



## ***Fighting Against Forced Labour and Child Labour in Supply Chains Act***

### **2023 Report**

#### **Introduction**

Wayfair is committed to fighting against forced labour and child labour within its business and supply chains. This Report is made by Wayfair LLC pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c.9 (“The Act”) for fiscal year January 1, 2023 through December 31, 2023. Unless otherwise specified, the term “Wayfair” as used in this report refers collectively to Wayfair LLC, a Delaware Limited Liability Company, its subsidiaries, and its affiliates (only Wayfair LLC is a reporting entity under The Act). Wayfair is subject to reporting requirements under supply chain legislation in other jurisdictions, including The United Kingdom’s *Modern Slavery Act 2015* and California’s *Transparency in Supply Chains Act*.

This Report details Wayfair’s steps to reduce the risk that forced labour or child labour is occurring in operations and supply chains as well as relevant policies, training procedures, and action plans.

#### **Our Organization's Structure, Activities and Supply Chains, and Supply Chain Risks**

Wayfair is one of the world’s largest online destinations for home with a selection of furniture, decor, housewares and home improvement products. Wayfair maintains a website that allows customers in Canada to purchase its products. The majority of Wayfair products are shipped to customers directly from our third-party suppliers, with an increasing proportion flowing through Wayfair's logistics network.

Wayfair’s ultimate parent company is Wayfair Inc., a publicly traded company that is headquartered 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](#).

Wayfair does not produce any of the products it sells. Therefore, the risk of forced labour or child labour exists principally in the supply chains of Wayfair’s third-party suppliers. Risk is higher for products that contain materials identified by government investigative agencies as carrying a greater risk of being produced by forced labour – such as certain locations of cotton production.

#### **Our Policies on Forced Labour**

Our policies 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 minimize the risk that forced labour is 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, among other things, that Wayfair suppliers, and their supply chains, must uphold the human rights of all workers and explicitly prohibits any form of forced labour. The Supplier Code of Conduct along with our [Supply Chain Transparency Policy](#) and our [Code of Business Conduct and Ethics](#) reflect our commitment to combating slavery and human trafficking.



## Due Diligence Processes and Training

As part of our initiative to mitigate risk and ensure the adherence to applicable laws, Wayfair, among 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 forced labour, child labour, human trafficking and other social responsibility matters in their procurement and manufacturing processes. Our suppliers are contractually bound to adhere to and comply with our Supplier Code of Conduct, the legal requirements of all of the countries in which they and 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.
- recognizes 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 responsible for Wayfair's relationships with its suppliers to build understanding and capacity to identify and address forced labour, as well as other social responsibility issues. Wayfair has developed resources to educate employees on the prevention of forced labour in our supply chains, including articles detailing our policies and reporting procedures and more formal training conducted for our management teams that own our supplier relationships. Wayfair will continue to look for opportunities to increase formal training in the coming year to ensure we are proactive in reducing risk.

## Monitoring 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 may be subject to 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. These audits are one of the ways in which Wayfair assesses the effectiveness of its social compliance program.

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.



## Remediation

During the 2023 reporting period, Wayfair did not identify forced labour or any loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour.

## Further steps

Following a review of the steps we have taken this year to combat forced labour and child labour we intend to:

- continue to enhance our processes to assess the effectiveness of our measures to combat forced labour,
- continue to update our supplier on-boarding and screening process,
- continue to develop our training programs to increase business-wide awareness of forced labour risks.


## Governing body approval and attestation

This report was approved by authorized representatives of Wayfair LLC on May 30, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Enrique Colbert, General Counsel

I have the authority to bind Wayfair LLC

DocuSigned by:  
  
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(Sign) (Date)