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Modern Slavery Act Transparency Statement

Triumph International Slavery and Human Trafficking Statement 2019

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It constitutes Triumph International's slavery and human trafficking statement for the financial year 2019

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking.

Triumph possesses subsidiaries around the world, covering significant parts of its value chain from design to selling. Throughout our history, we were able to demonstrate our sense for fashion, excellent insights into the individual desires and changing needs of our consumers as well as a caring and engaging approach to our employees and society.

For close to 135 years, Triumph continuously strived to recruit new talent, offering them one of the textile industry's most international working environments, excellent conditions and great development opportunities in an ever-evolving company.

Triumph has always been fully committed to respecting, promoting and protecting Human Rights across its entire value chain, this being one of the main pillars of its business model. Triumph does not tolerate any form of modern slavery or human trafficking in its organization or in its supply chain, and undertakes to play an active role in promoting Human Rights and in proactively working towards the respect thereof.

We manufacture in socially compliant and high tech production facilities, a number of them owned and operated directly by us.

Since 2012, our organisation has been an active participant of the amfori Business Social Compliance Initiative (BSCI), which supports companies to drive social compliance and improvements within the factories in their global supply chains.

We endorse the Triumph Code of Conduct and, as an amfori BSCI Partner, we endorse the BSCI Code of Conduct and its terms of implementation and cascade them through our supply chains.

For more, detailed information please visit: <http://www.triumph.com/uk/en/7753.html>

Organizational structure

International

The Triumph Group, one of the world's leading intimate apparel companies, has been founded in Germany in 1886. Today, it is headquartered in Bad Zurzach (Switzerland) and continues to be a fully privately owned company.

Triumph today enjoys a presence in over 120 countries all across the world. For its brands Triumph, Florale by Triumph, TriAction by Triumph and sloggi the company develops, produces and sells underwear, lingerie, sleepwear and swimwear.

Triumph supplies 40,000 wholesale customers worldwide and sells its products in 4,050 controlled points of sale as well as via several own online shops.

UK

Triumph supplies around 300 customers in the UK and Ireland across different sales channels such as wholesale, e-commerce, distant retail and via our own Triumph and Sloggi web sites. Currently Triumph employs 53 people in UK.

Supply chain structure

Many of our products are manufactured in four Triumph own manufacturing facilities. Trusted and reliable partners in Europe, Africa and Asia, with whom we have typically collaborated for several years, are producing the rest. Our third party finished goods are continuously evaluated on various criteria including compliance. We expect our suppliers to comply with legal requirements as well as environmental and social standards and our Code of Conduct. With this in mind, we work to continually adapt the supply chain and to ensure an even closer partnership with all our selected suppliers. We also continuously monitor the human rights situation in all countries where we source directly and indirectly and ensure compliance on this matter.

Internal Policies, procedures and contractual controls

Triumph is committed to conducting our business in a legal, responsible and sustainable manner that is ethically sound and concerned about the welfare of our people, communities, our stakeholders and the natural environment. Our Policy Framework sets the context within which we wish to sustain our successful business. It contains the principles and rules of corporate conduct to guide behaviour both within and outside of our company.

As an amfori BSCI Partner, Triumph has developed the necessary management systems, policies and procedures to effectively prevent and address any adverse human rights impact that may be detected in its supply chains.

Social Compliance Policy:

Our Social Compliance Policy was originally rolled out in April 2012 in order to increase visibility, transparency and risk manageability for Finished Good Suppliers by providing a single and structured approach to identify, evaluate and, if necessary, disqualify suppliers.

Since then, we have implemented governance and compliance standards to uphold our commitment accordingly.

Simultaneously, Triumph joined amfori BSCI in 2012 in order to drive sustainable improvements of labour and workplace conditions by adhering to both our own Code of Conduct as well as amfori BSCI's Code of Conduct, which include prevention of servitude, forced, bonded, indentured, trafficked or non-voluntary labour.

Business Ethics Guidelines:

Our values, principles and codes of conduct ensure that expectations around ethical behaviours are clear, monitored and that specific corrective actions are implemented in case of any violations.

For more, detailed information please visit: <http://www.triumph.com/uk/en/7753.html>

Due diligence and remediation in our own business and supply chains

As an amfori BSCI Partner, Triumph commits to acting diligently in (a) assessing actual and potential adverse impacts of our business against the values and principles of the amfori BSCI Code of Conduct; (b) identifying throughout the supply chain where the most significant risks for these adverse impacts may occur and (c) acting upon them with the aim of preventing and/or addressing them in line with the amfori BSCI Code of Conduct.

In this context, we have undertaken the following due diligence steps:

Mapping and monitoring our supply chains

- We have gathered and assessed reliable information about our business partners' responsible behaviour, among others by using amfori BSCI audits. In 2019, there were 89 audits being arranged on our business partners, out of those 67 were BSCI audits and 22 in cooperation with other audit schemes such as WRAP, Better Works and SMETA etc.

