

A scenic landscape featuring a green field in the foreground, a well-manicured hedge, and a line of trees in the background under a blue sky with white clouds.

# Modern Slavery Statement

## 31st March 2021

**The WoolOvers Group**

**Woolovers PURE**  
COLLECTION



In accordance with the Modern Slavery Act 2015, the WoolOvers Group is pleased to make its first public statement of commitment to combatting human trafficking and modern slavery in our supply chains and business as a whole.

This statement covers the financial year ending 31st March 2021 and in this we make clear our actions and intentions to tackle this issue, the steps we have taken to mitigate the risks and our work towards fully eliminating Modern Slavery.

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## What is Modern Slavery?

- Modern slavery is the severe exploitation of other people for personal or commercial gain. It is when an individual deprives another of their freedom of choice and liberty. It is all around us, but often just out of sight.
- There are an estimated 40 million slaves across the world today, more than at any other time in human history. (source: TheWorldCounts)
- People become trapped into modern slavery often as a result of poverty and exclusion which makes them vulnerable to being tricked and exploited, often to working in factories, making clothes and farming crops. It is shocking to know that modern slavery is not something that only exists in far-flung countries but can also be closer to home with people working against their will for very little in return and with no control over their own lives.
- Modern slavery takes many forms. The most common are human trafficking, forced labour, debt bondage/ bonded labour, descent-based slavery and forced and early marriage.
- In terms of profit, Human Trafficking is ranked as the 3rd largest international crime industry – just behind Drugs and Arms Trafficking. (source: [www.ecpat.org](http://www.ecpat.org))

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## Modern Slavery Statement from the Chief Executive

WoolOvers has been an all-natural brand for over 30 years, caring passionately about the environment, our workers and our customers. We always strive to be completely ethical, honest and transparent in all that we do so we are committed to ensuring our suppliers work with high ethical standards and look after the welfare of their employees.

We recognise the inherent compliance risks of extended supply chains and we are proud of the steps we have taken so far to combat slavery. However, we know there is much more we can do and we will continue to assess and reassess our policies so that they are best placed to ensure there is no modern slavery or human trafficking in our supply chains, or in any part of the WoolOvers Group.

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# The WoolOvers Group Structure

WoolOvers Group Limited is the ultimate holding company of a group of companies, the main trading subsidiaries are WoolOvers Limited and Pure Collection Cashmere Limited.

WoolOvers Limited is an international direct-to-consumer clothing retailer, specialising in all-natural clothing.

Pure Collection is a direct-to-consumer retailer trading in the UK and the US, specializing in sustainable cashmere.

For the financial year ended 31st March 2021 the Group has a global annual turnover of approximately £44 million.

**The WoolOvers Group**







## Our Business

Our business is organised into a number of business units: Finance, Buying and Marketing, Creative, Logistics and Customer Care.

The Group has over 180 employees primarily based in the UK at its premises:

WoolOvers House

Victoria Gardens

Burgess Hill

RH15 9NB

We continue to grow as a business and recruit staff year on year.

## The WoolOvers Group



## Our Supply Chains

WoolOvers Group Ltd. works closely with approximately 15 key stock apparel suppliers based in China, Cambodia, Turkey, Portugal, Italy and the UK.

We care about the people who make our clothes. We forge strong partnerships based on shared ethics of honesty, transparency, trust and mutuality.

Many of our key suppliers have been working with us for 10 - 15 years. Producing an all-natural product in a world of man-made fibre is not commonplace and not every supplier can meet our exacting needs.

This longevity and continuity of supply enables us to support our sustainability goals and compliance improvements year on year. In addition, regular product team visits keep communication levels high, and despite the challenges that Covid-19 has brought, we continue to collaborate strongly on welfare issues and increase our commitment to full sustainability in both businesses.

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## Our Supply Chain Policies

### Code of Conduct

All of our suppliers must meet the standards set out in our Code of Conduct . We have chosen to use the code of conduct developed by the Ethical Trading Initiative (ETI.)

This base code is adopted widely in the UK by large and small companies and is founded on the conventions of the International Labour Organisation (ILO), which is an internationally recognised code of labour practice covering all the main areas for legal compliance safety and welfare.

The main principles of the base code are:

1. Living wages are paid
2. Working conditions are safe and hygienic
3. Child labour must not be used
4. Working hours are not excessive
5. Freedom of association
6. No discrimination is practised
7. Employment is freely chosen
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

## The WoolOvers Group



## Our Supply Chain and Internal policies (cont.)

We have established the following policies during the course of the year;

### **WoolOvers Group Anti-Slavery and Human Trafficking Policy**

This Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our name. We will always be transparent and honest in this.

### **HR Diversity and Inclusion Policy**

WoolOvers recognises the importance of creating a working environment where Diversity and Inclusion are recognised, valued and promoted because we know it is in the best interests of our business, our people and our community. We want all current, former and potential employees to feel that they are properly valued and treated equally and fairly.

### **Whistleblowing Policy**

We have established a policy to ensure that where an individual employee feels they need to raise a concern or an issue in a confidential way or if they witness any suspicious activity, they may do so without feeling they may suffer consequences.

## The WoolOvers Group







## Further Due Diligence Actions

- Mapped 100% Tier 1 Apparel Sites
- Conducted an in depth survey of all our stock suppliers' operations for Risk Assessment purposes
- Implemented a Modern Slavery Questionnaire with all apparel suppliers outlining our policy and requiring supplier signature
- Established a robust onboarding process for new suppliers which covers the standards and policies to which they need to sign up and adhere
- Ensured that all of our factories are audited annually by an approved independent auditor using globally recognised methodologies e.g. SMETA, BSCI
- Completed a full overhaul of our supplier manual which now include copies of our ethical policies and procedures and requires supplier signature
- Implemented a Modern Slavery training and awareness programme for all of our Buying, Quality Management and Merchandising personnel
- Strengthened our general trading Terms and Conditions and introduced a Non-Sub Contracting Policy, aware that this is where compliance often fails
- In 2019 we launched our 30th year Birthday pledges and these included our pledges on increasing sustainability and employee welfare (WoolOvers/pledges.com)

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# Further Steps

At the end of the current financial year, we will review the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, and outline further steps to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 31 March 2021. It was approved by the board on 9th June 2021

Signed: .....

Mike Lester  
CEO

The WoolOvers Group





