

THE WHITE COMPANY  
LONDON

## MODERN SLAVERY ACT STATEMENT 2023

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August 2022 to July 2023

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## Our commitment

We take great pride in how we make our products at The White Company – not just that they are beautifully made, but that the same amount of care has been taken to ensure that we support the skilled craftspeople who make them. Many people are involved in our supply chain – in our offices, at our supplier’s factories and in our stores. We have a responsibility to ensure safe, healthy and equitable working conditions for every single one of them and are committed to working responsibly in partnership with our suppliers.

We have a zero-tolerance approach to Modern Slavery. As part of our continued Corporate Social Responsibility commitment, we are pleased to share our third modern slavery statement which covers the financial year ending 31st July 2023. Our statement outlines the journey, steps and measures that The White Company has taken to prevent human trafficking and Modern Slavery from taking place within our business and supply chains. As part of our continued Corporate Social Responsibility commitment, we fully support the transparency in supply chains provision (Section 54) of the UK Modern Slavery Act. Our statement also includes our commitment to the California Transparency in Supply Chains Act SB657 and the Australian Modern Slavery Federal Act 2018.

Supply chain transparency is a complex and diverse issue, but we believe that honesty and transparency are at the forefront of how we will improve our supply chain. This report is a snapshot of our progress and what we have implemented as our journey evolves and we push forward to be even better.

We understand our industry’s impact on people and the planet and are committed to the highest standards of ethical conduct and integrity in our business activities. We remain committed to driving continuous improvements as we acknowledge this is a long and continuous journey. We want our customers to be confident in our brand.

Mary Homer, on behalf of the Board of Directors  
CEO, The White Company  
January 2024



## Our story

The White Company is a British brand founded by Chrissie Rucker in 1994. Originating as a small mail-order brochure selling a range of white essentials for the linen cupboard, it has gradually grown into the ultimate luxury lifestyle destination for your home, wardrobe and little ones. It is now a multi-channel global brand, with our product sold in over 60 stores in the UK, concessions within luxury department stores, a franchise in the UAE and through our dedicated website both in the UK and the USA.

Chrissie is actively involved in leading the company and 50% of the Board of Directors are women.

Our head office is based in London, and we employ circa 1400 staff across our offices and stores.

## Mindfully sourced

We work with the highest-quality suppliers who share our values of accountability, transparency and sustainability. We carefully consider the suppliers we work with and the choice of materials we use. We have no ownership interests in our production chain but work with carefully chosen suppliers to develop our designs. We collaborate with industry organisations and NGOs to ensure that our products are manufactured in a socially ethical way, and we extend these principles to our own business operations. Our long-standing strategic supplier relationships, many of whom have been with us from the beginning, are based on trust, transparency and shared values.

85% of products designed by The White Company come from five key countries, and the breakdown of sourcing countries by spend is as follows:

China (33%), UK (23%), Turkey (14%), Portugal (10%), Vietnam (10%).

We also source more artisan or specialist product from other countries, such as Denmark, Spain and Indonesia. In total, we work with 305 approved factories (Tier 1) worldwide.



## What is Modern Slavery?

Modern Slavery is an overarching term for a complex, evolving and often hidden type of employment that encompasses forced and compulsory labour, and human trafficking. It exists in both developing and developed countries, including the UK, and can involve UK citizens as well as foreign nationals.

- Human trafficking – the process of bringing a person into a situation of exploitation.
- Forced and compulsory labour – all work or service which is not voluntary and is exacted under the menace of a penalty.
- Bonded labour – when workers borrow money to pay fees to recruiters or labour brokers to get their job and then must spend most of their wages to pay off that debt. Workers are unable to quit despite unfair or illegal conditions because of their debts.
- Slavery – a situation where a person exercises (perceived) power of ownership over another person.



