



# MODERN SLAVERY ACT

TRANSPARENCY STATEMENT

2022

dormole



Dormole is committed to ensuring that it trades ethically and is opposed to any form of unethical business, including modern slavery. We recognise that there are some businesses around the world that have employees subjected to slavery or who are victims of human trafficking. Such practices are completely unacceptable to us, both within our business and throughout our supply chain. We understand that it is our responsibility to identify and mitigate the risk of unethical practices and we work closely with all businesses we associate with to ensure this.





# INTRODUCTION

**This statement has been produced in accordance with the Modern Slavery Act 2015 and relates to the financial year ended 31 December 2022. It sets out the Modern slavery and human trafficking transparency statement for Dormole Limited, and its relevant group subsidiaries, which are collectively referred to in this statement as “Dormole” or, the “Group”.**

In producing this statement, we have had regard to The Home Office’s statutory guidance.

Dormole is committed to ensuring that the factories it buys goods from around the world treat their workers fairly and provide them with safe working conditions at all times, and that none of such workers are subjected to slavery, nor have been subject to human trafficking. We believe that fairness, honesty, integrity, loyalty and commitment should be at the heart of every business transaction, and we are committed to developing, and maintaining, the best possible environmental and ethical standards in all our business dealings. In turn, we are dedicated to continual evolution of our governance framework to ensure that our policies and processes adequately reflect our commitment to positive ethical practices.

This statement covers the activities of Dormole Limited and its subsidiary undertakings. This includes the following companies: C A Clemson & Sons Limited, Curtis Holt Limited, Finnie & Company Limited, Forgefix Limited, Harrison & Clough Limited, and Olympia Tools (UK) Limited.



## OUR BUSINESS AND SUPPLY CHAINS

Operating since 1972, Dormole is a leading distributor of hand tools, power tools, consumables, accessories, fixings, and fasteners, serving the UK, Ireland and certain countries within the European Union. Dormole strives to offer a service that is second to none, providing its customers with a comprehensive package of sales, promotions and marketing support.

The Dormole Group is comprised of a number of businesses, and brand identities.

While it predominantly distributes tools, fasteners, fixings and associated products to the retail, hardware and merchant trades, certain businesses within the Group are brand owners that import and distribute their own products. These businesses operate under their own brand identity but alongside the support of the Group's centralised resources and network. The Group's businesses have their own respective supply chains, sourcing products globally. In its review of the complete supply chain, the Group adopts a

risk-based approach and makes a conscious effort to apply greater focus to "high-risk" regions for modern slavery and other human rights issues.

For further details on the Dormole Group structure please see [www.dormole.net](http://www.dormole.net)



# POLICIES AND CONTROLS

The Dormole Group is committed to maintaining high ethical standards. Our governance framework is comprised of policies, procedures and other control mechanisms established to ensure a sustainable and ethical business. In addition to our supplier manuals and agreements, we maintain an Ethical and Code of Standards policy that sets out requirements for our suppliers in relation to slavery and human trafficking; child labour; working hours, pay and benefits; discrimination and abuse; health and safety; and environmental matters.

Our suppliers are expected to agree to this policy at the outset of our relationship with them and we verify their ongoing compliance with the obligations set out therein. In addition to this policy, we also maintain Group-wide whistleblowing; anti-bribery and corruption; mental health; right to work; safeguarding; health, safety and welfare; and environmental policies.





## WHISTLEBLOWING

We are committed to the highest possible standards of openness, probity and accountability. Our whistleblowing policy sets out the arrangements in place to enable our employees to raise serious concerns they may have about any aspect of the Group's operations, in confidence, and without fear of victimisation, subsequent discrimination or disadvantage.

The whistleblowing policy sets out the matters that may be reported against, including unethical practices. We are pleased to report that during 2022, no such reports were made.

## COVID-19 CHALLENGES

Although we had hoped that the impact of the COVID-19 pandemic would decline during 2022, it was only in the latter months that we began to see positive changes. During the year, international travel restrictions continued to disrupt our regular audit programme. As global restrictions lifted, regional lockdowns in China persisted, preventing access to the area, and factory closures further curtailed our audit visits. It is only at the time of writing this statement, in the very latter months of 2022 that regional lockdowns have been lifted, and there is hope that our usual audit schedule may resume during 2023.

