



DAMARTEX UK LIMITED MODERN SLAVERY STATEMENT 2022/2023

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 2022-23 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 7 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 three group brands which are sold in the UK are Damart, Afibel and Sedagyl although Sedagyl stopped UK sales in December 2022.

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. 602 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 372 suppliers.
- 2 Our UK based sourced products – gift incentives and household goods. We have over 65 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 from 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

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 75% for internationally sourced product and 99% for locally sourced product.

We've focused our due diligence on high-risk areas of our international product supply chain. In the financial year, 41 factories were visited by Damartex SA in person. These visits provide an initial CSR review. With a continued focus into 2024, the number of factories being visited is back to pre-Covid -19 levels.

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".

Earlier this year, our Modern Slavery Project Team attended an 'Introduction to Responsible Recruitment' training and awareness course with Stronger Together (a not for profit organisation). The training consolidated understanding of what responsible recruitment is, including the business case and principles, with a view to rolling this out through internal training to key stakeholders within operational areas (in the coming year) and embedding responsible recruitment within Damart UK Limited.

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 2022-23 period.
- **Training**
100% of colleagues to complete the Inclusion & Diversity and Modern Slavery training every year. This is annually reviewed and updated.

- **Third party audits**
The total volume of international purchased products from ethically audited factories decreased on the previous year due to broadening the scope to include French and Belgium local suppliers as well as UK and common group suppliers.
- **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 2022.
- Our new starter and refresher training on Inclusion & Diversity and modern slavery has continued and we are introducing a specific e-learning course for our internal recruiters.
- Key team members from operational areas attended a training and awareness session facilitated by the Stronger Together organisation to gain more understanding of the challenges and complexity of Modern Slavery and how to recognise the signs and report it.

REVIEW AT DAMARTEX SA 2022-23

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 units for locally sourced products.
- We continued to drive forward our Modern Slavery and Human Rights policies through refreshener e-learning courses, sign posting colleagues where to seek help and raising awareness through our internal communication systems.
- Engaging with Stronger Together to deliver training and awareness sessions to key stakeholders.
- Building updated notices: television, online hub, and posters.

Next Steps 2024:

- All colleagues will be required to complete annual refresher training as previously.
- Continued progress with ethical audits of our local product suppliers.
- As members of ICS 'Initiative for Compliance and Sustainability' we plan to use the provided tools to further train our suppliers on subjects such as forced labour, working house and overtime.
- Implement a Traceability project of our own factory in Tunisia.
- Due to the new French law (n° 2017-399) we will endeavour to create a new due-diligence plan for international sourced product.
- 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 minimalised.
- Introduce an 'Employment Charter' and seek agreement from local and international employment / recruitment partners.
- Review our recruitment and onboarding process.

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

A handwritten signature in black ink that reads "Fiona Mannion". The script is cursive and fluid.

Managing Director Damartex UK

Dated Nov 2023