



DAMARTEX UK LIMITED MODERN SLAVERY STATEMENT 2023/2024

This statement has been published by Damartex UK Limited and has been developed in accordance with the Modern Slavery Act ("MSA") 2015. It sets out the steps we have taken in the financial period of 2023-24 to prevent modern slavery and human trafficking within our business and supply chain.

Modern slavery continues to be a growing global and economic issue. We believe it's unacceptable within our business and our supply chain. That's why we're dedicated to championing human rights, so we can challenge, identify and address modern slavery.

We're confident from the steps we've taken over the past 8 years, that we've made progress to mitigate the risk of modern slavery within our business and supply chain. For us, this is an ongoing process and we'll remain committed to supporting the eradication of this crime in our industry.

ABOUT DAMARTEX UK LIMITED

1 ORGANISATION STRUCTURE AND SUPPLY CHAINS

Damartex UK Limited is a subsidiary of the Damartex SA group of companies which is a multi-channel European business. The Damartex SA group predominantly develops and distributes quality clothing and accessories for seniors as well as home and lifestyle products.

THE DAMARTEX GROUP COVERS THREE SECTORS

Fashion brands



Home & Lifestyle companies



Healthcare:



[See Our Brands](#)

Our own brand and third party branded products are sold in the UK through online shopping and our catalogue, through postal and telephone orders. 453 skilled employees work across our UK head office in Bingley and our distribution centre in Steeton, both in West Yorkshire.

OUR SUPPLY BASE COMPRISES 3 CATEGORIES:

- 1** Internationally sourced products – clothing & footwear. We share much of our supplier chain with our parent group equating to 293 suppliers.
- 2** Our UK based sourced products – gift incentives and household goods. We have 60 active suppliers; the majority are UK importers and some agents who source on our behalf.
- 3** We have many suppliers of services and goods not for resale

2 POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The company is committed to delivering best practice in human rights and employment rights. We also demonstrate a high respect for the environment and fully support the fight against corruption in every part of the business, including our supply chain, as part of our responsible purchasing approach.

In this context, and within the framework of our purchasing policy, we require that our product suppliers comply with our Responsible Purchasing Sustainable Procurement Charter. An essential condition for our suppliers, without whom we could not enter into contracts.

The supplier guarantees compliance with this Charter, regarding the supply, manufacturing and transportation of raw materials and products on its own behalf and on behalf of its suppliers and subcontractors. Before placing orders with its own suppliers, or subcontractors, for products intended for the company, the supplier must ensure that the Charter can be adhered to by all parties.

By agreeing to work with us, the supplier acknowledges its social and environmental responsibilities and commits to complying with the principles set out according to the International Labour Organisation, the 10 principles of the United Nations Global Compact and national laws in the sustainable procurement charter including:

- The prohibition of forced labour and slavery
- The prohibition of child labour
- Trafficking in human beings (Modern Slavery Act)
- Compliance with decent working conditions
- Respect for the environment

Whistleblowing

The Damartex Group has a whistleblowing platform called “Transparency”. It is designed to offer colleagues, workers, contractors and third parties a confidential way to raise issues of concern. Transparency is there to help raise awareness and report any actions that appear detrimental to the ethics or integrity of a person or group.

Our business has compulsory online learning modules for both Inclusion & Diversity and Modern Slavery within our internal Learning Management System. Our colleagues receive annual refresher training with an emphasis on reporting. Both include a knowledge check at the end of the module and are designed to promote and encourage our business ethics. This includes our Transparency platform and how to use it.

Policies

The following policies continue to reflect our commitment to raising awareness of Modern Slavery within our business and supply chain. We recognise this is a journey and our policies will be reviewed annually to ensure that they reflect our culture and commitment from the business as we progress.

- Business Code of Conduct
- Public Interest Disclosure (Whistleblowing)
- Recruitment Policy

We have a Modern Slavery Policy which highlights our commitment to raising awareness of Modern Slavery and actions that our colleagues can take to report any suspicions or concerns they have.

3 DUE DILIGENCE PROCESSES

By 2030 the UK company and wider Damartex SA group's ambition is to have 100% of the products placed on the market from ethically audited factories. Currently we are at 76% for internationally sourced product and 87% for locally sourced product.

We've focused our due diligence on high-risk areas of our international product supply chain. In the financial year, 37 factories were visited by Damartex SA in person. These visits provide an initial CSR (Corporate Social Responsibility) review and will continue to be a focus in 2025.

Factories are audited by third party auditing companies including BSCI (amfori Business Social Compliance Initiative), SMETA (Sedex Members Ethical Trade Audit), ICS (Initiative for Compliance and Sustainability) and SA8000 (Social Accountability).

Factories are assessed on the following criteria:

- 1** Management system, transparency, and traceability
- 2** Minimum age, child labour and young workers
- 3** Forced labour
- 4** Discrimination
- 5** Disciplinary practices, harassment, and abuse
- 6** Freedom of association and grievance mechanisms
- 7** Working hours and overtime
- 8** Remuneration and benefits
- 9** Health and safety

Recruitment

When recruiting, we adhere to UK legislation to check "Eligibility to work in the UK".

