

# White Stuff®

## MODERN SLAVERY STATEMENT

OCTOBER 2016

### INTRODUCTION

White Stuff believes that corporate social responsibility is core to our business practice. We create products that are made with integrity and finished to the highest standard, always working with good quality and ethical suppliers.

We're big on the little details and we strive to genuinely connect with those around us. Creating responsibly is a key foundation to our business, and as such we endeavour to source, produce and sell all of our products in this way.

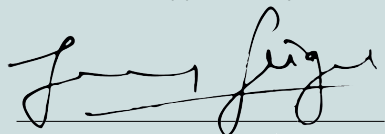
### OUR COMMITMENT

In 2015, the UK Government passed into law the Modern Slavery Act; we welcome this piece of legislation and recognise we have a responsibility to uphold our commitment to prevent modern slavery and human trafficking throughout our organisation and in our supply-chain. People are the most important asset we have and we must ensure they are treated in a way that fully respects their human rights. We will ensure that our policies and procedures are updated and that we have processes to enable our suppliers to learn from our values.

We will develop and deliver training, to ensure awareness and understanding of the requirements of the Act to the relevant people, including our procurement teams and the senior managers within our organisation.

Slavery is a complex issue and exists in many different forms. From adults forced to work against their will, to child labour and trafficked labour, we need to find effective methods to eradicate these practices from our supply chains and businesses, and are taking our first steps towards this, collating data by asking our suppliers specific questions about their own supply chains. Greater transparency will allow us to understand where the risks are and, in turn, enable us to make informed decisions so we can prioritise how we approach the issue.

This statement has been approved by the board of directors



Jeremy Seigal - CEO, White Stuff Ltd  
October 2016

### OUR BUSINESS

White Stuff employs 1900 people, 1500 in the UK across 140 Shops & Concessions; 300 employees within our Head Office and distribution centre based in London & Leicester; and 100 employed within International shops in continental Europe. Our product supply base is manufactured across 16 countries consisting of 90 product suppliers.

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### OUR SUPPLY CHAIN

White Stuff clothing and products are currently made in 16 countries across the world. 80% of our products are manufactured in China, India, Turkey and Portugal across 120 factories. These are the factories that supply us directly, otherwise known as 'first tier'. However, the supply chain is more complex than this, with many materials suppliers and process sub-contractors feeding into this 'first tier'.

We regularly check our first tier factories by carrying out ethical audits at their premises. To do this we have specially trained White Stuff auditors who check our global supply base. If issues are found during an audit we work with our suppliers to help them resolve the matter in a timely manner.

All suppliers and factories are required to demonstrate compliance to our code of conduct. New suppliers undergo initial screening and ethical audits as part of our supplier on-boarding process. We review our suppliers performance each season in a process that not only looks at their commercial performance, but also their ethical compliance. The feedback and results are then shared with our suppliers. We are members of the Ethical Trading Initiative (ETI) and we follow their base code. We have turned their base code into our own pictorial [White Stuff Code of Conduct](#). This code is translated into the local language and posted inside each factory. To check their understanding of the code our auditors will interview workers during the audit process. It is through these conversations that we believe we get a credible insight into the working conditions within each factory.

Being a member of the ETI gives us the opportunity to collaborate and work together with not only other brands, but additionally NGO's and Trade Unions, where possible.

### OUR POLICIES

Our internal policies are designed to educate and empower people to demonstrate our values. Our own business policies relating to modern slavery are: the Anti Bribery and Corruption policy; Equal Opportunities policy; Whistle Blowing policy; and Ethical Sourcing Code of Conduct. Our policies are designed to help our people consistently live our values and encourage them to report any disconcerting activity. We have a Corporate Social Responsibility (CSR) committee that champion this and they continue to explore where we can introduce new policies and update existing policies. For example, to include our commitment to educate our people and our supply chain about the modern slavery act and our responsibility.

Our Ethical Sourcing Code of Conduct includes prohibiting forced labour and child labour, and, as such, we have revised our auditors' manual to include extra checks in relation to slavery and human trafficking. In addition, each auditor has received extra training to ensure they understand their role in detecting issues.

As many issues can be hidden and difficult to uncover, we always look for ways to improve practices and increase effectiveness. We will, as necessary, further develop and implement effective auditing processes and reporting systems, and develop effective remediation programmes with respect to solving grievances where we find them.





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## DUE DILIGENCE AND RISK ASSESSMENT

As part of our due diligence process, in relation to slavery and trafficking for our non-product suppliers, we are using a questionnaire to conduct a risk assessment that asks suppliers a series of specific questions to gather data. We will then conduct a review of all questionnaire responses by rating them high, medium or low risk and work with each non-product supplier individually to ensure compliance with our values & code of conduct.

Due to the complexities and intricacies of our product supply chain, we are delving deeper and carrying out an assessment of our supply chain risk. All of our suppliers have been given a detailed introduction to the Modern Slavery Act and its importance. Focusing on our largest first tier clothing suppliers, we are researching the extent of their second tier supply chain, which will enable us to map the results. Progress will be measured using a set of key performance indicators (KPI's) including: number of suppliers engaged; number of supplier responses received; number of second tier suppliers mapped; number of suppliers audited; number of auditors trained; number of product team trained; number of senior managers trained. The information generated will then be analysed and a report drawn up outlining our findings.

## KEY ACTIONS COMPLETED TO DATE:



We have updated our  
**AUDITORS  
MANUAL**

with reference to the Modern Slavery Act and detailed what actions the auditors can take to ensure they are being effective when looking for issues linked to modern slavery.



We have provided  
**AWARENESS  
TRAINING**

to our largest suppliers, internal product teams and senior managers about the act and its requirements. Our Ethical Auditors have been trained regarding the extra steps they can take to uncover modern slavery.



We held an  
**INTERACTIVE  
CONFERENCE**

in India, which was attended by participants representing 60% of our suppliers. We introduced the modern slavery act and explored further down through the tiers in the supply chain.