

# CORT BUSINESS SERVICES UK LTD MODERN SLAVERY ACT TRANSPARENCY STATEMENT For Fiscal Year 2023

CORT Business Services UK Ltd (hereinafter "Roomservice by CORT", "we", "our") takes its obligations under the UK Modern Slavery Act 2015 very seriously and continues to develop a robust working practice to comply with its obligations. This statement sets out those practices and gives insight into the supply chain and business processes of Roomservice by CORT. This Modern Slavery Act Transparency Statement is issued in compliance with section 541(1) of the Modern Slavery Act 2015 for the financial year ending December 2023.

# ORGANISATIONAL STRUCTURE OF ROOMSERVICE BY CORT

CORT Business Services UK Ltd (trading as Roomservice by CORT) is a private limited company incorporated in England and Wales. The company is a wholly owned subsidiary of CORT Business Services, a member of the Berkshire Hathaway Group. CORT Business Services UK Ltd's business for the UK operates from its offices in Chessington, Surrey.

# OUR BUSINESS AND SUPPLY CHAIN RISK ASSESSMENT

Roomservice by CORT is the UK's leading furniture rental provider. Roomservice by CORT's network of vendors and supply chains are worldwide and complex. Since Roomservice by CORT does not manufacture our own goods, we consider the greatest potential sources of risk of modern slavery and human trafficking to exist in our supply chain and with service contractors that might trigger specific risk categories, including the presence of foreign migrant workers. Roomservice by CORT is committed to continuing to develop policies, procedures, and training that will help identify, mitigate and manage the risk with the ultimate goal of eradicating slavery and human trafficking in our supply chain.

# VALUES AND POLICIES

Roomservice by CORT's Vendor Code of Conduct is the cornerstone of our approach to a responsible supply chain, outlining our legal, humane, and ethical standards of production. Any form of forced labor, including but not limited to indentured and bonded labor, involuntary overtime, and prison is a zero tolerance violation to our Code of Conduct. The Code of Conduct details our expectations that our partners and vendors will comply with the UK Modern Slavery Act reporting requirements. Roomservice by CORT also expects our partners and vendors to respect and uphold the principles of our Vendor Code of Conduct within their own supply chains. All new vendors are required to review and sign our Vendor Code of Conduct during our onboarding process. All existing vendors were required to review our Vendor Code of Conduct at the time it was adopted. In the event of suspected or known non-

compliance, the Code provides Roomservice by CORT with the ability to take remedial actions, up to and including termination of the relationship with that partner or vendor.

#### DUE DILIGENCE AND CERTIFICATION

Supplier compliance with Roomservice by CORT's Vendor Code of Conduct is monitored in different ways, predominantly through a "Supplier Appraisal Questionnaire," which is issued to new suppliers upon on-boarding based on supplier location and known risk factors using a Red Amber Green (RAG) rating system. In 2024, Roomservice by CORT will engage a third party commercial and supply chain risk intelligence provider to increase visibility into our network of suppliers. Subsequent assessments will be completed for new and existing suppliers based on risk factors identified using this third party due diligence program. The frequency of these assessments will depend on if the supplier operates in a high-risk context and when the additional risk factors are identified, such as sanctions, export controls, regulatory action, political exposure, adverse media, and geographic history of infractions.

As part of the formalization in our on-boarding process with suppliers, we require our approved vendors to certify in writing that materials incorporated into the products in which we rent or sell comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Our Vendor Code of Conduct requires all vendors, pursuant to purchase order terms, to agree that all merchandise shipped to Roomservice by CORT and any of its subsidiaries is manufactured and produced in full compliance with any applicable current, or later adopted, laws of the country of manufacturer governing the use of child labor, illegal forced labor, illegal prison labor or similar illegal working conditions, as well as any other applicable human rights statues, regulations and laws. In cases where there is a difference between the requirements of local law, international law, and our Vendor Code of Conduct, the more stringent standards apply.

In addition to implementation of Supplier Appraisal Questionnaires and vendor certifications, Roomservice by CORT has adopted a range of policies and procedures for risk mitigation (including the risk of human trafficking and slavery) including:

- Implementation of Berkshire Hathaway Prohibited Business Practices Policy
- Whistleblowing through the Berkshire Hathaway Hotline
- Gift Inducements & Hospitality Policy
- Financial Sanctions Policy
- Conflicts of Interests Policy
- Anti-Bribery Policy
- Anti-Money Laundering Policy

Roomservice by CORT's vendors and suppliers are expected to implement a zero-tolerance approach to forced labor and human trafficking and to comply with all local and national laws and regulations including but not limited to the UK Modern Slavery Act 2015

While we always seek to work with our suppliers to address and remediate any concerns about their ethical practices, ultimately, if we are unable to satisfy ourselves that any supplier will be able to comply with the ethical standards set out in Roomservice by CORT's Vendor Code of Conduct, we have the option to terminate the business relationship.

#### **AUDITS**

CORT is not engaged in conducting remote audits to ensure suppliers comply with our Vendor Code of Conduct requirements for trafficking and slavery in supply chains. Should a concern arise, CORT will use other methods at our disposal, not limited to unannounced and independent visits, to validate compliance with the Vendor Code of Conduct.

# **TRAINING**

We are committed to creating a working environment that is inclusive and supportive, based on mutual respect and trust, and where everyone is of value. Roomservice by CORT Services has a number of internal policies and procedures in place, including an Ethics Hotline, all of which showcase our commitment to uphold exemplary ethical standards and demonstrate our ambition for our employees to enjoy equal opportunity in an environment that is free from discrimination, harassment, and victimization.

We ensure that we have the requisite competencies within our organization, attained through training related to human rights and experience. We work to protect the integrity of our supply chain by regularly engaging and educating our internal teams on supply chain issues, including those related to modern slavery, human trafficking and forced labor.

- During our annual compliance training, we will provide educational materials and online training on Modern Slavery to all Roomservice by CORT employees. This training will include identification of signs of slavery and exposure to available resources including the Modern Slavery Helpline: 0800 0121 700 and Report Website: https://www.modernslaveryhelpline.org/report
- We will provide additional, more specialized training to help our senior management and those
  employees who work directly with the supply chain to recognize and mitigate Modern Slavery
  risks.
- In our efforts to continuously improve our Modern Slavery training program, we have requested that our Learning Management System make available additional training materials that address the risks specific to our industry.
- We continue to provide new vendors with an education about Roomservice by CORT's business standards by requiring that all new suppliers of finished goods and raw materials review the Vendor Code of Conduct.

#### **APPROVAL**

This Modern Slavery Statement was approved by the Directors of Roomservice by CORT on 15 January 2024 and signed on their behalf.

# Ken Ebenezer

Ken Ebenezer