

## Modern Slavery Statement

<b>Applicability:</b>	<b>Sirdar/WATG/Rowan/Tilsatec/DMC</b>
<b>Date:</b>	<i>1<sup>st</sup> March 2024</i>

### Introduction

This statement is prepared pursuant to section 54 of the Modern Slavery Act 2015 and describes the steps that DMC Group Holdings Limited “DMC Group” and its subsidiaries have taken, and are continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chains. Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world.

At DMC Group we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking or any kind of forced or underaged work in our operation and supply chain. We continue on our journey to take concrete steps to tackle modern slavery, as outlined in this statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and the steps we have implemented to prevent slavery and human trafficking during the financial year 2023.

### Our business

DMC Group Holdings Limited owns **Sirdar** Group Ltd (**Tilsatec** Ltd, Sirdar Holdings Ltd, also encompassing the **Rowan** brand), **Wool And The Gang (WATG)** and Mouline’ & Co SAS (**DMC SAS**); collectively the group is known as the ‘DMC Group’. The DMC Group carries out its main activity in the textile industry and in particular in the manufacturing and distribution of yarn and embroidery products. The DMC Group also manufactures high quality technical yarns for cut and thermal resistant gloves.

The DMC Group employs in excess of 400 staff operating across seven sites. Overall the combined Group is a truly global company, with 47% of its sales in Europe and the UK, 42 % in North America, 7% in Asia and the Pacific region and 4% in the Rest of the World

### Our supply chain

Our supply chain includes cotton vendors, yarn vendors, accessories vendors, freight providers, warehouse providers, IT equipment and sundry suppliers whilst our clients include retailers, distributors and on line customers.

During the 2022 financial year, the Group has implemented a “Responsible Sourcing Agreement” signed by all WATG vendors, where Suppliers are required:

- to comply with all applicable local laws and regulations
- to comply with international standards with particular concern to child labour, animal welfare, environmental regulations and the Modern Slavery Act

Specifically in paragraph 4.1 of that agreement relating to the treatment of people, the agreement imposes:

- a ban on child labour
- the right to Freely Chosen Employment
- the right to Freedom of Association
- the provision of a Health & Safety work environment,
- a non-discriminatory work environment

- fair treatment of all the employees.

In 2023 we continued to develop the program of supplier consolidation (initiated in 2022) that takes in account social responsibility policies. As part of this consolidation exercise the DMC Group is committed to extend to all vendors by the end of 2024 the above “Responsible Sourcing Agreement”, prioritising the non-European Union Traded In suppliers (currently 41% of the total 2024 yarn projected purchase is already covered by the agreement).

Once in place we will look to conduct risk assessments (starting 2024) with our key suppliers to review:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- Their internal processes and stated own commitment to the eradication of Modern Slavery and human trafficking

This assessment will determine their ongoing suitability as vendors and the risk controls that we implement with them.

### Policies

DMC Group continue to invest in their people policies and training:

- We have a clear Whistleblowing Policy (called Speak Out) - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential email address that is monitored only by the Global HRD with escalation to the CEO to protect the identity of whistle-blowers.
- During 2023 the team published a Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them both when representing the business but also in their treatment of each other. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating domestically and abroad and managing our supply chain
- We continue to work hard on maintaining exceptional recruitment practices – our commitment to equal opportunities of employment, promotion and training for all is detailed in our Equality, Diversity and Inclusion Statement. Our recruitment processes relating to directly employed colleagues in the UK include vigilant checking of potential employee documentation to ensure individuals have the right to work in the UK. For temporary labour we work in tandem with partner agencies to ensure such Right to Work checks are also carried out by them prior to anyone working within the UK DMC Group. In other geographies, local legislation is followed.
- Employment Contracts – all our directly employed UK colleagues are provided with a transparent and fair contract of employment. The DMC Group continues with its project to bring these up to the latest standard of UK employment law. In other geographies, local legislation is followed as a minimum
- Pay practices – we have a global framework for pay reviews and off-cycle pay progression; by enabling as much transparency as possible around such processes we can ensure all of our colleagues can see equality of treatment and raise concerns if they wish

This statement covers the financial year 1 January 2023 to 31<sup>st</sup> December 2023 and has been approved by the CEO of DMC on 1<sup>st</sup> April 2024.

**Justin Wright**  
**CEO**