We attended two webinars with Stronger Together (a not-for-profit organisation providing businesses with resources on the prevention of modern slavery), to further consolidate our understanding of what responsible recruitment is, including the business case and principles. An in-house workshop to train our key stake holders within the logistics warehouse operation was delivered to embed responsible recruitment within Damartex UK Limited.

- July 2023 - Stronger Together's 'Labour Exploitation in UK Warehousing' webinar (attended by Logistics Managers, H&S Manager & key modern slavery project team members).
- October 2023 - Modern Slavery Responsible Recruitment inhouse workshop (delivered to key warehouse managers at our Logistics site), to raise awareness of associated risks in recruitment practices related to modern slavery.
- October 2023 - Stronger Together Responsible Recruitment Forum (attended by key modern slavery project team members).

4 RISK ASSESSMENT AND MANAGEMENT

Our group Corporate and Social Responsibility department ("CSR"), in collaboration with our purchasing departments, maps out supplier risks and prioritises the factories to be audited according to several criteria:

- Country risk
- Supplier's weight in purchasing volume
- Availability of a valid social audit

The country risk is assessed using the ICS Country Risk Mapping methodology based on the 9 criteria shown in section 3. Most countries are classified according to 3 levels of risk: risky, medium-risk, and low-risk.

5 KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

In 2022-2023 our key performance indicators were assessed using the following parameters:

- **Number of concerns raised through the Transparency platform**
There were no issues raised through the Transparency whistleblowing platform in the 2023-24 period.
- **Training**
100% of colleagues to complete the Inclusion & Diversity and Modern Slavery training every year. This is annually reviewed and updated. This figure fell to 91% in the year 23/24.
- **Third party audits**
The total percentage of locally purchased products from ethically audited factories decreased on the previous year due to one of our main suppliers of high-volume products going into administration.
- **Board level awareness**
The board of directors, and the company's leadership team, include Modern Slavery awareness, incidents, and actions in their regular update meetings.

6 TRAINING ON MODERN SLAVERY AND TRAFFICKING

Here's a quick overview of our actions to monitor, prevent and train to manage incidents involving, or suspected of involving, modern slavery:

- 'Modern slavery' and 'Inclusion, diversity & belonging' e-learning courses.
- We raise awareness for our distribution and contact centre colleagues with digital communication of the modern slavery helpline in communal areas of the business across both sites.
- Anti-Slavery day awareness communication was shared among all colleagues in October 2023.
- As described under the due diligence section for recruitment, we undertook webinars and an inhouse workshop to gain more understanding of the challenges and complexity of Modern Slavery and how to recognize the signs and report it.

REVIEW AT DAMARTEX SA 2023-24

For the financial year, our focus was to redefine our Tackling Modern Slavery Strategy

Achieved

- Continued progress with ethical audits for locally bought products. Figures are also now recorded in our Damartex SA group Extra Financial Performance statement.
- International scope for factory audits has widened to include France and Belgium business subsidiaries and locally sourced goods.
- We continued to drive forward our Modern Slavery and Human Rights policies through refresher e-learn training, sign posting colleagues where to seek help and raising awareness through our internal communication systems.
- Engaging with Stronger Together to keep up to date with new developments and use their resources for the basis of our in-house workshop.
- Building updated notices: television, online hub, and posters.
- Drafted a sustainable procurement charter for non-product suppliers. The charter has evolved from the MS project team to demonstrate our ongoing commitment in addressing modern slavery. 'Our Supplier Charter - Service Supplier Non-Product'

is being introduced to those partner organisations who provide outsourced labour to Damartex UK Ltd. The purpose of the charter is to gain our partners commitment to share Damart's approach to responsible and ethical business ambitions, in relation to the provision of third-party workers.

- As members of ICS 'Initiative for Compliance and Sustainability' we used the provided tools to further train our suppliers on subjects such as forced labour, working hours and overtime.
- Progress has been made on the traceability project of our factory in Tunisia. A Sustainability Map has made it possible to identify the factory's subcontractors (dyers, spinners, etc.). Today, 39 suppliers are included in this map.
- Due to the new French law (n° 2017-399) we have introduced a vigilance plan, the main points of which (identification of risks and mitigation measures) form the outline of the Responsible Purchasing section of the CSR report:
[Damartex-DPEF-2023-ENG-version.pdf](#) (p.36 to 43)

Next Steps 2024-2025:

- All colleagues will be required to complete annual refresher training, with improved monitoring to attain 100% completion rate.
- Continued progress with ethical audits of our local product suppliers.
- Maintaining continued awareness and highlighting issues amongst our colleagues.
- Remaining current on developing worldwide issues relating to Modern Slavery and reviewing supplier location to ensure risk is minimised.
- Roll out of 'Our Supplier Charter - Service Supplier Non-Product' to partner organisations.
- Review our recruitment and onboarding process.
- improved monitoring on completion of eLearns and raising awareness through the leadership teams on completion rates within their department.

MOVING FORWARD

Through collaboration, compliance and constant reviewing of processes, we're raising the bar in tackling Modern Slavery. By introducing training, transparency and fully supporting the international legislation we are promoting respect, protection and sustainability across our business. We want to keep everyone who comes into contact with Damartex SA group companies, from employees to supply chain workers, safe from such abuses by taking opportunities to learn from others on how to protect freedom and preserve human rights.

For and on behalf of the Board of Directors



Jeanette Howard Jones
Co Managing Directors



Ed Friel

November 2024