

WHITE STUFF

MODERN SLAVERY STATEMENT

OCTOBER 2022

In accordance with section 54(1) of the UK Modern Slavery Act 2015, we set out below our sixth Modern Slavery Statement, for the financial year ended 1st May 2022.

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

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 year, we have sought to strengthen the expertise and resource to formalise and deliver our ESG ambitions by appointing external consultants who are global leaders in sustainability strategy, and by recruiting a dedicated in-house product sustainability expert to help drive our ESG work throughout our business. Understanding, identifying and gaining transparency throughout all our tiers is a vital step in modern slavery risk mitigation.

This statement outlines the work we have carried out in our full financial year ending 1st May 2022 and has been approved by the board of directors



Jo Jenkins – CEO, White Stuff Ltd
October 2022

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 2022 was £133.7 million.

We have:

- 117 shops in the United Kingdom
- 26 UK concessions
- 19 international concessions, 10 in Germany, 9 in Belgium
- 8 shops in Germany
- 468 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	Portugal	2
Cambodia	3	Tunisia	2
China	42	Turkey	12
India	40	United Kingdom	2
Italy	1	Vietnam	1
Nepal	1	Spain	1
Sri Lanka	3	Total	121

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 First Tier Strategic Suppliers in India are now involved in delivering Accreditation Programme training to their suppliers.	Second Tier mapping carried out for Accredited Suppliers in India and auditor training for Second Tier suppliers completed.	Third Tier mapping carried out for Accredited Suppliers in India and auditor training for Third Tier suppliers completed.	Started to map through our sustainable cotton Programme. Fourth Tier Suppliers audited by Third Tier suppliers as part of the Accredited Supplier programme.

The table above explains the tiers in our supply chain. Understanding, identifying and gaining transparency throughout all our tiers 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.

Driving Certified Responsible Materials usage at pace enables us to increase transparency of our lower tiers. Using more Responsible Materials year on year is a key focus of our product teams. We plan to drive transparency to raw material level and onto farm level to mitigate, particularly within agriculture, where poor working practices lead to a higher risk for modern slavery. We have made a commitment to use only sustainably sourced cotton in our products by 2024. We are aiming to use 100% certified materials by 2030.

To formalise our ESG ambitions, in 2022 we have engaged a consultancy, which is the largest group of sustainability experts globally, to bring detailed expertise to our business. We also employed an in-house Product Sustainability Implementation Expert to drive our ESG work throughout all of our teams.

Our GOTS certified cotton and Fairtrade cotton usage increased year on year. Driving certified cotton ensures we use world leading textiles standards covering organic, ecological and social criteria. Certified cotton models are independently verified, driving up social standards around cotton farming.

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 last year we have further increased our visibility of our Second Tier supply chain. We have begun the process of gaining visibility of our Third and Fourth Tier supply chain by starting a new Accreditation Training Programme with our key suppliers in India.

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

Our policies explicitly state that offences under the 'modern slavery' term are against the White Stuff ways of working. 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.

OUR POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

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.	Our programme in Turkey was paused in lockdown and has now been reinstated in 2022
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	High Risk Child Labour identified in Fourth Tier, primarily cotton farms during harvest; additional monitoring to be carried out by Third Tier Suppliers in the Accreditation Programme.
Informal Labour	Increased number of workers without contracts in Secondary Tier factories in India	Continuing our First Tier Accreditation Programme in India	Roll out our new training programme for Second Tier suppliers in India & Bangladesh
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 High risk sourcing geographies require risk assessment as part of the company's sourcing policy particularly in India, Cambodia, China, Turkey
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	Risk assessment methodology extended to auditor training programme for Second and Third Tier suppliers.

OUR OWN UK BUSINESS

We are aware that modern slavery risk is not confined to our manufacturing supply chain.

We have a rigorous monthly check on our own directly employed workforce to ensure that National Living Wage rules are respected, and we regularly review our internal procedures to ensure that this remains the case. Where we employ indirectly through agency workers (for example, at our Distribution Centre), we ensure that our partner agency fully complies with the Gangmaster Licensing 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 2021 but we maintained close contact with our factories throughout. Since early 2022 we have re-commenced our visits to our factories and have continued to conduct supplier audits in accordance with our on-boarding processes. We have also now resumed all our training and accreditations with suppliers

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

During 2021-2022

Second Tier and Third Tier Accreditation Programmes were completed for strategic suppliers in India:

- 28 auditors employed by Second and Third Tier suppliers completed the WS training programme
- Second and Third Tier Suppliers' Supply Chain was mapped
- Second and Third Tier Suppliers' Supply Chain map captured in WS ethical database and audit reports recorded
- Fourth Tier Suppliers audited including ginners and farms.

NEXT STEPS: 2022-2023

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 into Bangladesh and Turkey.

The programme can also now be extended into China and Cambodia, but we will need to focus on extensive training with our partners in region.

We will continue to monitor political unrest in Sri Lanka with the aim of introducing the programme in this area when the situation stabilises.

We are excited to have begun our new Accreditation Programme with our Third and Fourth Tier supply chain, to improve insight and transparency in these tiers.

Fabric mills, printers and dye houses are rapidly becoming our focus as we build transparency with these sources. We are looking to join the SAC Higg Index FEM Facility Environmental Tool to standardise measurements of our social and environmental impacts throughout our facilities. Gathering information with these sources to benchmark and continually improve our social standards is key to us achieving the highest ethical standards.