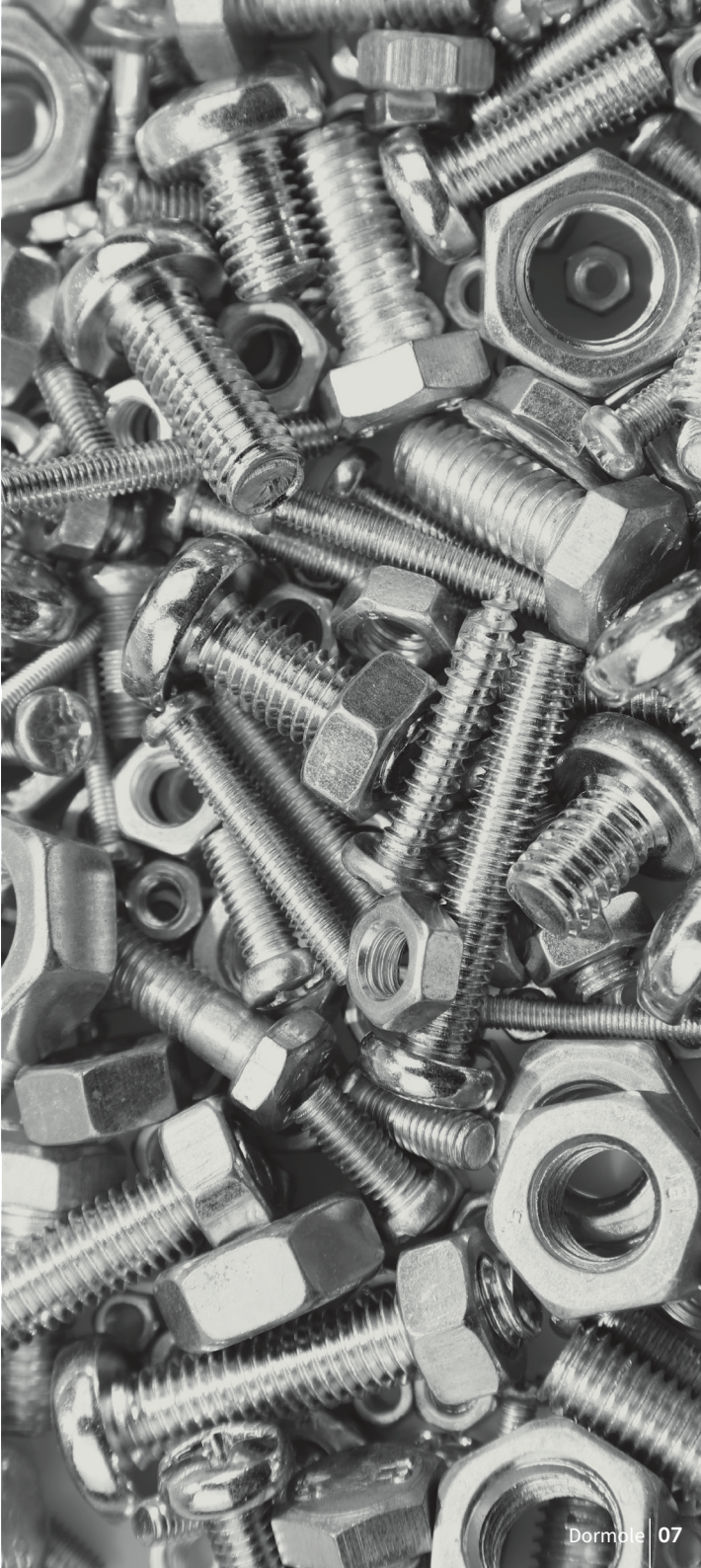


## XINJIANG

We are aware of the acts against Uyghur and other ethnic minorities in Xinjiang, where there is evidence of forced labour programmes. During 2022, we conducted a thorough review of our supply chain to ensure that we were not sourcing products from this region. We are pleased to confirm that no such links to Xinjiang existed.

