

WHITE STUFF

MODERN SLAVERY & HUMAN
TRAFFICKING STATEMENT 2024

A WORD FROM OUR CEO

We are pleased to present our Modern Slavery Statement for the financial year ending 27th April 2024.

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.

Over the last year we have continued to invest in our Responsible Sourcing programme which has provided an additional level of independent review and assessment of our supply chain practices. We have also invested in new platforms which has provided more granular, real-time reporting of our factory risk and compliance profile.

The fashion industry is at high risk of modern slavery and human trafficking abuse. The fragmented nature of the supply chain means that end-to-end visibility 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.

At White Stuff our policy is clear: everyone deserves to be treated with fairness, dignity and respect, whether in our business or in our supply chain. We are committed to working collaboratively with our suppliers and our stakeholders, learning from our experiences and continually developing and improving our programme where we know there may be risk.

In 2025, I look forward to supporting the development of this programme even further. We will continue to work closely with partners and stakeholders to deliver a best-practice programme which addresses risk and promotes freedom from exploitation for all those in our value chain.

Jo Jenkins, Chief Executive Officer



OVERVIEW

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

We have 114 shops in the United Kingdom, 45 UK concessions, 22 international concessions (12 in Germany and 10 in Belgium), 6 shops in Germany, a UK, German, rest of world, and US website and 650 wholesale accounts covering the UK, Ireland, Europe, North America and New Zealand.

White Stuff employs 1,190 people across the UK in our shops, our distribution centre and call centre, and our head office. In addition, we employ 65 people in Germany, 15 in Belgium and 3 in Guernsey.

Our beautifully designed product is carefully crafted and manufactured in partnership with 55 suppliers covering 103 factories in total across 11 countries: Bangladesh, India, Cambodia, China, Nepal, Poland, Portugal, Spain, Turkey, Vietnam and the UK.



