

# White Stuff®

## MODERN SLAVERY STATEMENT

OCTOBER 2020

### OUR COMMITMENT

We acknowledge that there is a high risk that modern slavery exists in our supply chain and acknowledge that we must tackle this issue and take steps to mitigate these risks and in the long term eradicate modern slavery. We continue to publish our Modern Slavery statements in October each year to demonstrate transparency in our supply chain. 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

We are publishing this statement as the COVID-19 pandemic continues to bring challenges for us and our suppliers, however we are still committed to maintaining good ethical practices. As a brand we are continuing to support our supplier base and work together as one team with a continued business commitment. We continue to collaborate with our suppliers, other organisations, and specialists on the ground and through our sustainability programmes we have gained further transparency of our supply chain tiers from farmers to factory workers.

This statement outlines the work we have carried out in our full financial year ending 2nd May 2020 and has been approved by the board of directors.



Jo Jenkins – CEO, White Stuff Ltd  
October 2020

### 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 multi-channel fashion and lifestyle brand recognised as a leader in sociable retailing. 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 to end 2nd May 2020 was £134.7 million.

We have:

- 122 shops in the United Kingdom
- 26 UK concessions
- 10 international concessions
- 8 shops in Germany
- 9 Belgium Concessions
- 883 UK and Ireland wholesale & international wholesale accounts
- our websites ([whitestuff.com](http://whitestuff.com) & [whitestuff.de](http://whitestuff.de))

White Stuff employs 1,126 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 135 factories across 13 countries, see the table below.

## GEOGRAPHY OF OUR FIRST-TIER FACTORIES

Supplier Country	Number of factories	Supplier Country	Number of factories
Bangladesh	13	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
		<b>Total</b>	<b>135</b>

## OUR SUPPLY CHAIN DEFINITIONS AND LEVEL OF KNOWLEDGE AND VISIBILITY OF OUR OWN BRAND SUPPLY CHAIN

	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 Knitting Packing	Laundry Garment dye Hand embellishment Fabric Mills Fabric printers	Yarn processing Ginning Spinning Dyeing	Farmers Man-made fibre producer
Mapping Status	Full visibility. Working conditions checked regularly with improvements implemented.	Partial visibility. Working conditions starting to be checked and improvements being implemented.	Starting to map.	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.

## 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 Equal Opportunities policy
- the Whistle Blowing 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. We have our own 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, which is aligned with our Ethical Sourcing Code of Conduct
- Supply Chain Commitment Policy

Our directors have endorsed the 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 WHERE THERE IS SLAVERY AND HUMAN TRAFFICKING RISK, AND THE STEPS WE ARE TAKING

Our risk assessment outcomes and actions are shown in the table below

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 Visibility of cotton farms through our sustainably sourced cotton commitment	Continue first-tier accreditation programme in India Visit Fairtrade farms in India, open discussion on risks
Informal Labour	Increased number of workers without contracts in secondary tier factories in India	Continuing our first-tier accreditation programme in India	Share success of our Indian accreditation programme with suppliers in Turkey
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

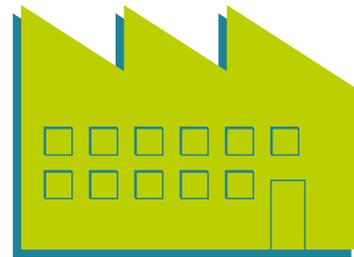
We recognise that risk is not limited to our global supply chain and modern slavery is very much present in the UK. We therefore take into consideration our DC in Leicester.

- 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 EFFECTIVENESS MEASURED AGAINST KPIS

**We have not found any incidents of modern slavery to date.** However, to ensure we progress, we set ourselves a set of KPIs and can report that in the past year, we have:

- Continued to track visibility of our supplier base across **18** manufacturing countries;
- Conducted **18** audits of our secondary tier suppliers including fully mapping our Fairtrade collection;
- Trained **12** suppliers' compliance team in White Stuff audit methodology including auditing yarn manufacturers;
- Improved working conditions for **2,050** workers in our secondary tier factories;
- Improved production planning practice with our supplier base, based on our Better Buying™ results;
- Detected no incidents of modern slavery.



## OUR TRAINING AND CAPACITY BUILDING

### Our own staff

**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 BrandVision inductions for new starters and as part of our product team meetings. We share information for our teams on our internal intranet, The Tea Room. We also have accessible information about our activities on our website: <https://www.whitestuff.com/doinggoodstuff/oursuppliers>

### Our Suppliers

**We have continued with our first-tier accreditation scheme which includes modules and workshops on modern slavery risks.** This year we awarded accreditation certificates to two of our key suppliers in India. Through partnering with SEWA (Self Employed Women's Association) we given training to 500 small-holder female cotton farmers.

Through our Better Buying™ membership, we have provided training for our product teams around good purchasing practices to ensure our actions do not have a negative effect on our suppliers and the workers in our supply chain.

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.

We have also visited our Fairtrade Farms and had discussions on human rights and raised awareness of the risks around modern slavery

# KEY ACTIONS COMPLETED

Our continued commitment to sourcing our cotton sustainably has allowed us to fully map our Fairtrade cotton collection. We know the location of our workers and we can check their working conditions.

We have delivered further training in our first-tier accreditation programme, upskilling our suppliers, and awarding two suppliers' certification for their continued commitment.

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.



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