## RUSSIAN INVASION OF UKRAINE

We note the Russian invasion of Ukraine, which unfortunately continues at the time of writing this statement. We have reviewed our supply chain and can confirm that there are no products directly originating from Russia. We do not trade or use services provided by Russian companies, nor do we have plans to source products and services from Russia in the future. As part of this review, we have also considered our compliance with all applicable sanctions imposed by the UK and Western Governments and Financial Institutions, with no issues or concerns identified.





## ACTIONS DURING 2022

Despite the restrictions on travel, we have remained in close contact with all our suppliers during 2022. This year has seen the introduction of Sedex across many of our businesses, which assists us in our risk assessment of suppliers and helps us to ensure that identified areas for improvement are appropriately actioned. Having completed our own self-assessments via Sedex, we have now begun to assist some of our existing suppliers in joining the platform. We have also established regular due diligence meetings where our businesses meet to discuss best practice from an ethical and governance perspective.

During the year, we have engaged third-party accredited auditors, including BSCI and SMETA to conduct factory audits. Risk and improvement areas are then uploaded to Sedex to ensure they are appropriately actioned. The core audit areas are ethical obligations, anti-bribery and corruption, equal opportunities, environmental requirements, health, safety and welfare, and quality assurance.

During the year, we also updated our supplier manuals, packaging manuals, inspection report and audit forms. Under usual circumstances, we aim to visit our suppliers 1-2 times a year, and our inspection report and audit form assists us in verifying our suppliers' ongoing compliance with our requirements. We also provide these documents to external auditors that we may engage to conduct supplier visits on our behalf. These visits are in addition to those conducted through our membership with Sedex. Several of our businesses are in the process of completing internal audits of non-Sedex suppliers without BSCI and SMETA audit arrangements. These audits are on track for completion before the end of 2022.

During these visits, we will also be communicating our new supplier manual and supporting documents and obtaining updated signed agreements.





## NON-COMPLIANCE

There were a few instances of supplier non-compliance during 2022, either through failure to meet our requirements or their inability to remediate identified improvement areas. In all such cases, we terminated our relationship with these suppliers and engaged new suppliers that were able to meet our requirements. Where non-compliance is identified, we assist our suppliers in carrying out appropriate remedial action that ensures non-recurrence in future. Where our suppliers can demonstrate an intention to implement such processes and an ongoing commitment to honour them, we retain our relationship.

When this is not the case however, we take a zero-tolerance approach to non-compliance, and our policy is to terminate such relationships.



# 2023 COMMITMENTS

## Group Audit Schedules

Each of our businesses will produce an audit cycle setting out on-site supplier visits to be conducted during 2023, albeit when it is safe to do so and when travel restrictions allow. This includes visits to both existing and prospective suppliers and will be conducted by a combination of internal management and appointed external auditors. These audits are focused on verifying the audit results on file, particularly in relation to ethical compliance, as well as additional product-focused inspections.

## Dialogue and Support

We will continue ongoing dialogue with our supplier base to assist them in signing up to Sedex and completing accredited audits via BSCI or SMETA.

## Monitoring Processes

We will continue our efforts to establish a measurable and reportable auditing and remedial action process through the use of key performance indicators and enhanced monitoring processes. We will also evolve our escalation process and incidents log.

## Evolution of Documentation

We will continue to evolve our supplier agreements and supporting documentation and will finalise the production of a standardised package of materials comprised of our agreements, trading terms, policies and codes of conduct. These will be provided at the outset of any supplier relationship, and our suppliers will be expected to agree to the requirements set out therein, evidence such compliance, and re-affirm such compliance each year.

## Ongoing Awareness and Commitment

We will provide modern slavery awareness training to management. We will continue to strive for improvements on all ethical, environmental, social and governance related matters.







This statement was approved on 16 December 2022 by the Boards of Directors of Curtis Holt Limited and Dormole Limited. It is signed by the Chairman of the Board of Directors of Dormole Limited.

Philip Lawrence  
Chairman  
Dormole Limited  
16th December 2022

The logo for Dormole, featuring the word "dormole" in a white, lowercase, sans-serif font. A thin white horizontal line arches over the letters "o" and "m", extending slightly beyond the left and right edges of the text.