

**Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

The Modern Slavery Act 2015 includes slavery, servitude, forced or compulsory labor and human trafficking.

**Organization Structure**

Forms+Surfaces designs and manufactures architectural products used in public spaces around the world. From walls and elevator interiors to site furnishings and lighting you will find our products in office buildings, airports, restaurants and hotels, and in universities, healthcare facilities, parks, and city centers. Key relationships on local and regional levels contribute to our global agility. We have large manufacturing and customer service facilities in the United States and India and an International sales team with offices in London, Dubai, Singapore, Bangkok and Hong Kong.

**Supply Chain**

Many organizations manufacture materials on our behalf. We are continuously searching the world for suppliers and partners with unique materials or technologies that can help advance our supply base and expand the pallet for our design group. To control the impacts of these organizations to the best of our ability, we manage procurement of raw material through our vendor selection and certification processes. When possible we send a company or third party contracted representative to perform an audit of that vendor's capabilities and company policies. In instances where an in-person audit is not feasible, documentation is requested to support stated capabilities and policies.

**Policies on Modern Slavery**

Although we do not have separate policies that specifically call out slavery, servitude, forced or compulsory labor and human trafficking, we comply with all applicable laws and therefore a violation in any of these categories would be against our Code of Ethics.

It is the policy of Forms+Surfaces to comply with all laws and regulations that are applicable to our business or operations in the United States and in each country where we do business directly or indirectly. It is also the policy of Forms+Surfaces to conduct our business and operations in keeping with the highest ethical standards.

**Reporting**

Forms + Surfaces has a zero-tolerance approach to modern slavery in our organization and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of these ideals.

If employees have a concern or suspicion of any illegal or unethical conduct they are encouraged to promptly report the act to a Human Resources Manager or a member of our Senior Management Team.

With regard to our supply chain, regular site audits are performed for key suppliers, meeting with ownership to listen and possibly act upon concerns. Special attention is given to ensuring safe working conditions. If F+S identifies a vendor that is violating our policies or expectations, the vendor is replaced as soon as possible and authorities are notified if applicable.

Forms+Surfaces forbids retaliation against individuals who in good faith report actual or suspected violations.

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**Training**

We support our commitment and controls by providing training to our employees. The training is designed to create awareness around the problem of modern slavery and to help employees identify the signs of modern slavery in our supply chain.

For training purposes Forms+Surfaces utilizes the “Home Office” guidebook available through the [www.gov.uk](http://www.gov.uk) website. Published through Assets publishing this guidebook is entitled “Modern Slavery Awareness Booklet” and it is a clear and up to date guide that helps employers/employees who may not routinely come across modern slavery, recognize the signs and respond to these signs in a caring and lawful manner. Please see the link below for more details.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/655504/6.3920\\_HO\\_Modern\\_Slavery\\_Awareness\\_Booklet\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_HO_Modern_Slavery_Awareness_Booklet_web.pdf)

**Effectiveness in Combating Slavery and Human Trafficking**

An annual review will serve as the basis for determining how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business. The annual review will include:

- Use of companywide payroll systems, ensuring conformance to the prevailing market wage as well as meeting or exceeding minimum wage standards as required by law
- Analysis of vendor audits
- Assessment of the level of communication and contact with both our employees and our clients and their understanding of, and compliance with, our expectations



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