

WHITE STUFF

MODERN SLAVERY & HUMAN
TRAFFICKING STATEMENT 2023

INTRODUCTION

We are pleased to present our Modern Slavery Statement for the financial year ending 30th April 2023.

The report sets out how we identify, mitigate and monitor Modern Slavery, the activities we have undertaken to identify and prevent Modern Slavery from operating within our supply chain, and our goals for the next financial year.

White Stuff has always sought to do business in a responsible and transparent manner. We make beautiful clothes that are built to last and feel special enough to wear season after season. We have a sustainability strategy which is based on three pillars – Fabrics, Environment and Community. Our community includes those who work for us, in our shops, our head office and our distribution centre. It also means everyone involved in our supply chain, from the people growing or making the raw materials that go into our clothes to the factory workers around the world assembling components of our garments.

The fashion industry is at high risk of modern slavery and human trafficking abuse. The fragmented nature of the supply chain means that visibility over the end-to-end supply chain can be challenging. White Stuff and our suppliers work together as one team with a continued business commitment to maintaining good ethical practices. We are committed to ensuring labour rights are respected throughout our supply chain, to sourcing responsibly, and to prevent modern slavery and human trafficking, in line with the ETI base Code and the UN Guiding Principles.

Our Modern Slavery Statement covers the financial year ended 30th April 2023 and is made pursuant to section 54(1) of the Modern Slavery Act 2015. It was approved by the board on 1st September 2023.

ABOUT WHITE STUFF

White Stuff started life in 1985. Still privately owned by our ski loving founders, we opened our first shop in Battersea, South London – the first of over a hundred that we have today across the UK & Germany.

Our head office is based in Kennington Park, South London, where we create all of our uniquely designed product. Our central distribution centre and customer services team are based in Leicestershire.

We have 116 shops in the United Kingdom, 36 UK concessions, 17 international concessions (8 in Germany and 9 in Belgium), 8 shops in Germany, a UK and German website and 650 wholesale accounts covering the UK, Ireland, Europe, and North America.

White Stuff employs 1,215 people across the UK in our shops, our Leicester distribution centre and call centre, and our London head office. In addition, we employ 65 people in Germany, 16 in Belgium and 4 in Guernsey.

Our beautifully designed product is carefully crafted and manufactured in partnership with 48 suppliers covering 97 factories in total across 11 countries: Bangladesh, India, Cambodia, China, Nepal, Poland, Portugal, Spain, Turkey, Vietnam and the UK.



OUR SUPPLIER PROFILE

OVERVIEW

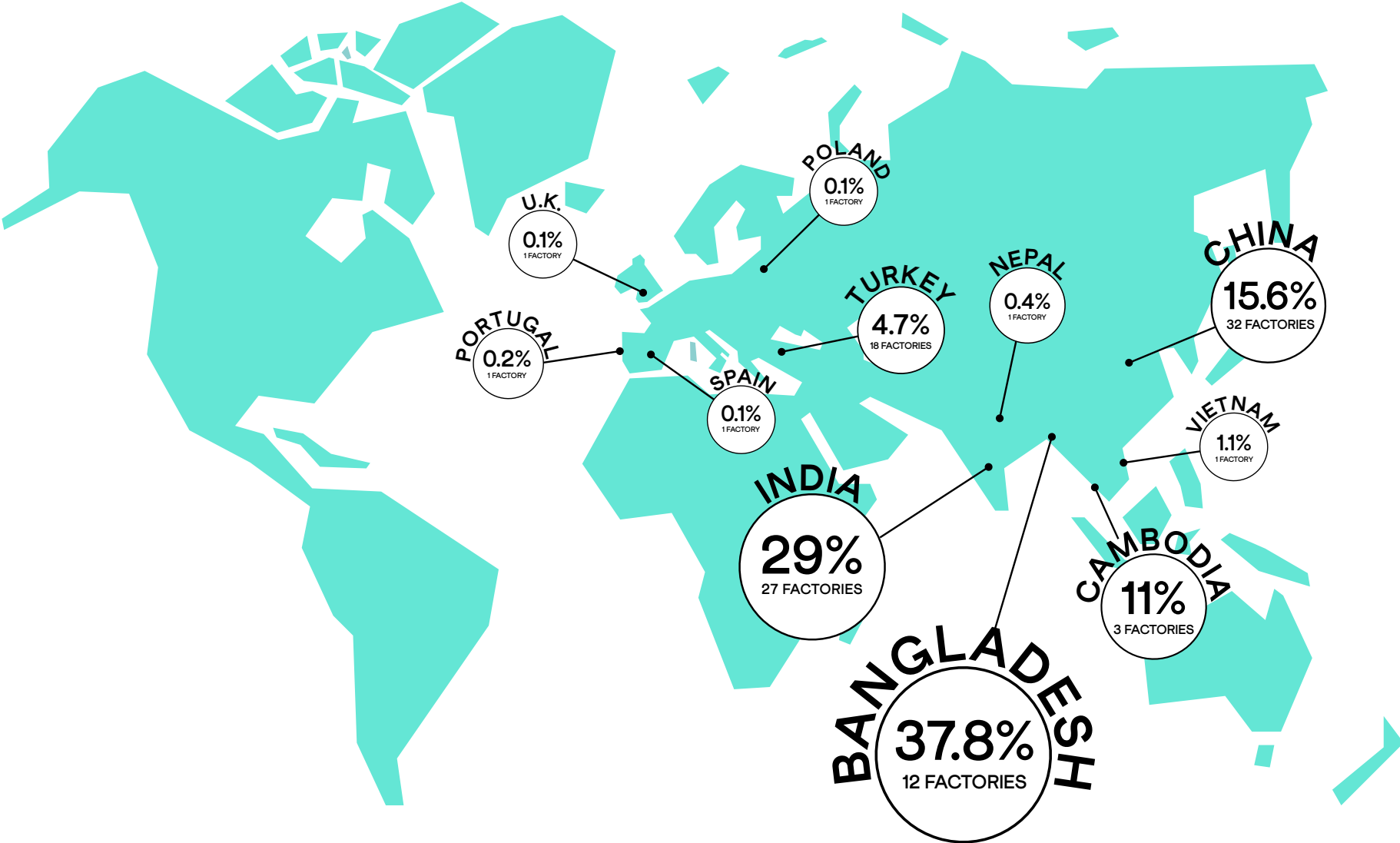
Our suppliers are chosen because of their impeccable manufacturing skills and good ethical credentials. We select our suppliers because they share the same obsession with quality, attention to detail and ethical values as us, and because they have a proven commitment to operate their factories and treat their workers in an ethical and transparent matter.

