

UK Modern Slavery Act Statement for Financial Year 2020

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. For 2020, our efforts became even more systematized and these brought into implementation.

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 facilites 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.

Policy

wolfcraft 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. Throughout its history, wolfcraft has been a family and employee oriented company. wolfcraft 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.

wolfcraft 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. wolfcraft 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/).

Due Diligence

wolfcraft, 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.

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.

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.

Training

Ethical risk awareness and best-practices have always been a part of our purchasing culture. In 2020, initial steps were taken to develop specific training seminars on modern slavery and human trafficking awareness for both new and experienced staff and for suppliers. This is part of our approach to continuously ensure the awareness within our supply chain and our own staff.

Summary

The wolfcraft 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 membership in SEDEX, REACH, ISO, and 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 2020.

This statement has been approved by the Board of Directors of wolfcraft GmbH and signed by managing directors Thomas Wolff and Reinhard Wolff on 22 February 2021.

Thomas Wolff

Managing Director wolfcraft GmbH

Reinhard Wolff

Managing Director wolfcraft GmbH