



# MODERN SLAVERY ACT

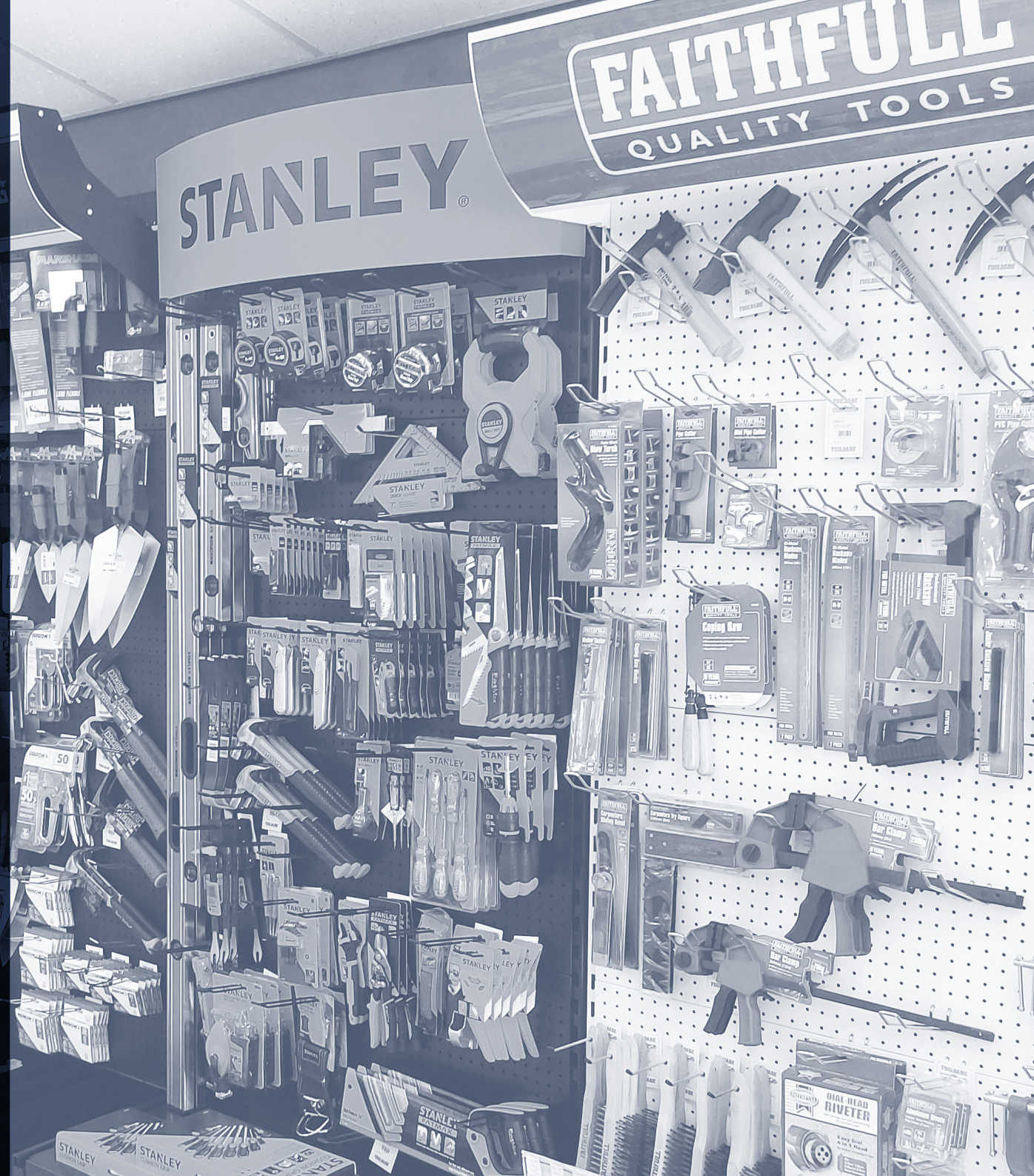
TRANSPARENCY STATEMENT

2023

The logo for dormole, featuring the word "dormole" in a lowercase, sans-serif font. A thin, curved line arches over the letters "dorm", and another thin, curved line arches over the letters "mole".