We pride ourselves on our collaborative relationships with our suppliers and aim to build long term partnerships. We have been working with nearly half of our stock suppliers for more than 10 years, and our top 5 suppliers now account for 50% of our business.

We review our sourcing strategy annually and share our reviews with our suppliers through a 'score card' system which gives our suppliers the opportunity to share their feedback with us and agree any changes to ensure strong working relationships are maintained.



At the date of this report, we source from the following countries:



FACTORY TIERS EXPLAINED

The garment industry is a fragmented one, with several layers of production levels (known as 'tiers') involved in the production of our final products.

We have mapped and audited 100% of our Tier 1 supplier base which you can find at whitestuff.com/supplierlist. We have mapped the tier 2 – 3 factories for all our key Indian suppliers, and are working to extend this visibility to additional jurisdictions, including Bangladesh in the following year.

TIER 4

The farms or factories that produce the raw material (such as cotton growers or manufacturers of synthetic fibres.)



TIER 3

The spinners & ginners who clean and spin the cotton



TIER 2

The fabric mills, printers, embellishers, tanneries and laundering units



TIER 1

The factories that we work with directly – tier 1 factories cut, make and sew our beautiful products

OUR POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

OUR ETHICAL CODE OF CONDUCT

Our supply base is risk assessed using the guidance from the United Nations Guiding Principles and by adopting Ethical Trade Initiative (ETI) internationally recognized Base Code of labour standards.

The ETI work with ground-breaking companies, trade unions and voluntary organisations to tackle the many complex questions of about what steps companies should take to trade ethically and make a positive difference to workers' lives. White Stuff has been a member of the Ethical Trading Initiative (ETI) since 2013.

Our Ethical Code of Conduct, which was updated in 2023, states:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Building & Fire Safety for all workers
- Child Labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular Employment is provided
- No harsh or inhumane treatment is allowed
- There are no bribery & corruption practises

Our code of conduct is supported by key standards, policies and processes which are issued to suppliers, and which, in addition to our Ethical Code of Conduct, include:

- Anti-Bribery, Corruption & Tax Evasion Policy
- Responsible Sourcing Policy

Above all, our primary goal is to have trust and transparency between our product teams and our suppliers so that we can identify and resolve any issues as efficiently as possible.

White Stuff does not work with some countries such as Jordan, Syria or Myanmar where illegal migrant labour has been identified as a high-risk. In addition, we do not accept cotton from regions with human rights concerns so strictly prohibit products containing cotton from Uzbekistan, Turkmenistan, Azerbaijan, Tajikistan & Xinjiang Region of China.