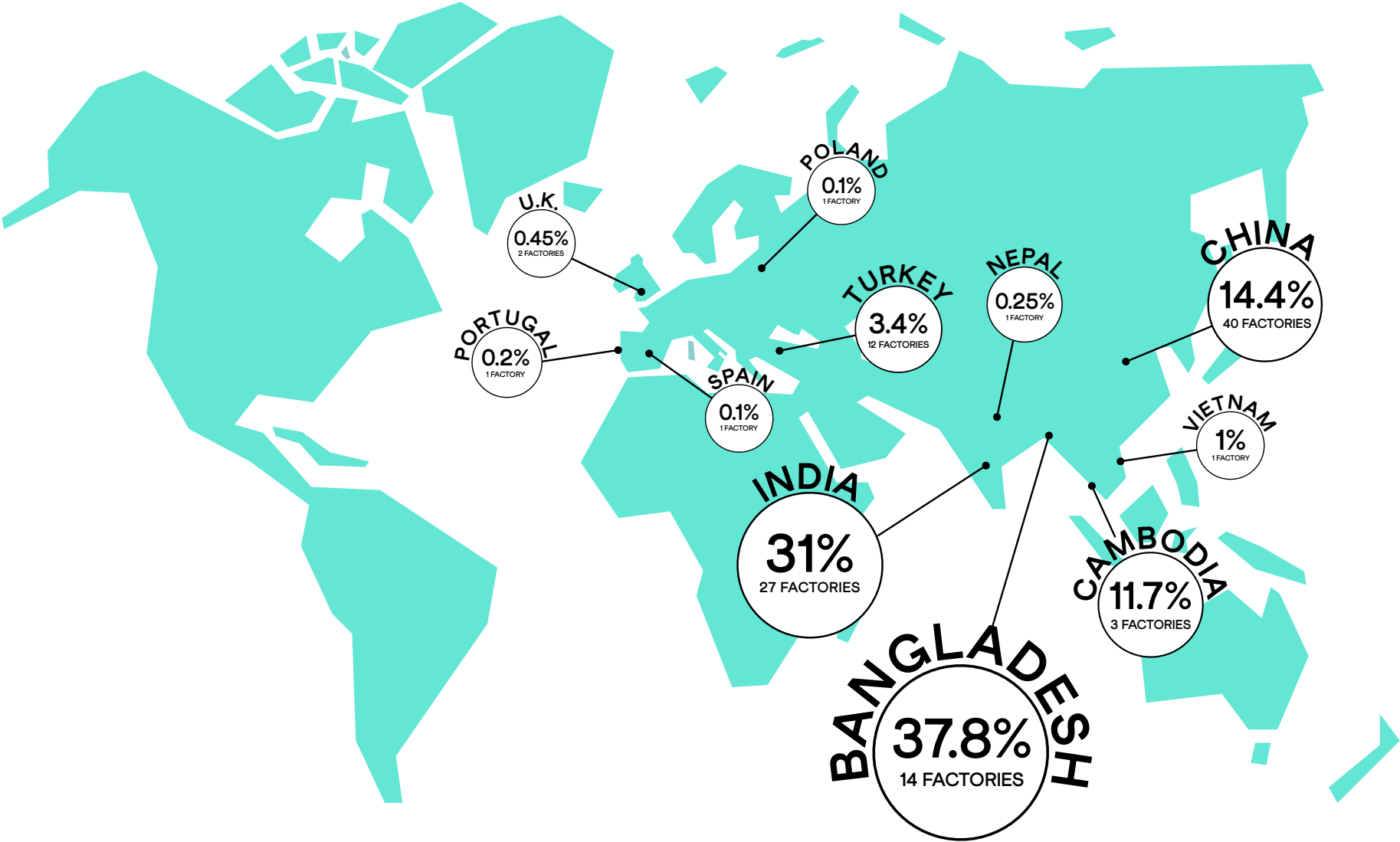


OUR SUPPLY CHAIN

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 account for over 50% of our business.

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



Please note this map illustrates percentage of production and number of factories in each country of operation.

SUPPLY CHAIN 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. White Stuff is committed to preventing any modern slavery across all our business operations.

We have mapped 100% of our Tier 1 supply chain which you can find on [whitestuff.com/supplierlist](https://www.whitestuff.com/supplierlist).

We have made excellent progress with the mapping of our Tier 2 factories, which covers our fabric and yarn mills, with 98% (323 factories) mapped at the time of writing.



TIER 4

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



TIER 3

The spinners & ginner 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

White Stuff and our suppliers work together to maintain 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 Ethical Trading Initiative Base Code, the UN Guiding Principles on Business and Human Rights, and the International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

This year we have updated our Ethical Code of Conduct and ensured its inclusion within our updated Supplier Manual which is issued to all suppliers, and which forms part of their contracted terms and conditions of supply.

Our Code of Conduct insists that:

- 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 practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed
- There are no bribery & corruption practices

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.

ETI MEMBERSHIP

We remain an active member of the Ethical Trading Initiative (ETI), a body made up of retailers, non-governmental organisations and unions. The ETI is a way for these organisations to come together and share learnings, join projects and work closely on supply chain initiatives that can bring changes and improvements for workers in the factories that make our product.

As members of the ETI we also 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.

BUYING POLICIES

Our buying policies prohibit us from working with countries where illegal migrant labour has been identified as a high-risk. This year we have also added countries where there is a very high risk of forced labour or lack of freedom of movement such as Afghanistan and Somalia. Our cotton policy builds on this focusing on sourcing concerns related directly to the product, stating that we do not accept cotton from regions with human rights concerns.

OUR SUPPLIER SELECTION PROCESS

Before we start work with a new factory, we obtain an independent audit of the factory to provide assurance that the factory provides a safe working environment and operates in accordance with our Code of Conduct. All suppliers, including all new suppliers, are required to have in place a valid, in date, recognised ethical audit submitted to our ethical compliance partners. These audits are assessed and independent third party audit inspection reports are completed by an industry certified auditor. We will not onboard any factory where Critical issues have been identified.

All new suppliers are issued with our Supplier Manual, which includes our Modern Slavery Policy and Code of Conduct, and which forms part of our supplier contractual terms and conditions.

OUR EMPLOYEES

We employ people both within the United Kingdom and in Europe and adhere strictly to all applicable employment legislation in these territories. 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). This means that all staff are paid the correct wages without unfair deductions, such as recruitment fees, and checks are conducted on their employment.



TRAINING AND AWARENESS

During the year we introduced a new, bespoke and mandatory Modern Slavery Training Programme for our departments with a higher interaction with our supply chain. These include our buying, design and technical teams. This training included content to help our teams understand the various forms which modern slavery can take, how to spot the signs and report concerns. We conducted MEL (Monitoring, Evaluation and Learning) on this session to ensure it was effective: on average our employees scored the training at 4.5/5 and their understanding on the topic increased from an average 3 stars to 4.5 stars.