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 2023. 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)



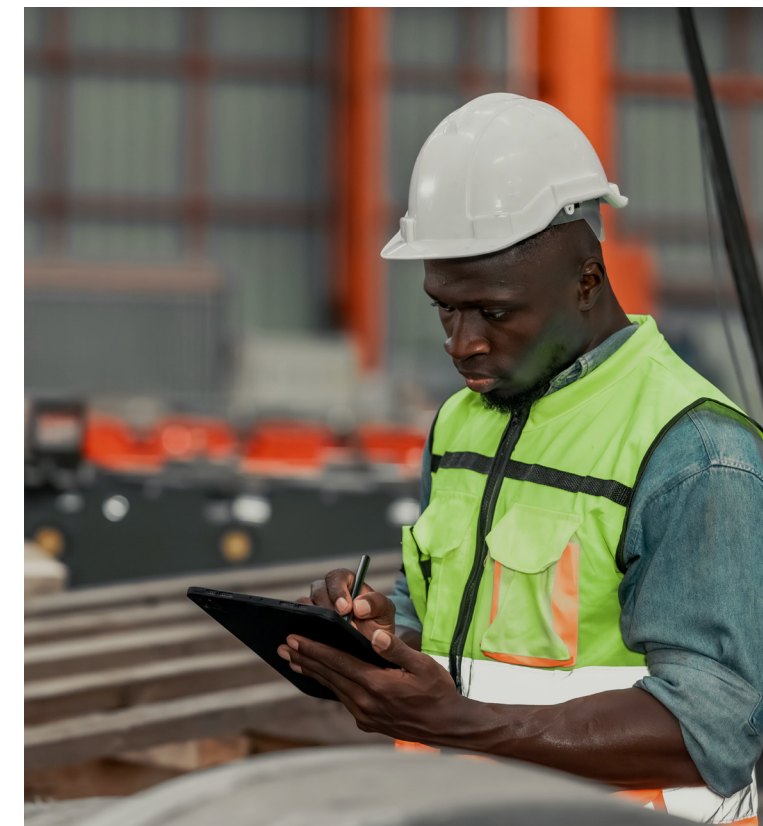
# POLICIES AND CONTROLS

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; antibribery and corruption; mental health; right to work; safeguarding; health, safety and welfare; and environmental policies. Our policies and processes are updated throughout the year to reflect emerging risks, and in response to legislative or regulatory changes. We have recently

updated our supplier audit forms to capture relevant European Directives, such as CBAM and Russian Steel sanctions.

During 2023, we appointed a Compliance Manager to (among other roles) maintain oversight of auditing and monitoring arrangements for the Group's owned tool brands. Since the introduction of this role, we have implemented a new reporting system that enables efficient monitoring of all areas of supplier compliance, including membership with Sedex and related audit results and remedial efforts. The reporting system also tracks completion of annual audits of suppliers domiciled in countries which have a higher associated risk of unethical practices. The reporting system also monitors the completion of supplier onboarding documentation, indicating whether supplier agreements and associated documents have been completed and signed. Our brand owners are continually developing products with best practice in mind and seek out high

quality suppliers. Our supplier agreements require that all new suppliers be registered (or agree to register) with Sedex and they must agree to be audited prior to any orders being placed. These controls help us to ensure that all new products are sourced from ethically sound manufacturers.