OUR SUPPLIER SELECTION PROCESS

We have strict on-boarding processes to screen and assess any new suppliers that we wish to work for, and only allow production to commence in new factories that have successfully completed this process.

We first check to ensure the supplier has an up to date, independent third party audit inspection report completed by an industry certified auditor, and there are no Critical or Major issues outstanding.

Suppliers are required to provide us with a checklist of information so we have a clear picture of the employee welfare and safety arrangements at an early stage of discussions, and we share with them our Ethical Code of Conduct and key policies. Finally, we also complete a financial check and – where we are sourcing sustainable materials – we obtain up to date scope certification.

If all the above stages are successfully completed, our suppliers sign our terms and condition of supply, which incorporates our supplier ethical policies. All new factories are awarded a certificate to welcome them to the White Stuff family.





OUR OWN UK & EUROPEAN EMPLOYEE OPERATIONS

Within our UK and European operations where we employ people directly, we adhere strictly to legislation in all aspects of employment law. We are an equal opportunities employer and have a variety of policies and procedures, both formal and informal, in respect of employee rights, which are made available on our employee intranet.

These include:

- Working Time Policy
- Employment Privacy Policy
- Child Safe-Guarding Policy
- Anti Bribery, Corruption & Tax Evasion Policy
- Whistle Blowing Policy
- Employee Privacy Policy
- Equal opportunities policies
- Harassment and bullying policy
- Health and Safety Policy

We run regular monthly payroll checks and undergo compliance self-checks to ensure that we do not inadvertently pay at rates below National Living Wage levels, and our processes are subject to annual external audit. All new employees must pass 'right to work checks', which amongst other things, also ensure they are of appropriate legal age to work, and have the right to work in the UK.

We also employ staff indirectly through temporary worker agencies (notably at our Distribution Centre to allow us to flex up at peak periods). We use labour from agencies that are in receipt of a verifiable gangmasters licence issued in accordance with the Gangmaster Licensing Act (2004).

TRAINING AND AWARENESS

OUR SUPPLIERS

White Stuff has its own Factory Accreditation Programme which is a key tool in ensuring that our strategic suppliers meet the high standards that we expect from our tier 1 factories, and that such standards are in turn cascaded to the next layer of tiers throughout their end-to-end supply chain. When a tier 1 factory reaches accredited status, we then train a number of individuals within the factory to deliver the accreditation training programme to their tier 2 - 4 factories, and to undertake audit reviews. We are pleased with the progress of this programme, which has initially focussed on our Indian strategic suppliers.

OUR EMPLOYEES

White Stuff employees are made aware of our commitment to ethical trading and Modern Slavery policies through periodic ESG updates which are 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.

Our employees and potential employees are made aware of our employment, grievance and equal opportunity policies through the recruitment process and all such policies are available on the employee intranet. We also run a comprehensive

system for listening to our employees, and the outcomes of these sessions are considered in our decision and policy making process. There are various mechanisms we use for listening and informing, including the ability for staff to feedback anonymous comments safely and in confidence. Finally, we have a Whistle-Blowing Policy where our employees can raise any matters of concern or suspicion in confidence.

We also support people and foster community spirit wherever possible. We donate 1% of our profits to charity and undertake a range of other fundraising activities, including a range of charity 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.

HOW WE IDENTIFY AND REPORT ON MODERN SLAVERY RISKS

GOVERNANCE FRAMEWORK

Our ESG committee, which includes representatives at the most senior level of the business, meets at least monthly, led by our Chief Executive Officer. The ESG committee has within its remit the assessment and mitigation of modern slavery risks. It reviews our approach to identifying Modern Slavery risk within the supply chain and assesses progress. Any significant concerns or material risks are highlighted to this committee who review and approve any proposed actions. The Board of Directors of White Stuff reviews and approves the Modern Slavery statement on an annual basis.

As members of the ETI we have annual member meetings on our progression which gives us tailored and independent support. These meetings also help guide us on how to develop and improve our business approach to addressing human rights issues in our supply chain.

FACTORY VISITS

Working closely with our partners is an essential way to review and assess working conditions, review audit expectations and generally build stronger relationships with the factory teams.

In the year under review, we were delighted to re-commence our ongoing programme of factory visits following a temporary suspension of visits during the Covid pandemic, and we as a UK team have visited all of our strategic factories in Bangladesh and India over the past year. As part of these visits, we

have worked collaboratively with our suppliers to ensure they are familiar with, supportive of, and can adopt all aspects of our supplier manual, including our ethical policies and procedures.

OUR AGENTS

In addition to our requirement for all factories to have an annual independent third party audit, we also commission our own independent audits in India, where the supply chain is particularly fragmented.

