# Slavery and Human Trafficking Statement: Modern Slavery Act

#### Introduction

Wayfair is committed to combating modern slavery and human trafficking within the business and supply chain. This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and details Wayfair's actions to minimise the risk of slavery occurring in the operations and supply chains as well as relevant policies, training procedures, and action plans.

The term "Wayfair" as used in this Statement refers collectively to Wayfair Inc. and its subsidiaries, including Wayfair Stores Limited (Ireland) and Wayfair (UK) Limited, whose financial year ends on December 31.

#### Our organisation and supply chain

Wayfair is one of the world's largest online destinations for the home with a selection of furniture, decor, housewares and home improvement products. The majority of Wayfair products are shipped to customers directly from our suppliers with an increasing proportion flowing through our logistics network. Wayfair (UK) Limited is incorporated in England and Wales under company registration number 06776852. Our ultimate parent company is Wayfair Inc. which has its head office in the United States. Wayfair has over 16,000 employees in North America and Europe. For more information about Wayfair as well as our annual reports please visit our Investor Relations Page.

### Our policies on slavery and human trafficking

Our policy and practices reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Wayfair stands firmly against all forms of forced labour and human rights abuses. All Wayfair suppliers are bound by Wayfair's Supplier Code of Conduct, which states that Wayfair suppliers, and their supply chain, must uphold the human rights of all workers and explicitly prohibits any form of forced labour. The Supplier Code of Conduct along with our <u>Supply Chain Transparency Policy</u> and our <u>Code of Business Conduct and Ethics</u> reflect our commitment to combating slavery and human trafficking.

As part of our initiative to mitigate risk and ensure the adherence to applicable laws, Wayfair, amongst other measures:

- requires our suppliers to comply with applicable laws related to forced labour and human trafficking, as
  well as child labour, working hours, harassment, abuse, discrimination, product safety and factory
  security, in or as part of our supply chain.
- expects that all of our suppliers adhere to our Supplier Code of Conduct, which outlines Wayfair's expectations about slave labour, human trafficking and other social responsibility matters in their procurement and manufacturing processes. As part of this, our suppliers are required to attest in writing that they comply with our Supplier Code of conduct, the legal requirements of all of the countries in which we operate and the standards of the industry. Our suppliers shall not employ minors as defined by the relevant jurisdictions. Additionally, no worker at the employ of the suppliers shall be subject to any physical, sexual, psychological or verbal harassment or abuse. Wayfair also expects suppliers to take all necessary steps to provide a safe and healthy workplace and comply with all applicable laws related to wages and working hours. Further, suppliers must maintain formal written disciplinary procedures for employees related to the foregoing and clearly communicate them to all workers and prospective employees.
- integrates the Supplier Code of Conduct into its day-to-day operations. Wayfair's category management teams are familiar with the Supplier Code of Conduct and are best equipped to promote adherence to the requirements. Wayfair has developed multiple channels for escalation of any issues related to the Supplier Code of Conduct.
- recognises that sustainability is not only focused on the environment but also on people. Further details on this topic as well as corporate responsibility can be found here.
- views product-ingredient and sourcing transparency as paramount to the customer experience. For this
  reason, we have added a new search functionality and icon across our sites to demonstrate products
  that have sustainably-focused features. We actively partner with suppliers to provide more products
  like these across Wayfair sites.
- offers training to employees and management responsible for supply chain management to build understanding and capacity to identify and address slavery or human trafficking, as well as other social responsibility issues.

## Due diligence processes and supplier adherence to our values

As part of our compliance program, all suppliers are expected to comply with our Supplier Code of Conduct and failure to do so may result in the removal of the products from our websites and in certain cases, suspension or termination of the supplier's Wayfair account. All suppliers are subject to periodic audits, conducted by Wayfair or by a third party engaged by Wayfair. During this process Wayfair may request documentation, including any chain of custody documentation. All requested documentation must be provided to Wayfair within 48 hours of request.

If an audit demonstrates a violation of our Supplier Code of Conduct, the supplier is required to prepare and implement a detailed corrective action plan and take immediate steps to demonstrate compliance. Wayfair may also conduct follow-up audits to ensure that violations are addressed.

#### **Further Steps**

Following a review of the steps we have taken this year to combat slavery and human trafficking we intend to:

- continue to develop our mechanisms to assess measures in combatting modern slavery
- continue to update our supplier on-boarding and screening process
- continue to develop our training programs to increase business-wide awareness of modern slavery risks

In accordance with the UK Modern Slavery Act 2015 and guidance thereof, this statement was approved on 15th March 2024 by the Board of Directors of Wayfair UK Limited and signed by a Director.