## Responsible sourcing at The White Company

We have a dedicated Ethics & Sustainability team in our London head office which expanded this year to three people, now including a Head of Ethics & Sustainability, a Manager and an Admin Assistant. Since 2012, we have been members of the Ethical Trading Initiative. The White Company's Code of Conduct policy is based on the ETI Base Code, which ensures that:

1. **Employment is freely chosen**
2. **Freedom of association and the right to collective bargaining are respected**
3. **Working conditions are safe and hygienic**
4. **Child labour is forbidden**
5. **Living wages are paid – to enable a standard of living that allows food, housing, education and healthcare**
6. **Working hours are not excessive**
7. **No discrimination is practised**
8. **Regular employment is provided**
9. **No harsh or inhumane treatment is allowed**

All supplier partners must adhere to our Code of Conduct, which details our expectations to ensure safe and fair working environments and practices within our supply chain. We set the highest standards and work collaboratively with each supplier to increase our understanding and find solutions together. We update our Code of Conduct annually, setting even more stringent measures on our journey to continuous improvement. In 2018, we began benchmarking our risk assessment approach using the ETI's Human Rights Due Diligence Framework to identify opportunities for improvement. Our due diligence approach involves risk-assessment, supply chain mapping, monitoring, engaging workers directly, training and collaboration.

Our suppliers voluntarily participate in independent, third-party social audits to ensure fair, safe and healthy working conditions and continuous improvement. We expect all of the factories manufacturing our product to carry out an annual third-party social audit which assesses each factory against the ETI Base Code. A social audit (SMETA or BSCI) will include a physical tour of the factory and interviews with management, groups of workers and individual workers. These interviews are verified against each other as well as against attendance, wage and health and safety records. These audits are the core mechanism to ensure suppliers comply with our requirements, combined with supplier engagement. We work with the factories to make corrections where necessary.

Using these audits as well as the ETI Human Rights Due Diligence Framework, we assess whether there are any risks to workers' rights within our supply chain. Additionally, we use industry country annual reports on workers' rights and human trafficking, for example the current Trafficking in Persons report and ITUC Global Rights Index. We continue to work closely with the ETI, other members and industry peers to make improvements across our global supply chain.

## Transparency within our supply chain

Traceability is about knowing where our product comes from – understanding ‘who made our product’ at every level of our supply chain. It is vital that we have transparency within our factories if we are to assess and combat risks of Modern Slavery.

As part of our commitment to gain full traceability of our supply chain down to Tier 4, this year we have partnered with a supply chain mapping portal called Supply Shift.

Supply Shift allows us to map our tiers from raw materials (Tier 4) to the final manufacturer (Tier 1). Via a bespoke self assessment sent to our Tier 1 factories, we have mapped our manufacturers on the portal. Using the data collected from these sites (below), we are able to risk assess our supply chain, both environmentally and socially.

STRATEGIC AREA	INCLUDES BUT NOT LIMITED TO
Factory Profile	Name and address Main contacts for ESG Product area
Factory Governance	Ownership diversity data Codes of conduct Grievance mechanisms
Factory Social Governance	Audits and ETI compliance Worker voice and grievance mechanisms Workforce breakdown and disaggregated data, inc. gender and migrant policies
Environmental Governance	Policies Strategy and targets GHG, water and waste energy data

This year we rolled out the mapping and assessment to our top 20 suppliers across all product areas, which covers more than 85% of our supply base. Using the data received, we can gather data on our high-risk areas in terms of Modern Slavery.

## Modern Slavery risk areas

We already know that ‘workers most vulnerable’ to Modern Slavery in our supply chain tend to be informal workers, such as agency workers, subcontractors and home workers, as well as migrants (both local and international). We are also aware that some industries and geographies have higher risk levels, such as cotton and China.

Using Supply Shift, we have mapped our Tier 1 factories that manufacture all our product (main production site). In several countries it is common for suppliers to outsource parts of production to other suppliers or units that specialise in certain skills. This can pose a risk. We insist that all suppliers declare outsourcing to us, and we have identified 33 outsourcing units for primary parts of the production process, e.g. sewing or assembly.

Country	Number of Tier 1 Subcontractors
China	3
India	10
Indonesia	3
Italy	2
Portugal	4
Spain	2
Turkey	4
Vietnam	5

Alongside this, we recognise the importance and unique skills of home workers, and have mapped major sources of home working. We have identified 34 home-worker agents using an approximate pool of 1200 home workers. All of these sites have completed our Home Worker Assessments, which are updated annually.