## 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 2023, no such reports were made.

## COVID-19 CHALLENGES

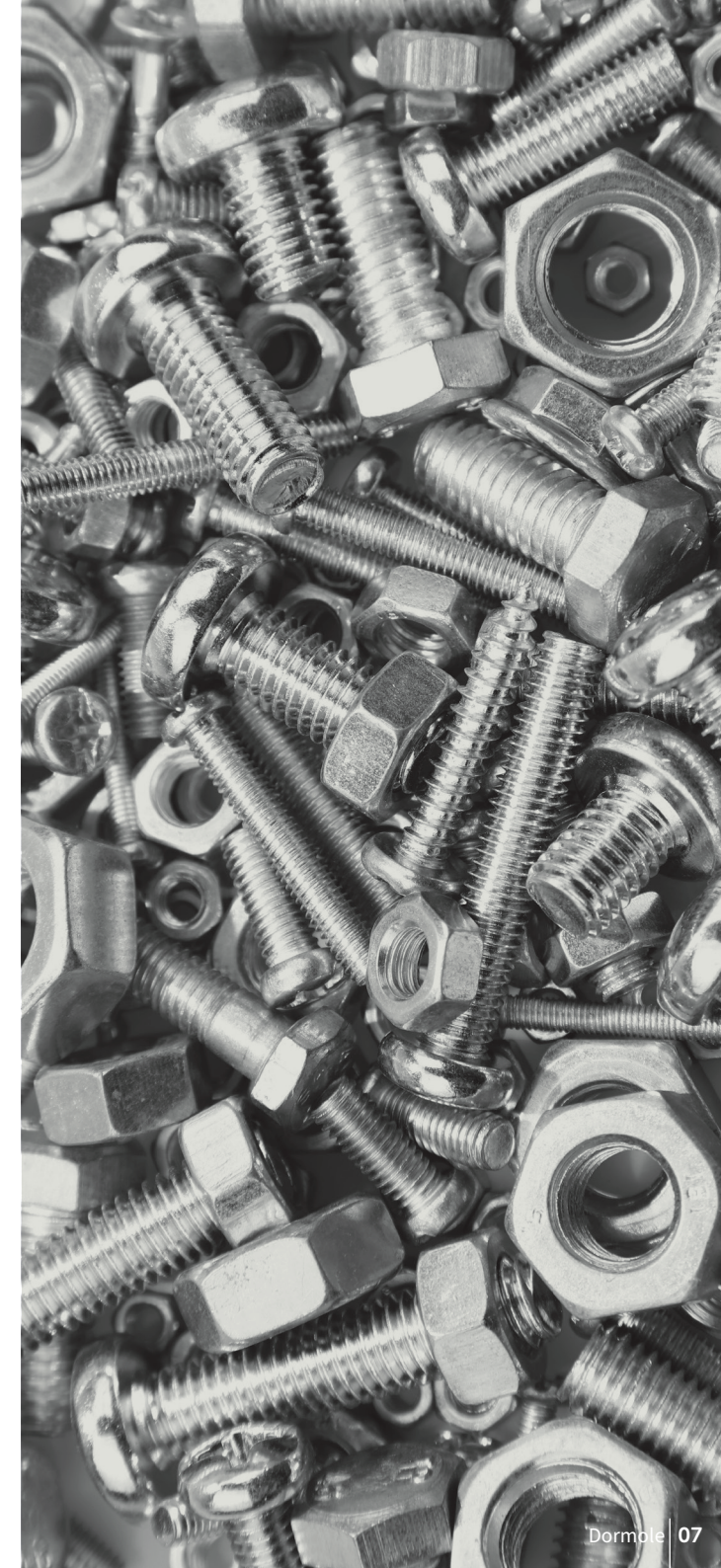
Much of the travel restrictions presented by the Covid-19 pandemic dissipated during 2023, enabling us to resume our regular audit programme. We therefore made a concerted effort to visit and audit factories across the Far East and India. These visits were conducted in addition to the audits conducted by Sedex and other third-party auditors we engage.



## RUSSIAN INVASION OF UKRAINE

Following the onset of the Russian invasion of Ukraine, we completed a business impact review to consider the impact the conflict might have upon our supply and what reliance we might have on Russian sourced products or services. The review confirmed that there were no products in our supply chain directly originating from Russia. It also confirmed that 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. We have also evaluated our supply chain to identify any products that fall within the scope of the EU and UK Russia Sanctions Regulations 2023, including the prohibition on the import of certain Russian iron and steel products processed in a third country or multiple third countries (the "Sanctions").

