



# Modern Slavery Statement

**VERSION 2022**

wolfcraft GmbH

## UK Modern Slavery Act Statement for Financial Year 2022

At wolfcraft we respect human rights and the dignity of individuals. We do not tolerate any form of modern slavery or human trafficking. While no supply chain is without risk, wolfcraft is vigilant in its effort to ensure that supply chains remain free of any form of modern slavery or human trafficking. In accordance with section 54(1) of the UK Modern Slavery Act of 2015 in the currently valid version, we outline our ongoing efforts to continue to prevent any form of modern slavery or human trafficking within our operations or supply chains. Toward this aim, we have commenced the establishment of a Supplier Code of Conduct. In future, it will be a binding document, substantiating our business relationships with our suppliers and sub-suppliers in all aspects of legal, ethical and morally correct action.

In 2022, the Supplier Code of Conduct (SCoC), begun in the previous year, was completed and sent along with an audit questionnaire to our largest suppliers.

In future, the SCoC will serve as a binding document, and concretize for our business relationships to all suppliers all aspects of legal, ethical and morally correct trading.

### 1. Organisation

wolfcraft is a family owned business, founded in 1949 by Robert Wolff. With 70 years' experience in the DIY business, we are dedicated to enabling DIYers to carry out renovations and value-adding projects to the home, garden, rental properties, and recreational spaces cost effectively and with professional results.

wolfcraft employs approximately 700 employees in total, both in manufacturing facilities located in Germany and Slovakia and in sales offices located in Germany, France, United Kingdom, Italy, Spain, Austria, and Poland.

We supply international retail chains and online marketplaces. Spare parts for our tools are maintained on hand for up to 10 years. This assists our customers and promotes sustainability. We would like to increase and expand our activities in sustainability and climate protection continuously in the coming years. Among other recognized standards, we orient ourselves on the sustainable development goals of the United Nations and regard them as guiding principles. In practice, this means we are converting our current plastic packaging to cardboard, increasing the recycling of production materials and taking greater account of energy efficiency and sustainability in our investment decisions.

## **2. Policy**

wolcraft has a clear company policy, not to work with suppliers suspected of or in risk of engaging in practices which are contrary to the MSA. We will not hesitate to sever relations with any supplier engaging in or utilising modern slavery or human trafficking. Our policy and our practice is to build long-term, ethical and sustainable relationships with our suppliers.

In 2020, we developed more structured repellants to any form of modern slavery in our supply chains and incorporated these requirements into our organisation. In this, we have recognized the value of our policy of long-term, sustainable supplier relationships. Our board is not only conscious of its relevance, but has supported the process by pledging more resources – human, technological and financial. Industry relationships and international information sharing are receiving more emphasis through formal collaborations with other DIY organisations through HIMA (AFEB Spain, BHETA UK, FEBIN Benelux, HHG and IVG Germany, INOHA France and MADE4DIY Italy).

Potential suppliers are investigated by trained purchasing and quality control specialists before engaging them. In the course of any collaboration, audits are conducted at regular intervals. They are also assessing their practices and seeking improved ways to systematize diligence, train staff and measure results. Any risk or suspicion of modern slavery or human trafficking is reported directly to our board and to appropriate authorities. We want to continuously improve our procedures and processes, in order to more quickly discover and more purposefully report any violations. This shall include clearer processes to enable workers and suppliers to raise concerns, and clearer grievance, whistleblowing, anti-corruption and anti-bribery policies. Internal trainings will be a component of our efforts, to maintain a high awareness of MSA-related themes.

Through our active membership in DICO e.V. (German Institute for Compliance) and participation in seminars, lectures and workshops, we are informed comprehensively of relevant innovations in compliance topics, facilitating our ability to incorporate such developments into our activities.

Throughout its history, wolcraft has been a family and employee oriented company. wolcraft has consistently valued and insisted upon ethical business relationships, integrity in relations with individuals and respect for human rights. This includes zero tolerance to slavery and human trafficking.

wolcraft is a member of the Association of German Tool Manufacturers (Fachverband Werkindustrie e.V., FWI) and a co-founder of the Home Improvement Manufacturers Association (HIMA), a consortium of DIY product manufacturers dedicated to safe, fair and socially and environmentally responsible practices in the DIY industry. wolcraft is furthermore a subscriber to the HIMA Code of Practice, introduced in 2014, in particular Principles 6, 7 and 8 which obligate members to sustainable development, information sharing on supply chain risks, and in particular to collaboration in eradicating any instance of child labour in the supply chain as well as basic quality of life standards (<https://hima.network/code-of-practice/>).