Country	Number of Home-Worker Groups	Approx. Pool of Home Workers
Vietnam	21	1120
India	4	40
Indonesia	9	48

For more information on our position on home working and Code of Conduct, please visit [here](#).

Another aspect of supply chain mapping is identifying migrants, both local and international, in the workforce.

Migrant workers can be easily exploited as they can have less knowledge of their basic rights and are vulnerable to unethical employment practices, including Modern Slavery.

We have identified the migrant risk in our top four countries as follows:

Country	Number of Migrants	Local/International
China	8259 ↑	Local
Portugal	257 ↑	International
UK	472 ↓	International
Turkey	36	International

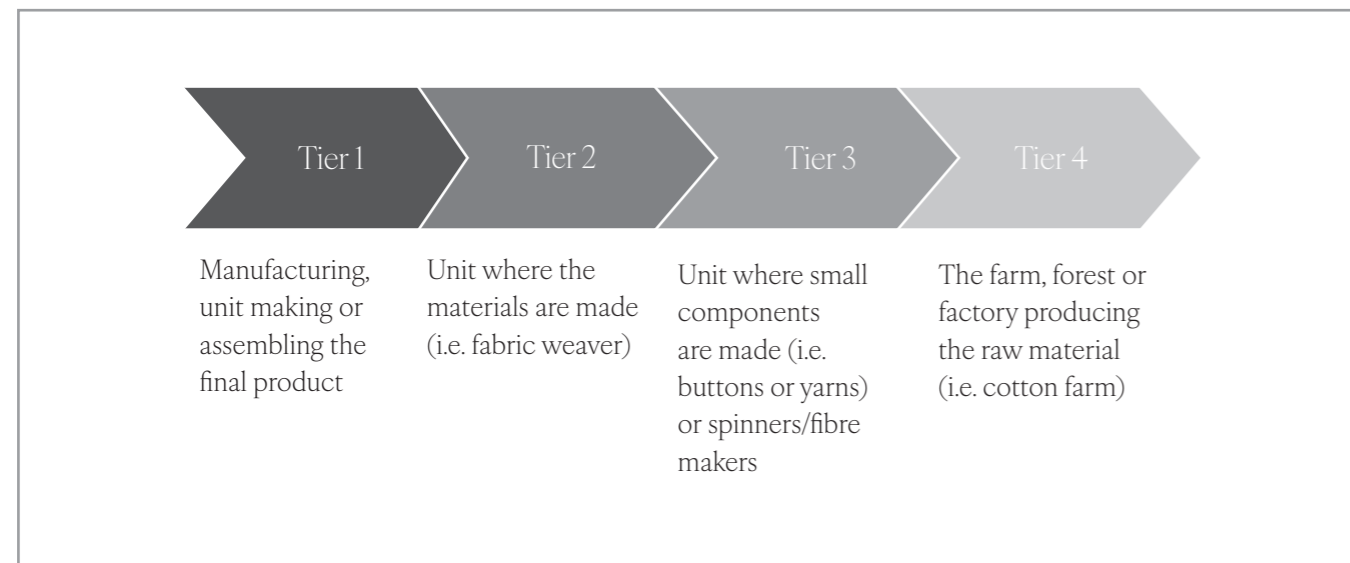
This year, the number of migrant workers has continued to increase in Portugal. This is mainly from factories in the south where there is more foreign labour. There has also been a big increase in Ukrainian workers in our EU factories compared to last year. There has been a continued decrease in migrant labour in the UK due to Brexit and foreign workers returning home.

## What next?

Our goal is to focus on transparency throughout our whole supply chain. This includes identifying the most vulnerable and high-risk workers, and working in partnership with our suppliers to gain more visibility of our supply chain.

In Year 2 of Supply Shift, we are going to roll out the self-assessment questionnaire to our Tier 2 sites, via the mapped Tier 1 sites. This will give us visibility of all factories making the key materials for our products. This will include fabrics, fragrance houses, knitwear yarns, wood processors and tanneries, among others.

## Supply chain tiers



We are aiming for full supply chain traceability.

We will delve further into informal and migrant labour by visiting sites and delving into recruitment practices and working conditions to evaluate the level of risk.

In addition, we are launching an internal training programme for our employees, covering a range of ethics and sustainability topics, including Modern Slavery training for all employees.



