

# The WoolOvers Group

Woolovers roama PURE  
COLLECTION

## MODERN SLAVERY STATEMENT

2022/2023



# The Woolover’s Group

## Modern Slavery Statement

The WoolOvers Group is committed to publicising our yearly, Modern Slavery Statement. In accordance with the Modern Slavery Act 2015, we are diligent in all processes to combat human trafficking and modern slavery in our supply chains and whole business.

This statement covers the financial year ending 31st March 2022 and covers the actions that the WoolOvers group are taking to support eliminating modern slavery.

### 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 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 become trapped into modern slavery, often due to poverty and exclusion, making them vulnerable to being exploited. 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. 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 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 modern 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.

In the last year we have created a Corporate Social Responsibility team, formed of current employees across different levels, that are dedicating time each week towards our CSR strategy, which includes modern slavery. The team deliver updates to me in each Quarterly Budget Review meeting, 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 2022.







## 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 ‘Friends of WoolOvers’ who we have recently linked up with create homeware and garden accessories that are in keeping with our strong sustainability principles and enable us to offer well-made products to suit every part of our customer’s lifestyle. We believe in the ethos of buying well, so needing less.

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 true and natural fibres that are durable, hypoallergenic, heat regulating and above all naturally biodegradable.

Thirty-two years later, we are still passionate about slow fashion that is natural and sustainable. Our ethos is still to tread lightly on the planet. We continue to craft natural clothing, adding the comfiest of organic cotton, super warm yak hair and lightweight linens to our ever-growing collection. In the last year we have created ‘Friends of WoolOvers’, working with partner brands who share the same environmental ethos as ourselves.

We know that our customer appreciates the importance of looking great 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.

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

For the financial year ended 31st March 2022 the Group has a global annual turnover of approximately £56m.

## 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.

## Our Supply Chains

Across all three brands, WoolOvers Group Ltd works with 54 suppliers key suppliers in 13 countries. UK, Scotland, Italy, Portugal, Turkey, Greece, Bali, Nepal, Philippines, China, Cambodia, Lithuania & India.

We care about the people who make your clothes and work continuously to forge strong relationships with our suppliers, based on shared ethics of honesty, transparency, trust and mutuality.

We have worked with many of our key suppliers for over 15 years, producing ethically natural products. In a world full of man-made fibres, not all suppliers are capable of meeting our exacting standards, therefore these relationships are key. The longevity of these partnerships enables us to support our sustainability goals and improve compliance year on year.

For the last two years, the pandemic put a stop to our overseas travel. Despite this, we have maintained close contact with our factories via video calls, daily communication, and honest relationships. We have continued to request annual audits in accordance with our supplier manual and recently started to revisit suppliers where possible. We will visit more factories this year when borders reopen.

Our annual modern slavery questionnaire shows that the greatest risk of modern slavery exists within our apparel supply chains. These supply chains are long and complex, involving many organisations and individuals, from the extraction of the raw materials, the dying of yarns to the final production. We are working to help eliminate risks by mapping our supplier base. Having already mapped our Tier one suppliers, in 2022/2023 we plan to focus on mapping our tier 2 level suppliers of our top five factories, responsible for over 70% of our apparel range.





## Our Supply Chain & Internal Policies

### Our Code of Conduct

All suppliers must agree to meet the standards set out in our COC, our T&Cs and 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 Code of Conduct that follows the Ethical Trading Initiative (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 & 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

Within the WoolOvers Group we always seek out partnerships with suppliers and factories that meet the high quality and ethical standards we set.

Our on boarding process is stringent and requires all suppliers to complete and sign our Modern Slavery Policy, Code of Conduct and T&Cs, as well as ethical compliance documentation.

We send out our Modern Slavery questionnaire on an annual basis which requires all suppliers to submit information regarding their working practices and internal efforts to mitigate modern slavery within their facilities. We insist on up to date audits provided for all our factory locations and non-compliance of this would lead to the termination of that working relationship.



## 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

- In the last year we have completed the mapping of our direct Tier 1 suppliers and began the process of mapping Tier 2.

- Conducted a mandatory, in-depth questionnaire for Risk Assessment purposes to gather information on our suppliers' internal operations. The responses are used to help us identify risks within our supply chains.

- In the last year we have updated and resent our mandatory modern slavery survey to gain further transparency on our suppliers' practices.

This survey was completed by 100% of our direct suppliers; we will use this information to highlight risks, areas for concern and improvement within our supply chains, working with suppliers to target these issues through open communication, transparency, and collaboration.

- Established a manual for new suppliers covering the standards and policies which they must sign up and adhere to, ensuring completion of all forms and questionnaires.

- Required all current suppliers to re-sign our updated manual, that includes policies on ethical compliance, code of conduct & REACH (banned and restricted substances).

- Ensured that all of our factories are audited annually by approved independent auditors using globally recognised methodologies such as SMETA, BSCI and support in managing CAP report plans.

- Conducted in house, modern slavery training to create awareness within teams and to help educate them on how to identify such practices. 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.

- Rolled out our newly updated T&Cs that included a non-subcontracting policy. Our no subcontracting policy ensures that production cannot be delegated to factories we have no visibility on. This prevents suppliers using cheap, unaudited factories and facilities that could have high risk of modern slavery.