We have established additional due diligence to ensure compliance with the Sanctions, such as requesting Mill Test Certificates that prove steel origins, and implementing system controls that automatically flag in-scope products so that steel origins can be confirmed at the outset of an order. We have also trained our procurement and compliance teams on Sanctions compliance and the importance of ongoing monitoring throughout our supply chain. Where a supplier cannot meet our requirements, we have switched the source of supply to a supplier who is able to comply.



## ACTIONS DURING 2023

During 2023, we resumed our regular audit schedule. Our audits were conducted by third-party auditing partners that we have engaged for a number of years, including Sedex, BSCI and SMETA. Identified risk and improvement areas from all audits are uploaded to Sedex and our new reporting system, to ensure they are appropriately actioned. The core audit areas are ethical obligations, antibribery and corruption, equal opportunities, environmental requirements, health, safety and welfare, and quality assurance. In addition to these audits, our product teams also audited a sample of factories they had visited during the year. Outside of these audits, regular contact was maintained with our factories via videoconference meetings. In these meetings, our teams sought to confirm ongoing compliance with our policies, agreements and the relevant covenants contained therein, and they also sought clarity on questions deriving from developing regulatory and legislative requirements, such as those relating to environmental matters e.g., reduced carbon emissions/CBAM

reporting, and Sanctions compliance. During the year we held monthly due diligence meetings to discuss best practice from an ethical and governance perspective and to share insights across the Group. Our tool brands have also established regular compliance meetings with our Far East office to monitor and review all required actions concerning supplier ethical compliance. We have identified that consistent development of the legislative and reporting landscape in the EU and UK is putting increased pressure on factories – this will be a key consideration at meetings both internally, and externally with suppliers through 2024.

In 2022, we made it a requirement that all our suppliers be registered with Sedex. This has remained true through 2023, and we are currently in the process of onboarding several suppliers for our newly established tool brands. These suppliers will also be audited for compliance before orders are placed. Where our suppliers require it, we provide assistance with the

Sedex onboarding process, helping them to establish any necessary processes or controls. Membership to Sedex and BSCI/SMETA audits come at a cost to the supplier and in some instances, suppliers are reluctant to pay the associated audit cost. We are reviewing these cases and hope to reach a suitable solution in the coming months.



# NON-COMPLIANCE

We monitor the completion of all audits and work closely with suppliers to help them understand and implement any necessary remedial actions. Risk areas are categorised by severity, with non-compliance of certain ethical and welfare standards being considered business-critical i.e., a serious breach of our standards.

This year, we identified two suppliers who did not comply with our required ethical and safety standards. We worked with these suppliers to address improvement areas but in each instance, the supplier was either unable or unwilling to take sufficient corrective action. We have therefore ceased trading with these suppliers and are actively seeking suitable alternatives. Where our suppliers can demonstrate an intention to implement suitable remedial arrangements and an ongoing commitment to honour them, we retain our relationship. When this is not the case however, we adopt a zero-tolerance approach to non-compliance and our policy is to terminate such relationships.



# 2024 COMMITMENTS

## Regular Audit Cycle

In 2024, we will continue to ensure that a regular audit schedule is maintained and ensure that supplier audits are conducted on an annual basis. Additionally, we aim to have onboarded all suppliers from high-risk areas onto Sedex, with completed BSCI or SMETA audits by the end of Q3 2024. Alongside the auditing programme, we will continue to monitor for any non-compliances including those related to ethical trading and monitor that required actions are completed to remediate these.

## Increased Dialogue

Our teams will continue ongoing dialogue with our supplier base, and plan further trips to the Far East and India for factory visits. This will include visits to suppliers in China, to review any areas requiring or having previously required corrective action. We will continue to maintain regular contact with our supplier base to understand the challenges they face and to ensure we regularly review their ethical compliance outside of the regular audit cycle.

## 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.

## Reporting

We will continue to enhance our data collection and reporting capabilities to ensure a robust and evolving monitoring and reporting framework.







This statement was approved on 16 December 2023 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 2023

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