## Collaboration and working with others

As part of our commitment to a more ethical supply chain, we understand that organisations cannot achieve their goals alone. Only by working with like-minded others can we achieve greater scale, innovation, reform and impact. As well as being members of the Ethical Trading Initiative, we work in partnership with an anti-slavery consultant, who provides critical guidance and training. We collaborate with our peer retailers and competitors in regular industry meetings where we share knowledge and experience on supply-chain overlaps. This is so that we can collectively move forward as an industry and find solutions to shared challenges.

## Snapshot of implemented actions and ongoing work

### Ukraine & the EU

In February 2022, Russia invaded Ukraine, displacing over seven million people into the EU, predominantly women and children. Under the EU Temporary Protection Directive, displaced Ukrainians are eligible to benefit from employment, housing, healthcare and education.

Displacement of people through conflict puts them in a vulnerable situation and opens them up to dangerous situations, including human trafficking, slavery and exploitation.

As ETI members, we worked with them and a peer membership group and collaborated with the IOM United Nations Migration to develop guidance to support displaced Ukrainians throughout the EU. Various working groups were formed to address the key issues. These included the Ukraine Internal group, the Labour Movement group and the Russia Sanctions group. As we do not work with factories in Ukraine or have stores in Russia, we only participated in the Labour Movement group.

In 2022 we worked with 33 sites in the EU. We now work with 46 factories, including neighbouring countries to Ukraine, Poland and Slovakia. Initially, we identified these as the priority countries displaced Ukrainians were migrating to, and set up calls with those four factories as an initial touchpoint to discuss their current situation and to understand what they needed from us to support Ukrainian workers.

Following this, we expanded our scope and sent out a survey to all factories in the EU, along with guidance for supporting Ukrainian workers in various languages and the ETI Guidance for Employment and Integration of People Displaced from Ukraine. The survey covered the following areas:

- Recruitment practices
- Language requirements
- Documentation and wages
- Accommodation and transport
- Integration and wellbeing

Our initial survey identified six factories employing Ukrainians under the EU Temporary Protection Directive in Slovakia, Portugal, Poland and Estonia. Today, we still have six sites employing Ukrainians, but with an increase to 78 workers from 31 last year. This is an increase of more than double in under a year.







## India

As part of our ongoing mapping and transparency process, we discovered three factories in Northern India that employed informal subcontractors and home workers in Moradabad. This is usual practice in the Indian hard goods sector due to specialist skills that exist only in these villages. These workers are considered vulnerable as there is no visibility to their wages, working hours or general health and safety. We partnered with our supplier and Traidcraft to develop a training and capacity-building project designed to deliver positive outcomes for workers in the hard good supply chains in this region. Here's what we achieved:

- Improved working conditions, such as access to clean water, fire-fighting equipment and sanitation
- Improved occupational health by suggesting better working practices within subcontractor units and home-working units
- Introduced wage diaries for workers to monitor correct wage payments and work hours, reducing risk of pay disputes
- Raised awareness of entitlements and social entitlement schemes, such as artisan cards

Between 2018 and 2020, the project activities benefitted 93 subcontractors and home workers in this informal supply chain. Due to the success of the project, we are currently reviewing an extension to the project at current units as well as expanding out to further workers in our supply chain. We continued to monitor the programme in 2022 and 2023.

## China

We are aware (via media and civil society reports) of the risk of forced labour of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) as well as other regions in China. These concerns are closely linked to the cotton industry in the region. We issued a letter to all our suppliers forbidding the use of cotton from the Xingjiang region of China.

In 2021 and 2022 we began to map the province origins of all local migrant workers in China. We know that workforces in China are still predominantly migratory and there are 8259 local migrants in our supply chain. We continue to track all province origins of these workers as part of our Modern Slavery due diligence and assess whether there is a risk of Modern Slavery using industry and civil society reports.

# Summary of our progress to date

## Our five calls to action

The White Company's handwriting is one of timeless design – our product is made to be loved and last. We want to support our customers to do the same and to help reduce the dependence on finite resources, finding more sustainable or recycled alternatives. We have focused our Ethics & Sustainability journey around five key initiatives.



