

White Stuff®

MODERN SLAVERY STATEMENT

OCTOBER 2017



INTRODUCTION

At White Stuff we continue to create products that are made with integrity and finished to the highest standard. We choose good quality and ethical suppliers to work with and this is reflected in our goods. Creating responsibly is a key foundation to our business. This means that we endeavour to source, produce and sell all of our products in this way.

OUR COMMITMENT

We published our first [Modern Slavery statement](#) in October 2016. We welcomed the legislation because we recognise our responsibility towards people working in our own business and in our supply chain. Our Create Responsibly Strategy continues to be one of the five pillars of our brand vision. We promote the welfare and wellbeing of our communities, locally and globally, by creating connections and creating products responsibly. Delivering this aim is our dedicated Ethical Sourcing team who are committed to sourcing products in a way that improves the wellbeing of the people in our supply chain. This year, we have taken steps to educate key stakeholders about the risks of slavery, in partnership with NGOs and other brands that are members of Ethical Trading Initiative. Our policies are continually reviewed to make sure that they are relevant. We have taken steps towards checking the conditions of workers further down the supply chain, using a risk based approach to assess where our priorities need to be. After mapping the factories in the second and third tiers of our clothing suppliers, we undertook a pilot audit programme in India in February 2017 for our second tier suppliers. We have also developed more in depth training for our Turkish suppliers.

This statement has been approved by the board of directors.



Jeremy Seigal - CEO, White Stuff Ltd
October 2017

OUR BUSINESS

White Stuff employs 2000 people: 1500 in the UK across 160 Shops & Concessions; 350 employees within our Head Offices based in London & Leicester; and 120 employed within International shops in continental Europe. We have 120 product suppliers and 400 non-product suppliers, including recruitment agencies, logistics and shop fitting services.

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OUR SUPPLY CHAIN

[Our suppliers](#) currently manufacture in sixteen countries across the world in 160 factories. 80% of our clothing and products are made in four main countries: China; India; Turkey and Portugal. The workers who work in these 'first tier' factories produce and package the finished product. Each factory has been ethically audited to check the working conditions by our own specially trained auditors. By working closely with our suppliers to resolve issues we are proud that we have improved the working conditions for 60,000 workers in these factories over the year.

Clothing supply chains are complex, and ours is no different. Workers in the 'second tier' contribute significantly to the manufacture of our clothing and products. They spin and weave or knit the yarn, then finish, dye and print our fabrics. This year we have made progress to map the extent of our second and third tier factories by asking our 'first tier' suppliers to provide details of their supply chains. They were happy to help and we now have a significant amount of information about these factories. As well as mapping our second tier, we ask suppliers in the first tier to ensure our [Code of Conduct](#) is signed up to by factories in their supply chain, as part of our work as members of the Ethical Trading Initiative.

OUR POLICIES

Our internal policies are designed to educate and enable people to put our values into practice. Our own business policies relating to modern slavery provide a framework and process to support and protect our colleagues, suppliers and customers. These include:

THE ANTI BRIBERY AND CORRUPTION POLICY
THE EQUAL OPPORTUNITIES POLICY
THE WHISTLE BLOWING POLICY
THE ETHICAL SOURCING CODE OF CONDUCT

Our policies are designed to help our people consistently live our values and encourage them to report any issues of concern. We have a Corporate Social Responsibility (CSR) committee who champion this. The committee make sure that our existing policies remain both relevant and useful, for example to include our commitment to educate our people and our supply chain about the modern slavery act and our responsibilities.

Our ethical sourcing policies have had a positive impact on the workers in our supply chain. We resolved over 1200 issues, from labour and wage problems to health and safety, found during ethical audits within our first tier factories throughout the year. The effectiveness of our policies means that we resolve issues in a shorter amount of time; issues are now resolved in an average of 10 weeks rather than 18 weeks that it took last year. Resolving our issues quicker meant that we had the time to carry out a second tier pilot programme.

We continue to work closely with our team of in-country auditors to develop new ways of detecting issues, such as modern slavery. We have adopted a new auditing approach in Turkey where we do unannounced audits because of the high numbers of refugees in the country, many seeking work in the textile supply chain. As a responsible company, we want to ensure all workers are being treated fairly and not being discriminated against or employed against their will, in line with our Code of Conduct.

We are committed to train our own people and we completed this in a number of different ways. We trained 450 White Stuff employees about the Modern Slavery Act and the possibility that modern slavery may be present in our business and supply chains. We explained how we are and will be checking working conditions to ensure there are processes to detect and remedy modern slavery. Communication is now a regular feature of our 'Family Gathering' meetings at our HQ in London and our DC in Leicester; in addition to our Brand Vision inductions for new starters and as part of our product team meetings. We share information for all our teams on our internal intranet, The Tea Room. We have also improved access to information on our activities on our website, making it easier for our customers to navigate:

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DUE DILIGENCE AND RISK ASSESSMENT

We have engaged with each of our first tier suppliers to educate them on the Modern Slavery legislation. We are aware that there are many workers who contribute to the manufacture of our clothing and products further down the supply chain and this is why we have started to take a look at the conditions in some of the lower tier factories.