## **3. Due Diligence**

wolcraft, as a European company, operates within the framework of European and German law forbidding any form of modern slavery or human trafficking in supply chains. With our suppliers, we make our values known. Visits, inspections, audits, questionnaires and purchasing research have always been a part of our due-diligence efforts of our purchasing and quality-management departments. Our focus on long-term relationships remains key, ensuring that our suppliers, their practices and business cultures are known and have satisfied our standards.

New suppliers continue to be recruited with regard to their suitability for long-term, sustainable and ethical supply relationships. They are researched, investigated and visited by our experienced supply-chain and quality management professionals and selected according to their record of product quality and their quality of management, including ethical and human rights policies and practices. In 2020, our goal was to begin to find improved methods of assessment. Country of origin is reported as required by law and by request from our customers.

#### **4. Risk Management**

Though our manufacturing takes place predominantly within Europe, some of our suppliers are located in regions outside of Europe where increased risk is present. In these regions, traceability of supply chains become more difficult. In 2020, we began looking into better, more systematic ways to track our supply chain. These suppliers receive a higher level of scrutiny. Regions at highest risk as identified by recognised international indexes continue to be avoided. Increasing information sharing with HIMA partners supports these efforts.

#### **5. Effectiveness**

Our sustainable partnership approach is a most effective way to inhibit or prevent modern slavery or human trafficking practices. Yet, the value of implementing better assessment and reporting structures, including KPIs, to ensure sustainability came into focus in 2020. Still, as before, prior to entering contracts, visits, audits, questionnaires and inspections of our suppliers are carried out. Even after suppliers are engaged, we monitor suppliers on a regular basis for both quality and ethical working conditions. We look to strengthen our processes where necessary as part of our continuous improvement policy.

Planned supplier visits and audits for 2022 were not carried out due to COVID 19 restrictions. Though only partially able to compensate for such on-site audits, we remained in close contact with our suppliers through numerous video conferences. In view of ongoing travel restrictions in 2022, we expanded our audit documentation and questionnaires.

#### **6. Training**

Ethical risk awareness and best-practices have always been a part of our purchasing culture. Through the development of a Supplier Code of Conduct and the expansion of our auditing documents, as well as internal sensitization on the topics of MSA, human trafficking, ethically and socially correct action, we have been able in recent years to increase further the awareness of managers and employees at wolfcraft about these topics.

Furthermore, through service provider lawpilots GmbH, we have made legal and regulatory topics such as corruption prevention and anti-trust law understandable to our employees through internal e-learning tutorials.

#### **7. Sustainability**

We have implemented a software-supported documentation of current status in all environmental, social and corporate governance (ESG) sectors for the further concrete definition of goals and for operational sustainability management.

In addition, the conversion away from disposable packaging was begun. Also set in place was a wolcraft ESG Council. This council serves for the future steering, coordination and decision-making of our activities in matters of sustainability.

## Summary

The wolcraft board has formally recognised the importance of maintaining and developing improved measures to prevent, combat and eliminate any form of modern slavery or human trafficking from its supply chain.

The stringent following of current laws and norms as well as active participation and compliance in SEDEX and TÜV standards, membership in FWI and HIMA, the Global DIY-Network and other recognized institutions, is one essential aspect of this efforts. We are reinforcing our strategy of focusing on long-term, sustainable supplier and customer relationships to support our policy of combatting modern slavery and human trafficking in our supply chains. The consequent evaluation and control of our suppliers is an additional and important part to ensure the standards within our supply chain.

Our cooperation with DIY industry associations such as FWI and HIMA, information sharing and the collaborative setting of standards for an ethical, sustainable DIY industry remains a good way to raise awareness of any new risk areas, best practices or improving standards for our supply chain. Lastly, more systematic scrutiny of suppliers and developing more comprehensive internal training were an important part of our effort in 2020 to maintain ethical and social standards in our supply chain.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Slavery and Human Trafficking Statement for the financial year ending 31 December 2021.**

This statement has been approved by the Board of Directors of wolcraft GmbH and signed by managing directors Reinhard Wolff, Bernd Weber, Stefan Weigel and Holger Placke on 27.02.2023.

Reinhard Wolff

Managing Director wolcraft GmbH

Bernd Weber

Managing Director wolcraft GmbH

Stefan Weigel

Managing Director wolcraft GmbH

Holger Placke

Managing Director wolcraft GmbH