

## Dunelm Colleague Code of Conduct

September 2021

Dunelm's corporate purpose is 'To **help create the joy of truly feeling at home. Now and for the generations to come.**' One of our **ambitions** is for Dunelm to be a **great place to work**, and for all of our colleagues to feel 'at home' with us.

We have a strong set of **shared values**, and our Board and senior management are accountable for role modelling these.

We ask all of our suppliers, including those who supply us with workers who carry out their duties on our premises, to sign up to our **Ethical Code of Conduct**, which is based on internationally recognised labour codes, and available on our corporate website [corporate.dunelm.com](http://corporate.dunelm.com).

We apply similar principles to our own colleagues, as set out below in this **Colleague Code of Conduct** ('Code'), and we require our Board and all of our colleagues to comply with this.

### **Scope**

#### ***How we embed the principles of this Colleague Code of Conduct***

The principles set out in this Colleague Code of Conduct are embedded in all of our colleague terms and conditions, policies and practices. All colleagues receive a written contract of employment, and all of our policies are available on our 'Home Comforts' intranet site, to which all colleagues have access.

Examples of some of our policies are set out below (those in bold are publicly available on our corporate website, [www.corporate.dunelm.com](http://www.corporate.dunelm.com)):

- Colleague Privacy Notice
- **Equality and Diversity Policy** (this covers all types of discrimination, as well as bullying and harassment)
- Grievance Policy
- **Health and safety Policy**
- **Slavery and Human Trafficking Statement and Prevention of Modern Slavery Policy**
- Holiday Policy
- Maternity, Adoption and Parental Leave policies
- Retirement Policy

Our policies complement minimum legal requirements to which we are subject, these cover topics such as the right to a written contract of employment, minimum rates of pay, child labour, equal pay, working hours, health and safety, minimum paid holiday and parental leave, anti-discrimination and harassment, fair disciplinary procedures, unfair dismissal and redundancy.

#### ***Fair reward, training and wellbeing***

We have a consistent remuneration structure that applies throughout the organisation, and are committed to providing:

- **Fair reward** – pay and benefits, equal pay, paid holiday leave, paid leave for volunteering, a birthday day off, access to our Sharesave share option scheme for all, etc.
- **Training and development** – including apprenticeships, a graduate scheme and employment for local communities and underprivileged groups
- **Support for health and wellbeing** – including training, wellbeing buddies, access to internal and external specialist support, access to a Colleague hardship fund.

Further details of our People Strategy and policies are set out in our latest annual report, available at [www.corporate.dunelm.com](http://www.corporate.dunelm.com).

#### ***Training***

Our colleagues are required to complete training on relevant policies such as health and safety, equality and diversity, data protection and modern slavery, and support and training on other legal requirements and policies is available from our People Team.

#### ***Circulation***

This policy will be made available to colleagues via the Home Comforts intranet and publicly to all on our corporate website [www.corporate.dunelm.com](http://www.corporate.dunelm.com).

## **What our Code covers**

### ***Child Labour***

- We do not use child labour.
- No children under the age of 15 are employed by us.
- No children or young persons under the age of 18 are employed to work during night shifts.
- No children or young persons under the age of 18 work are employed to work in hazardous conditions that include machinery, chemicals, cutting machinery, forklifts or heavy lifting.

### ***Employment is Freely Chosen***

- We do not use any forced or bonded labour, or involuntary prison labour.
- Colleagues are not required to lodge 'deposits' or their identity papers with Dunelm and are free to leave Dunelm after reasonable notice.
- Dunelm carries out risk assessments to understand areas of vulnerability, and takes steps to raise awareness internally and with our partners to establish clear policies and due diligence on human trafficking (please see our annual **Slavery and Human Trafficking Statement** on [www.corporate.dunelm.com](http://www.corporate.dunelm.com)).
- Dunelm strictly prohibits any exploitive labour practices or any associated criminal conduct.

### ***Excessive Hours of Work***

- Maximum working hours comply with national laws.
- Working hours, excluding overtime, are set out in a colleague's employment contract, and do not exceed 48 hours per week on a regular basis.
- All overtime is voluntary. Overtime is to be used responsibly and should not exceed 12 hours per week on a regular basis. Overtime is not used to replace regular contracted hours.
- Colleagues are provided with at least one day off in every seven-day period and paid holidays are provided in accordance with the law, as a minimum.