We carried out a risk assessment across our first tier supplier base to help us choose which second tier factories to focus on. Our clothing suppliers make up our largest proportion of product purchase at over 90%. We asked them to disclose the names and addresses of their suppliers who contribute to the manufacturing of our clothing so we could map and assess the highest risk. With a 75% response rate, we were able to look at the information supplied and compare that with political, social and human rights risks. As a result, we concluded that we should conduct a pilot programme in India and further training for our suppliers based in Turkey.

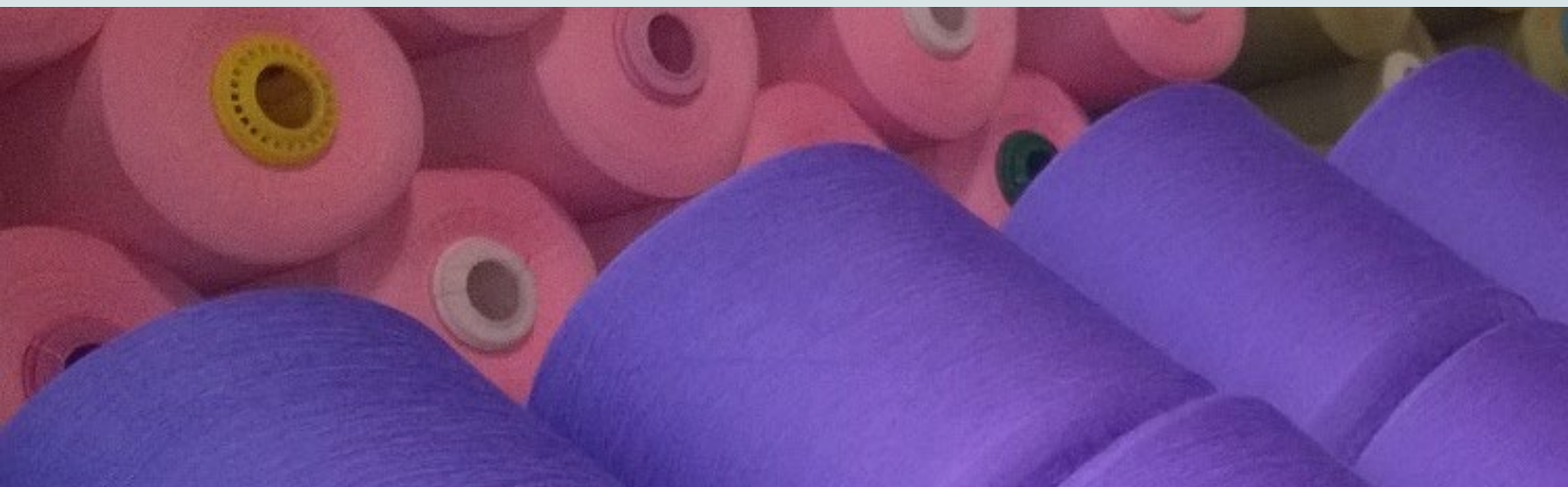
During the pilot programme, we were granted access to visit and audit five second tier factories who supply our first tier clothing suppliers in India, accompanied by their ethical compliance managers so we could tackle the issues together. There were many learnings from this pilot programme that we will build upon going forward.

Here are three key outcomes:

- 1. In general fabric mills, printers and dyers are much larger factories and geographically further far apart from those which cut and sew, making the workers more difficult to access.**
- 2. It is important that our auditor in India has an understanding of the different processes in these factories. She now has an understanding of the possible non-compliances to look out for.**
- 3. There are many chemical processes in the manufacture of textiles and we were able to share practical advice directly with the workers on the importance of safely handling chemicals.**

In January 2017 we held a workshop for our Turkish suppliers at our London Head Office. We discussed the situation and risks associated with the growing migrant population in their country. We invited Anti-Slavery International to present an interactive session where the risks were highlighted and ways to mitigate were discussed. At the workshop, we announced a change to our audit programme from announced to unannounced audits. Each supplier showed support for this and felt confident that their respective factories had in place effective policies and procedures. We successfully carried out these audits and timed them in line with production peaks. Our auditors were able to validate that these first tier factories are those that manufacture our clothing. Satisfied with the results of these audits, we will be sharing the results of our second tier pilot programme with them and encouraging them to check conditions of workers at their direct suppliers with the assistance of our audit team.

During the year, we have contacted our non-product suppliers to raise awareness and ask specific questions relating to their compliance with the Modern Slavery Act. We have received over 50% responses and half of those that replied are required to comply with the Act, having a turnover in excess of £36 million. We are in the process of collating their statements and sending out reminders to the non-responders. Where a non-product supplier has a lower turnover, we are asking them to sign up to our Code of Conduct.



KEY ACTIONS COMPLETED TO DATE:



WE ENGAGED WITH
**ANTI-SLAVERY
INTERNATIONAL**

to hold an awareness training workshop at our UK head office for our Turkish clothing suppliers. White Stuff auditors subsequently carried out unannounced audits at their first tier factories, with no instances of modern slavery found.



WE NOW HAVE A
**SUPPLY
CHAIN MAP**

of our first, second and third tier suppliers' factories, which has enabled us to carry out a risk assessment exercise.



WE CARRIED OUT A
**SECOND
TIER PILOT**

in India with two of our clothing suppliers auditing five textile factories checking the working conditions of over 5000 workers. Our auditor is now trained to recognise risks in second tier factories.