Our auditors visit our Indian factories and conduct additional audit reviews to provide a deeper level of insight and support to ensure we maintain a high degree of consistency and transparency within the region. This approach allows us to share with our suppliers our belief in the fair and equitable treatment of workers throughout the supply chain as stated in our Code, and then help them embrace those principles with conviction and belief, not just duty of care.

SUPPLIER AUDITS

White Stuff has robust processes to ensure that all Tier 1 factories are audited annually in line with the ETI base code. These audits are carried out by nominated independent third-party auditors. 100% of our tier 1 factories underwent an independent external audit during the year under review and we have found no instances of Modern Slavery to date.

Where non-compliance issues are identified, a rating is assigned (Critical, Serious, Minor) and a corrective action plan (CAP) which includes timescales for resolution is discussed and agreed with the supplier. A Corrective Action Plan Report (CAPR) is then issued to the supplier and factory management and is monitored by our ethical compliance manager who ensures issues are rectified in line with the agreed timeframe, working with the factory to support where needed. Any material areas of non-compliance or overdue remedy of significant issues identified are reported to the ESG committee.

In addition, we recognise that that audits are only the first phase of the ethical journey that we share with our suppliers; engaging and training their auditors is the second phase; Supporting supplier auditors as they check their supply base is the third; and reaching the final 4th Tier of the supply chain (raw materials) is the eventual final phase.





ASSESSING RISKS AND AREAS OF IMPROVEMENT

We continually monitor and assess risks to identify and mitigate modern slavery risks, and to address areas which may require improvement.

SUPPLY CHAIN TRANSPARENCY – GENERAL

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 - migrant labour is a global issue and there is a lack of access to support in some regions to educate workers on their rights. We keep informed with this through the ETI and collaboration with our supply base.

We have mapped and audited 100% of our tier 1 supplier base and are working hard to complete the mapping of our entire tier 2 supply base within the next 12 months.

This year we are introducing an enhanced and comprehensive database to monitor our supply chain audits, so that we have quicker, more insightful access to our factory audits and issue progress, and have clearer, up to date information on any issues raised during an audit, and their timely resolution. We will also improve the risk ratings of our global supply chain so that we can ensure our work is appropriately focused on higher risk areas.



SUPPLY CHAINS IN INDIA

Our Indian suppliers comprise 29% of our total supplier mix. We have identified this region as a higher risk area due to the fragmented nature of the end-to-end supply chain.

We have targeted the roll out of our Accredited Factory Programme to this region and have trained all our strategic Indian suppliers in the programme. In addition, for each strategic supplier trained, we have mapped all their tier 2 and tier 3 suppliers and trained 28 auditors in these tiers. We will continue to progress this work, and to roll out to new jurisdictions.



SUSTAINABLE MATERIALS ACCREDITATION

White Stuff has a strategic commitment to source more certified, sustainable materials year on year, and by the end of 2024, we expect 100% of our cotton to be from certified, sustainable sources.

Using fully traceable transaction certificates, such as those we obtain through our partnership with Global Organic Textile Standards (GOTS), is key to us being able to chase the chain of custody of our product. This gives us full visibility of the product life cycle and we can trace the origin of the cotton and verify the working conditions in our supply chain back to source.



FAIRTRADE STANDARDS

Our Partnership with Fairtrade allows us to independently verify that farmers are paid a fairer price for their cotton. It allows us traceability to the co-operatives from which we have sourced. We are absolutely delighted to say that we are now the largest UK fashion retailer of Fairtrade Sourced Cotton.

The Fairtrade Standards strictly prohibit forced and child labour [as defined by the International Labour Organization (ILO) minimum age and the worst forms of child labour conventions] and are committed to fighting the root causes of labour abuses. Buying Fairtrade Sourced Cotton means that cotton farmers can sell more of their cotton on Fairtrade terms and get a fairer deal.



OUR FUTURE COMMITMENTS

- We will extend our White Stuff Accreditation Programme and auditor training to new jurisdictions, with a particular focus on tier 2 – 4 factories for our key Bangladeshi suppliers. Completing this work will mean that 50% of our factories will have completed our accreditation programme and auditor training for tier 1 – 4 suppliers.
- We will build on our tier 2 mapping in India and extend this to all jurisdictions where our factories are present. We expect to complete the mapping of all tier 2 factories across our global supplier base within the next 12 months.
- We will continue to improve the transparency of our end-to-end supply chain through our ongoing strategy to increase our use of certified, sustainable materials.
- We are strengthening our ethical team – we have recruited a dedicated Sustainability Manager and are introducing a new role of Responsible Material Manager. Both roles will be fully involved in enhancing the sustainable and transparency credentials of our supplier base.