

# The WoolOvers Group

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COLLECTION

## Woolovers

**MODERN SLAVERY  
STATEMENT**

**2023/2024**

# The Woolovers Group

## Modern Slavery Statement

The WoolOvers Group publishes its yearly Modern Slavery Statement in accordance with the Modern Slavery Act 2015, and in conjunction with the Home Office Statutory Guidance from 2019. We continue to work hard across our business to beat human trafficking and modern slavery and this statement covers our financial year ending 31st March 2023, capturing the progress we have made.

### What Is Modern Slavery?

Modern slavery is a severe crime that violates human rights. It is the exploitation of other people for personal or commercial gain; it is when an individual deprives another of their freedom of choice and liberty. Modern slavery is all around us but often just out of sight.

There are an estimated 20-30 million people suffering in slavery, although it is hard to know the exact figure of a hidden population (source: The World Counts).

People are tricked and/or trapped into modern slavery, often due to poverty and exclusion, making them vulnerable to being exploited. It's troubling to know that modern slavery is not something that only exists in far-flung countries; it 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. An estimated number of 800,000 people are illegally trafficked across international borders every year. There are 161 countries affected by human trafficking. (source: [www.ecpat.org](http://www.ecpat.org))



# Modern Slavery Statement from the Chief Executive

WoolOvers has been an all-natural brand since 1989, when environmentalism was scarcely talked about. We have been caring passionately about the environment, our worker's welfare and our customers for 34 years. Being ethical, honest and transparent in all that we do is at the heart of our business.

We are absolutely committed to preventing modern slavery in our business. We understand the inherent compliance risks of extended supply chains and we know there is still more we can do. Getting back to "normality" in a post- pandemic world, we have our work cut out but 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. Our customer trusts us to be ethical and expects us to get this important issue right.

This last year has continued to be challenging with China lockdowns carrying into this trading year causing supply issues, coupled with other global supply chain issues, big inflationary pressures and the Ukraine war, all having an impact.

In 2023, we continue to focus on modern slavery as part of our Environmental, Social and Governance responsibilities and have dedicated employees across different levels who contribute to our ESG strategy and action plans. The team delivers updates to me in our Quarterly Budget Review meetings, which in turn are passed on to our investors.

Signed:



Mike Lester - CEO

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 2023.





## About the WoolOvers brand

Founded in 1989, WoolOvers is a British lifestyle brand that has been championing the use of natural fibres from the very beginning. Working quietly from our home in Burgess Hill in West Sussex near the beautiful South Downs, we have been designing and selling sustainable knitwear, clothing and accessories.

Our founders loved and lived in the country and believed in the virtue of nature's finest fibres such as cashmere, merino and lambswool and that there is no substitute for natural fibres.

In performance terms, they are durable, hypoallergenic, heat regulating and above all, naturally biodegradable.

In a topsy-turvy world that thinks manmade fibres are sustainable, we always prefer to tread as lightly on the planet as we can, keeping it natural, knowing that in a hundred years our product will not have contributed to the eco-system pollution we now all witness.

We continue to craft natural clothing, adding the comfiest of organic cotton, super warm yak hair and lightweight linens to our ever-growing collection. We know our customer appreciates looking good and importantly, feeling happy in the knowledge they are wearing a socially and environmentally aware brand.

## The WoolOvers Group Structure

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

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, specialising in sustainable cashmere and more.

Roama is a direct-to-consumer retailer trading in the UK, GE & US, specialising in sustainable activewear.

For the financial year ended 31st March 2023, the Group has a global annual turnover of approximately £45m.

## 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 220 employees primarily based in the UK at its premises

WoolOvers House, Victoria Gardens,  
Burgess Hill, RH15 9NB

## Our Supply Chains

Across all three apparel brands, WoolOvers Group Limited works with 54 suppliers in 12 countries - UK, Italy, Portugal, Turkey, Greece, Bali, Nepal, Philippines, China, Cambodia, Lithuania & India.

We are proud to have really close working relations with all our factories, and have been producing our ethical and natural product with some for well over 16 years. In a world full of man-made fibres, not all suppliers are capable of meeting our precise product needs, therefore these mutually strong relationships are vital. The longevity of these partnerships enables us to support our sustainability goals and improve compliance year on year. During the pandemic, overseas travel was curtailed but via new ways of connecting, we built even stronger ties. Instead of cancelling stock, our approach was collaboration and support during what was an incredibly challenging time for all in the industry.

Post- pandemic, we have emerged stronger and more focused on the need for transparent and mutual supply chain set ups. We continue to see annual audits for all of our factories and all their locations and we are now happy to be re-commencing travel to our supplier sites in person.

We carry out an annual modern slavery review with all suppliers and this supports us being able to understand what is going on for them , where improvements are being made and to identify areas of change or risk. Supply chains are long and complex, involving many organisations and individuals from the extraction of the raw materials and the dying of yarns, down to the final production. To aid transparency and reduce risks, we are mapping our supplier base and having already mapped our tier 1 suppliers in 2021/22, we are now focusing on mapping our top ranked suppliers down to level 2, for all of our apparel ranges, in all brands.



# Our Supply Chain & Internal Policies

## Our Code of Conduct (CoC)

All suppliers must agree to meet the standards set out in our Code of Conduct, our Terms and Conditions and our supplier manual, before they become a WoolOvers Group partner. These documents all include points that cover key issues surrounding modern slavery.

The WoolOvers Group has developed a CoC that follows the Ethical Trading Initiative's (ETI) base code and outlines standards that all our suppliers must adhere to. Our suppliers must agree to adopt and follow the ETI base code.

Founded on the conventions of the International Labour Organisation (ILO), the ETI's base code is an internationally recognised code-of-labour practice used by both large and small companies across the UK.

The core principles of the ETI base code are:

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

Without exception, we always set up partnerships with suppliers and factories that meet the high quality and ethical standards we set. Non compliance would lead to an automatic cessation of business.

Our on- boarding process is stringent and requires all suppliers to complete and sign our Modern Slavery Policy, Code of Conduct and Terms and Conditions, as well as other ethical compliance documentation.



## 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 community. We want all current, former and potential employees to feel they are 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 whistle blowing policy also helps mitigate issues that can promote modern slavery within our head office.

## Further Due Diligence Actions

- Further to completing our Tier 1 mapping, we have made good progress in starting to map our largest suppliers at Tier 2 level. Rolling this out to all key suppliers in all apparel brands is our focus this year. Our targets in this area suffered a set back with the disruption of the lockdowns at suppliers, but we are getting back on track now and this mapping will be a crucial step forward.

- We continue to carry out our annual modern slavery survey each year with all our suppliers to maintain the momentum and focus on this matter and to track progress in our suppliers' practices and to highlight risks.
- We are working to ensure that all of our factories who have Corrective Action Plans (CAPs) as a result of their annual audit, are supported to achieve any improvements needed within the annual audit window timeframe.
- We have conducted in house modern slavery training to create awareness within all teams and to help educate them on how to identify such practices. We are well aware that modern slavery can also occur in the UK, so it is important that teams who do not work directly with our suppliers, are also aware of the risks.
- We have included modern slavery awareness training in our company's induction programme.