### ***Wages and Benefits***

- Wages and benefits paid meet, as a minimum, national legal minimum.
- All colleagues are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Details of policies are available on our colleague 'Home Comforts' intranet or from a member of the People Team.
- Deductions from wages as a disciplinary measure are not permitted, nor are deductions from wages not provided for by national law permitted without the expressed permission of the colleague concerned.

### ***Freedom of Association***

- We have an active colleague council (the 'Colleague Voice') through which colleagues are able to raise views and concerns – from local to regional level – with management and the Dunelm Group Board. Colleague Voice representatives are not discriminated against and have access to carry out their representative functions in the workplace. Further details can be found in Dunelm's latest annual report, available at [www.corporate.dunelm.com](http://www.corporate.dunelm.com).
- Freedom of association and the right to collective bargaining are respected, and all colleagues, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- Dunelm adopts an open attitude towards the activities of trade unions and their organisational activities.
- Where the right to freedom of association and collective bargaining is restricted under law, Dunelm facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### ***Discrimination***

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Dunelm expects all colleagues to comply with our Equality and Diversity Policy, available on our corporate website [www.corporate.dunelm.com](http://www.corporate.dunelm.com), on our colleague 'Home Comforts' intranet or from a member of the People Team, and mandatory training is provided.

#### ***No harsh or inhumane treatment is allowed***

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.
- Every colleague shall be treated with respect and dignity.
- Dunelm has a written **Grievance Policy** and all disciplinary measures are recorded.

#### ***Regular Employment is provided***

- To every extent possible, work performed must be based on the recognised employment relationship between Dunelm and its colleagues, established through the employment contract and national law and practice.
- Obligations to colleagues under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

#### ***Health and Safety***

- Dunelm is committed to ensuring the health, safety and wellbeing of its colleagues.
- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Colleagues shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned colleagues.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of colleagues.
- Dunelm shall assign adequately trained first aid personnel at each Dunelm premises.
- Dunelm's Health and Safety Policy is available on our corporate website [www.corporate.dunelm.com](http://www.corporate.dunelm.com), on our colleague 'Home Comforts' intranet or from a member of the People Team.

#### ***Agency Labour***

- Our preference is that all workers in our business are directly employed by Dunelm.
- If workers are sourced from a third party, for example to accommodate fluctuating demand or to fill a short-term requirement, Dunelm will ensure that the third party is reputable and (if required) properly licensed.
- Agency labour providers must ensure that all workers supplied have the right to work in the United Kingdom and are engaged on terms that comply at least with minimum legal requirements.
- Agencies must be made aware of and sign Dunelm's **Ethical Code of Conduct** to confirm that they comply with it.

#### ***Speak Up!***

The principles set out in this Code are reflected in Dunelm's colleague policies and we expect them to be complied with. If a colleague or worker believes that the Code is not being followed, or if a colleague or worker has concerns about an incident or behaviour, Dunelm encourages them to raise this so it can be addressed. Every colleague should feel able to speak to their line manager with any concerns in the first instance. Dunelm operates a policy of non-retaliation. Colleagues will not be penalised, prejudiced or otherwise incur reprisals for raising concerns in good faith.

If a colleague or worker wishes to report issues anonymously, they can do so via an independent reporting line which is available online or by telephone 24 hours a day, seven days a week. This service is provided by Navex. The service is anonymous and no contact details are mandated.

**TEL:** dial +44 0800 890 011 then dial 833-646-1614

**WEB:** [dunelm.ethicspoint.com](https://dunelm.ethicspoint.com)

All reports are investigated by the Company Secretary or a member of her team, any issues resolved, and a response provided. A summary of reports received and the outcome is provided monthly to Dunelm's Executive Board and Group Board.

Any concerns relating to a colleague's terms and conditions of employment or disciplinary and grievance may be raised in accordance with **Dunelm's Grievance Policy** available on the colleague 'Home Comforts' intranet.

**Nick Wilkinson**  
**Chief Executive**  
**Last reviewed in September 2021.**