### Tackling the packaging monster

- All our paper and card is FSC recyclable and all online delivery packaging is 100% recyclable. Plastic usage has been reduced or removed, with all clothing bags now recycled and recyclable plastic and recycled cotton totes for all duvets and pillows. Polystyrene packaging and plastic parcel fillers have been eliminated. Refillable bottles are now offered within the Bath & Body range
- Our stores have partnered with First Mile, a zero-waste solutions company, working to recycle all store waste



### Preserving our precious planet

- Rapid growth of more sustainable fabrics across all ranges, where quality allows. These include TENCEL™ Lyocell/Modal, ECOVERO™, hemp and cupro bed linen, organic-cotton T-shirts and loungewear, eco-wash denim, The Good Cashmere Standard® cashmere, Responsible Wool Standard wool, responsibly sourced down, recycled-fill duvets and pillows, modal nightwear and organic-cotton baby sleepwear. All our timber is FSC certified, we have joined the Leather Working Group and have launched a responsibly sourced mattress range
- We have launched an organic essential oils range



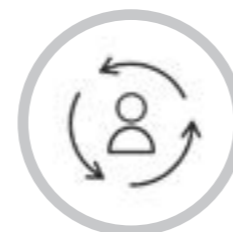
### Leveraging for longer life

- We have published our sustainable materials guide and fabric care advice to advise customers
- Our distribution centre recycles all waste and we have invested in a new packaging machine that reduces cardboard usage by 50% and courier collections by 30%
- We donate all faulty clothing to Newlife, the Charity for Disabled Children
- We have partnered with Thrift+ as a resale platform for our customers, extending the life of unwanted clothing



### Sourcing mindfully

- ETI Achiever level reached. Continued improvements to our updated Code of Conduct in line with legal and environmental standards
- We have mapped migrants in our supply chain, identifying them as some of the most vulnerable workers
- We have communicated and worked on a one-to-one basis with our suppliers throughout the Covid-19 pandemic, ensuring we are listening and reacting to the challenges they have faced



### Changing behaviours

- Diversity and Inclusion working party established
- Ethics & Sustainability steering group and B Corp working party created
- We have partnered with Thrift+ as a resale platform, encouraging our customers to re-think the lifespan of their garments



## Our future commitment

Climate change is one of the biggest issues facing our planet and we have to understand our footprint in order to reduce the impact. We aim to follow the life cycle of our product, taking accountability for responsible practices throughout our supply chain, such as growing textile fibres, manufacturing, packaging, shipping, garment care and recycling. We will invest in programmes that replace resources or educate producers and plan to set out a road map to show how we are progressing.



## Next steps

- Our ambition is to become an accredited B Corp Certified business. B Corp is a global non-profit NGO organisation providing an independent advisory and audit certification that ensures a level of commitment to sustainable practices that benefit businesses, their employees, suppliers, customers and the planet
- We have registered for B Corp assessment and established a working party to focus on our application
- We have established an Ethics & Sustainability steering group who share, coordinate and report on all new sustainability initiatives across the business
- We are working to increase the use of natural and sustainably certified materials, including an updated cotton-sourcing policy, and are committed to mapping our supply chain from farm to warehouse
- We are issuing an updated Code of Conduct to our suppliers and will further develop our policies addressing risks to workers' rights and Modern Slavery



# Glossary

## UNGP

The Guiding Principles (UNGP) seek to provide an authoritative global standard for preventing and addressing the risk of adverse human rights impacts linked to business activity.

## ETI Human Rights Due Diligence Framework

A guide for companies to help them prevent and manage labour rights risks, and understand why engagement, negotiation and collaboration is the only way to succeed.

## NGO

A non-governmental organisation is a non-profit, voluntary citizens' group which is organised on a local, national or international level. NGOs perform a variety of service and humanitarian functions.

## Outsourcing

Outsourcing involves suppliers subcontracting parts of production (steps in the manufacturing processes, e.g. sewing) to other suppliers or contractors that specialise in those activities. The White Company requires suppliers to declare any subcontractors for approval.

## Beyond Auditing

Innovative supply chain monitoring, capacity building or worker engagement programmes to help support positive impact or continuous improvement within supply chains.

