

MODERN SLAVERY STATEMENT

OCTOBER 2021

OUR COMMITMENT

Good Ethics is a key brand pillar here at White Stuff.

Our policy is based on three goals:

Traceability - knowing where our products are made throughout our supply chain

Responsibly Sourced - checking conditions for workers and improving our purchasing practices

Sustainable Fabrics - always looking for ways to minimise our environmental impact

Despite the ongoing impact of the Covid-19 pandemic this past year, including national lockdowns and a ban on international travel, White Stuff and our suppliers have worked together as one team with a continued business commitment to maintaining good ethical practices.

We continue to collaborate with our suppliers, and other organisations, by finding ways to adapt to new technologies and audit methodologies to ensure we have monitored risks whilst having a reduced number of specialists on the ground.

This statement outlines the work we have carried out in our full financial year ending 1st May 2021 and has been approved by the board of directors.



Jo Jenkins – CEO, White Stuff Ltd
October 2021

OUR ORGANISATIONAL STRUCTURE, OUR BUSINESS & OUR SUPPLY CHAIN

Established in 1985 and privately owned by our original founders, White Stuff Group Limited is a UK- based multichannel fashion and lifestyle brand.

White Stuff Group Limited includes the main UK trading company, White Stuff Limited, and White Stuff (Germany) GmbH, the German trading company. Our turnover for our full year ended 1st May 2021 was £94.2 million.

We have:

- 118 shops in the United Kingdom
- 26 UK concessions
- 19 international concessions, 10 in Germany, 9 in Belgium
- 8 shops in Germany
- 883 UK and Ireland wholesale & international wholesale accounts
- Our websites (whitestuff.com & whitestuff.de)

White Stuff employs 1,137 people across our UK and international shops, concessions, our Leicester distribution centre and the London Head Office. We have 100 direct product suppliers and 400 active non-product suppliers, including recruitment agencies, logistics and shop fitting services. Our suppliers are chosen because of their skills and good ethical credentials, each having signed up to our Code of Conduct. Our Code has clauses which are relevant to the legislation including no forced labour or child labour. Our products are manufactured in 136 factories across 14 countries.

GEOGRAPHY OF OUR FIRST-TIER FACTORIES

Supplier Country	Number of factories	Supplier Country	Number of factories
Bangladesh	11	Philippines	1
Cambodia	3	Portugal	7
China	42	Tunisia	2
India	40	Turkey	18
Italy	1	United Kingdom	4
Nepal	2	Vietnam	1
Sri Lanka	3	Spain	1
		Total	136

OUR SUPPLY CHAIN DEFINITIONS

	First Tier	Second Tier	Third Tier	Fourth Tier
Description	Factory that supplies direct to White Stuff.	Supplier of components or processes to first tier factory.	Supplier of components or processes to second tier factory.	Raw material suppliers.
Processes	Cutting, sewing (including subcontractors), knitting and packing and shipping of White Stuff products.	Laundry, garment dyers, fabric mills, dyers and printers. Buttons, zips, threads.	Yarn ginning, scouring, bleaching spinning, blending, dyeing.	Cotton, wool, linen farmers, man-made fibre.
Mapping Status	Full visibility. Working conditions checked regularly with improvements implemented.	Limited/Partial visibility. No further mapping has been achieved during the past year.	Starting to map during 2019 - 2020. No further progress has been made.	Started to map through our sustainable cotton programme.

The table above explains the tiers in our supply chain. Understanding and identifying secondary tier production sites is a vital step in modern slavery risk mitigation. Further down the supply chain, informal labour is more prevalent, which can exacerbate the likelihood of modern slavery.

Sustainability of the materials we use is a key focus of our product teams, this also helps increase the visibility of the lower tiers. Raw material production, particularly agriculture, is an area with many practices that can lead to a higher risk for modern slavery occurring.

We have made a commitment to use only sustainably sourced cotton in our products by 2024. While sustainability does not necessarily affect the risk of modern slavery, the programmes we have selected help to increase visibility of our supply chain further down the tiers. Our partnership with Fairtrade allows us to independently verify that farmers are paid a fair price for their cotton. It allows us traceability to the co-operatives from which we have sourced.

Over the next year we aim to further increase our visibility of our second-tier supply chain and begin the third and fourth supply chain by starting a new accreditation training programme. We will begin with our key suppliers in India, Bangladesh & Sri Lanka.

OUR POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

Our internal policies are designed to educate and enable people to put our values into practice.

Our own business policies relating to modern slavery are

- the Anti Bribery and Corruption policy
- the Whistle Blowing policy
- the Equal Opportunities policy
- the Ethical Sourcing Code of Conduct

It also outlines a clearly defined procedure for our workers to follow if they witness any suspicious activity. In addition, this year, we have initiated an anonymous online feedback portal which allows all colleagues to post comments, feedback and complaints in total anonymity with questions and answers published. This mechanism, as well as regular listening groups with our CEO and People Director, are now a permanent fixture and both have led to an increased culture of transparency.

