWARENESS](#)

APPENDIX 4 – [DFS TEXTILE PERFORMANCE GUIDANCE](#)

APPENDIX 5 – [REGULATORY, STRUCTURAL, SAFETY, AND PERFORMANCE TESTING GUIDANCE](#)

APPENDIX 6 – [PRODUCT ASSESSMENT REPORT](#)

APPENDIX 7 – [DFS CARE GUIDES \(PRODUCT SAFETY, CARE ADVICE AND GENERAL AWARENESS\)](#)

APPENDIX 8 – [DFS SUPPLY PARTNER AUDIT RESPONSIBILITIES AND EXPECTATION](#)

APPENDIX 9 – [AUDIT DOCUMENTATION AND CERTIFICATION](#)

APPENDIX 10 – [DFS TESTING SPECIFICATION](#)

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