Some factories were not audited in 2019 due to the following reasons:

- Factories are located in low risk countries like Japan
- Factories' audits were still valid in 2019
- We have continuously requested that all our significant business partners sign the amfori BSCI Code of Conduct and Terms of Implementation and asked them to pass it on to their own significant partners, creating a positive cascade effect.
- We have also evaluated the risk of new suppliers by visiting all new factories in different teams, having human rights, health and safety taken into account before starting production there.
- In addition, the Triumph own compliance team arranged 19 factories visited (announced and unannounced), covering countries like China, Cambodia and Vietnam.

Grievance mechanism and worker's involvement

- Our organisation has put effective grievance and whistle blowing mechanisms in place as per the amfori BSCI Code of Conduct for individuals and communities who may be adversely impacted by our organization's activity, including potential or factual forced labour.
- We have set up an integrity hotline (integrity@triumph.com), which is an independent and confidential channel for receiving information relating to improper business conduct and open to both Triumph employees as well as third parties. Moreover, a solid partnership with our social partners as well as regular mutual feedback further reinforces this as well.
- • In addition, being an amfori BSCI participant, any third party can lodge a grievance about our amfori BSCI implementation activities through the amfori BSCI Grievance Mechanism [system@amfori.org].

Incidents of forced labour and remediation

Through amfori BSCI audits, we have not identified any case of unacceptable performance under the heading of bonded labour. This means, among others, which we have not been made aware that any of our business partners or own facilities have failed to:

- a) exercise due diligence to avoid engaging in any form of bonded labour – particularly when recruiting migrant workers directly or indirectly;
- b) implement prevention procedures and build knowledge to prevent forced labour and human trafficking through hiring;
- c) enforce vigilance to avoid inhumane or degrading treatment – including through disciplinary procedures.

In addition, through amfori BSCI audits, we have not identified any case where the auditor alerted us of flagrant bonded labour or human trafficking that required imminent remediation from our side.

Stakeholder engagement and industry collaboration

- Being an amfori BSCI participant, we are part of an industry wide network that we use to work collaboratively and exchange lessons learned and solutions in a pre-competitive basis

Assessment of Modern Slavery risk within our business and supply chain

To understand where we have the biggest risks, Triumph has undertaken the following risk assessment steps both in our own organization and in our supply chain:

With the help of the amfori BSCI tool, we have identified the severity of the risk in different sourcing countries. For countries with high risks (like China, Vietnam and Cambodia) our social compliance team would - apart from arranging the social compliance audit regularly (i.e. at least once a year generally) - with due diligence also arrange visits regularly for on-site evaluation. This is done to better understand the social compliance status of the factory which includes the evaluation on human resource policies, recruitment practice etc.

Country Risk Classification:

Assessment of our effectiveness in preventing and combatting Modern Slavery

We are well aware that risks concerning forced labour, human trafficking and slavery are not static, therefore we regularly track, measure and evaluate our internal due diligence processes to better understand our performance, progress, effectiveness, remaining risks and impact of our own operations and those of our business partners.

The amfori BSCI Commitment Formula helps Triumph to define overall goals and targets to assess our progress in achieving them. Combatting Modern Slavery, we recognize the following key targets to be monitored:

- Our own staff increases awareness of forced labour and human rights risks, particularly those related to forced labour and human trafficking.
- Our supply chains' business partners show continuous improvement, particularly with regard to the amfori BSCI Performance area on bonded labour.

Assessing the effectiveness of our measures on a regular basis helps Triumph to maintain efforts that have proven to be successful and allows the exploration of innovative solutions when needed.

Training and further steps

At Triumph, our employees are introduced to our Codes of Conduct, trained on our values and principles and asked to familiarize themselves with our corporate policies.

In addition, every finished goods factory is introduced to our Code of Conduct. Factories, which are audited on BSCI system, are further expected to cascade amfori BSCI's Code of Conduct down their supply chain to further drive awareness beyond the first tier. We also encourage our factories to partake in one of the many amfori BSCI workshops to further reinforce amfori BSCI's Code of Conduct.

Training sessions on Social Compliance and Modern Slavery have been done for around 140 employees out of Sourcing (finished goods and material), Vendor Management, Material Development and "On site" Quality auditors in our development centres in Hong Kong and Heubach (Germany).

Going forward, we are planning to instil the concept of human rights and modern slavery more specifically into our business partners down the supply chain.

This statement has been approved by the Global Head of Supply Chain on 5th of October 2020 and constitutes Triumph International's commitments to avoid slavery and human trafficking for the financial year ending 2019.

Martin Kemmler

Global Head of Supply Chain

ONLINE-SHOP HOTLINE

For questions concerning your order in the Triumph Online Shop

Mon – Fri

7 am – 7 pm

Phone

+44 (0) 20 - 3455 0066

(Calls will be charged as local calls from a land line. Prices from mobile phones may vary)

E-mail:

uk.service@triumph.com

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HOTLINE

For questions concerning your purchase in retail or wholesale as well as for the Triumph brand and products

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customer.services@triumph.com

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