Our supply chain policies that outline our standards are:

- the Auditing Manual
- Supply Chain Commitment Policy

This year, our directors endorsed a supply chain commitment policy, which has a focus on worker empowerment. This commitment will drive our work to detect where human rights are not being effectively realised, which will include minimising the risk of modern slavery.

OUR DUE DILIGENCE PROCESS

Our Supply base is risk-assessed using the guidance from the United Nations Guiding Principles (UNGPs).

A key part to the UNGPs is for businesses to support member states in protecting human rights and we also act to provide remediation where we need to do so. We do this through our membership of the ETI.

The ETI secretariat and its members are dedicated to advocacy and regularly provide submissions to governments to influence policy on behalf of workers. We fully support and engage with this work. We will only allow production to commence in factories that have been through our on-boarding process and show their commitment to our ethical sourcing policies.

PARTS OF OUR BUSINESS AND SUPPLY CHAINS WHERE THERE IS RISK

Risk assessed	Specific risk in our supply chain identified	What we are doing	Next steps
Refugee Labour	Undocumented refugee labour in Turkey	Unannounced audits and training our product teams, auditors and suppliers. Develop our refugee remediation policy.	Continue audit programme and refresher awareness training. Training of new suppliers on remediation & policy.
Child Labour & Bonded Labour	The practice of 'sumangali', in mills, Tamil Nadu, India. Child labour used in cotton fields in India	Education of our own team through our ETI membership	Continue first-tier accreditation programme in India
Informal Labour	Increased number of workers without contracts in secondary tier factories in India	Continuing our first-tier accreditation programme in India	Start our new training programme for second tier suppliers in India, Bangladesh & Sri Lanka
Migrant Labour	Migrants promised jobs that aren't as described, debt bondage for recruitment and travel costs. Migrant workers not understanding their rights & lack of access to support in India, Cambodia, China & Turkey	Keep informed through ETI membership and collaboration	Raise our suppliers' awareness of grievance mechanisms
Agency / Contract Labour	Job insecurity can leave workers vulnerable. Agency practices can sometimes not be transparent with risks of debt bondage. Highest risk China, India, Turkey and UK	Continue to detect through ethical audits	Training of risks in our first-tier accreditation programme

OUR OWN UK BUSINESS

We recognise that risk is not limited to our global supply chain and modern slavery is very much present in the UK.

We therefore take into consideration our DC in Leicester.

- We use agency workers throughout the year as a standard part of our workforce to cope with peaks and troughs in workload.
- We work with an agency to recruit the workers who comply with the Gangmaster Licencing Act (2004) and the Association of Labour Providers.

OUR RISK ASSESSMENT OUTCOMES AND ACTIONS

We have not found any incidents of modern slavery to date.

Covid 19 saw us curtail all our overseas travel during the past year, but we have maintained close contact with our factories throughout. We have continued to conduct supplier audits in accordance with our on-boarding processes. and look forward to resuming our training and accreditations with suppliers in the forthcoming year, subject to any further developments in Covid infection rates and variants. To ensure we can track ongoing progress, we have a number of KPIs;

- Upholding a declaration of commitment from our suppliers
- Closely monitoring performance against our supply chain code of conduct, this is not only based on Health and Safety and a detailed look at documentation, but also extensive interviews with many workers in private
- Monitoring risk beyond our first-tier suppliers
- Tracking and reporting on the issues which highlight risks of, or are symptomatic of, modern slavery, and the remedial action taken
- Maintaining staff training levels, with a focus on those procuring product

OUR TRAINING AND CAPACITY BUILDING

We have an ongoing commitment to train our own people on modern slavery.

Communication is a regular feature of our 'Family Gathering' meetings at our head office in London and our distribution centre in Leicester. These meetings are in addition to our Brand Vision inductions for new starters and as part of our product team meetings.

We have a comprehensive system for listening to our employees, and these inputs have huge influence on the decisions we make. There are various mechanisms we use for listening and informing, including the ability for staff to feedback anonymous comments safely and in confidence.

We also support people and foster community spirit wherever possible. We donate 1% of our profits to charity and have created specific products where we donate the profits to our partner charities. We are proud to support Home-Start UK, a charity who help families with young children through their challenging times.

CURRENT FOCUSES

- We continue to review and update our supplier mapping to ensure we maintain transparency in our supply chain.
- We will continue to expand our second-tier accreditation programme, reaching more suppliers within our base.
- We are excited to begin a new accreditation programme with our third and fourth tier supply chain, to improve insight and transparency in these tiers.