We also conducted a White Stuff accreditation programme and auditor training with our 5 key strategic suppliers in Bangladesh, holding workshops and training over a five-day period on how to audit Tier 2, 3 and 4 factories.

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. All employees are required to undertake mandatory health and safety, data security and privacy training to ensure that they are aware of their responsibilities. 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 feed back 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.

Finally, we 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.



HOW WE IDENTIFY AND SUPPORT ON MODERN SLAVERY RISKS

Understanding, identifying and gaining transparency in our supply chain 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 as can the use of migrant labour. We work with the ETI and in collaboration with our supply base to ensure these risks are identified and addressed, and our policies preclude us from working in high-risk areas.

In the year under review, we have established and communicated internal reporting pathways to all team members actively engaged with suppliers, so that any staff members concerned about or suspicious of activities have clear reporting and escalations paths.

SUPPLIER AUDITS

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

All 100 of our Tier 1 factories are subject to an annual independent audit. Should any non-compliance issues arise, a CAP is put in place, to grade the issue, agree the corrective action and define a timescale by which the issue must be addressed. We engage closely with our external auditing partner to obtain regular updates on the progress of each supplier, to ensure agreed actions are resolved within appropriate and agreed timescales. Alongside the CAP, training is provided so that non-compliances are not only closed but practices are improved long term.

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 have visited all of our strategic factories across India & Bangladesh. 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 revised Supplier Manual, including our ethical policies and procedures.

We have also restructured our quality control team in India to strengthen the way we monitor and check processes around production, people and ways of working in these factories.

RESPONSIBLE MATERIALS

Our responsible materials strategy provides additional risk assessment and scrutiny throughout our supply chain. This year we have reached certified materials status on 70% of our total product lines as set out below.

Attribute	Certification Standard	% total units
Organic	Global Organic Textile Standard Organic Cotton Standard	32%
Fairtrade	Fairtrade Standard	19%
Sustainable Viscose	EcoVero Lenzing, Lyocell, Tencel, Birla Liva Eco and FSC.	8%
Recycled Fabric	Global Recycled Standard	6%
European Flax	European Flax™	4%
Responsible Wool	Responsible Wool Standard	1%
Total		70%

To achieve certification status suppliers must meet the mandatory requirements of the certification bodies and provide clear chain of custody documentation illustrating materials sourcing. A good example of how certification can directly impact human rights is from our organic cotton sourcing. One certification which we regularly use for organic cotton is GOTS (Global Organic Textiles Standard) and there is a substantial ethical assessment required in order for suppliers in all tiers to receive accreditation.

This factor alongside our supplier auditing programme helps to provide us confidence that suppliers at all levels of the chain operate within our Ethical Code of Conduct.





FAIRTRADE

We are pleased that we are the largest UK fashion retailer of Fairtrade Sourced Cotton. 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.

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

GOVERNANCE FRAMEWORKS

Our ESG committee, chaired by our Chief Executive Officer, includes representatives at the most senior level of the business and meets on a regular basis. 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. 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.

ASSESSING RISK AND AREAS FOR IMPROVEMENT

During the year we increased our capabilities to review, monitor and risk assess our supply base by factory and country risk. We now work with a third party to use an enhanced and comprehensive factory compliance database to monitor our supply chain audits, so that we have quicker, more insightful access to our factory audits, including real time updates of the status of agreed CAPs.

We plan to build on this transparency in the forthcoming year by introducing a programme of spot-checks in our Tier 1 factories to ensure appropriate working conditions and practices are in place

Over the next year we will extend our existing Tier 3 mapping work, with a focus on those which make our key componentry, such as buttons, zips, labels and packaging.

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. We plan to enhance our supplier scorecard system by refreshing the ESG portion of the scoring matrix. We want to ensure that human rights and ethical compliance remains at the heart of our product and best practice is followed throughout the procurement process.



OUR FUTURE COMMITMENTS

Over the forthcoming year, we plan to:

- Continue to grow our certified materials usage. This strategy supports White Stuff's holistic approach to ESG as it impacts all avenues including human rights risks.
- Increase the mapping of our key Tier 3 suppliers to improve transparency at this next level.
- Commence a programme of mandatory due diligence checks at Tier 1 in the form of random spot checks.
- Update our Supplier Scoring Cards to measure ESG risks more effectively. This will ensure that global best practice is maintained in terms of risk assessment and legislation compliance.
- Extend the roll out of our Modern Slavery Training Programme within our business.