

The White Company Mindfully Sourced

Our Mission Statement

‘To be the global destination for effortless, stylish living.

We’re obsessed with our products and the stories behind them – carefully curating beautiful, useful pieces for you, your home and your family.

Mindful consumption is at our heart – buying better and buying less. Timeless, long-lasting and responsible products designed for today, tomorrow, forever. We are committed to building a sustainable legacy that will enable a brighter future for people and our planet.’

TWC CSR Pillars & Focus

Preserving our precious planet

Mindfully sourced

Tackling the packaging monster

Leveraging for longer life

Changing behaviours

Our Commitment to Mindfully Sourced product

Our commitment to mindfully sourced product always begins with the workers who produce our goods. We have been a member of ETI (Ethical Trade Initiative) for over a decade and have adopted their [\(ETI\) base code](#) in full. The ETI’s Code of Conduct is based on the standards set by the International Labour Organisation (ILO).

The ETI is an alliance of companies, trade unions and NGOs that promote respect for worker rights around the world. As members we work with the ETI to improve the workers’ rights by implementing the base code across our supply chain.

The Base Code applies to all supplier partners, factories, including subcontractors, home workers & packers as well as the extended supply chain of our products.

As a minimum, all factories, including sub-contractors, home workers & packers producing for The White Company, must comply with, and be able to demonstrate compliance to the ETI base code. It is an important responsibility for all suppliers to make sure the Base Code is fully communicated down their own supply chain.

Our supplier partners agree to our [Code of Conduct](#) which includes the ETI Base Code in conjunction with our expectations regarding workers’ rights and a transparent and visible supply chain and relationship.

Collaborations

Our ETI membership allows us to collaborate with peers in the industry, global trade unions and NGOs to improve the working conditions in our supply chains as an industry.

Collaboration is key to driving progress across our industry and joining forces with other like-minded businesses will add substantial value to our own efforts.

In addition to the ETI, we are also members of a UK retail small/medium brands working group, focusing our attention on the changes and challenges we face in our work.

We have worked consistently with NGOs and continue to attend key roundtable events in association with both Anti-Slavery Int. and Action Aid.

We believe in supporting change and are signatories of the [MHREDD](#) law joint statement sent to the UK Prime Minister.

Our own suppliers are collaborators, and we consider our partnership with them essential in developing and managing their supply chains. We invite our key supplier partners to an annual conference where we discuss and share ideas on key issues. Our top 20 suppliers, delivering 80% of our business are also scored annually across various areas: Profit, Product, QA testing, Quality, Delivery, Communication, Ethical, Environmental. We will request a SWOT analysis for any supplier scoring low on ethical or environmental that will include an action plan to address the issues. We encourage our suppliers to be constantly improving.

Governance Structure

CEO
Buying Director
Head of Sustainability
CSR Manager
Compliance Technologist
CSR Admin Assistant

Supply Chain Breakdown

TWC offers 1000s of products from around 250 [factories](#) and has a complex supply chain. We do not have a 'one size fits all' approach to assessing factories. We understand these complexities and where necessary, encourage the use of artisans, subcontractors, and homeworkers in the making of our unique products.

Most of our tier 1 sites fall into the 'standard' manufacturing unit or factory. In some countries, suppliers rely on supporting units to manufacture our product and use sub-contractors. These units are also counted as tier 1 sites as they manufacturer or assemble our final product. We work with 35 currently. These sites, depending on their size, will have a 3rd party audit or will complete the annual ethical self-assessment.

We also use smaller, artisan size units chosen for their craft skills. Due to the size of these units, we do not expect them to invest in 3rd party annual audits but instead expect an annual ethical self-assessment covering all areas of the ETI Base Code.

Across our diverse home products, we also rely on the unique craft skills of homeworkers. Homeworkers need the flexibility to work from home due to domestic obligations. We currently work with 24 Homeworker groups. Their skills include batik, seagrass weaving, metal work or hand embroidery. We have developed a homeworker assessment that is a simplified version of an ethical self-assessment. It covers health and safety, wages, and child labour. They are carried out and reviewed annually.

The White Company's Policy on 'Home-working'

The White Company is committed to improving working standards in its supply chains through the application of international labour standards. This includes a commitment to improving standards in those parts of the supply chain which are the most difficult to reach.

Historically, the lack of visibility of home workers in supply chains makes them a vulnerable group of workers. We take an open and positive position towards home working.

Our position

Acceptance of home working

The White Company believes that skilled home workers are important to the hand crafted, quality nature of many products. Often, home workers produce specialist components which cannot be made by machinery, or they can produce small quantities of intricate or high-quality items. From the home worker's perspective, the option to work from home can offer a degree of flexibility not met by traditional site-based work. Home workers frequently cite the advantages off-site working offers in enabling paid work to be balanced with domestic and family responsibilities.

Our Homeworker Commitment

We acknowledge that improving labour conditions for home workers is a complex issue. Under this home worker policy, we commit:

- To communicate our position on home working throughout our company and to those who supply to us
- To ensure that the presence of home workers in the supply chain will not lead to the relocation of work or cancellation of orders
- Work with our suppliers for the sustainable improvement of labour conditions with home workers in our supply chains. We will aim to do this by following the guidance set out in the ETI home worker guidelines

Our suppliers' commitments

We expect the suppliers we source from to:

- Declare all homeworkers involved in the manufacturer of our products
- Adopt a shared policy of acceptance of home-working and commitment to improving home workers' labour conditions
- Communicate this policy to all those in the supply chain below them, including home workers themselves.
- Work with us to identify where home working occurs in the supply chains beneath them
- Work with us to develop an action plan for improving labour conditions with home workers where these are found to be below those set out in the ETI Base Code

India Informal Workers

As part of our ongoing mapping and transparency process, we discovered 3 factories in Northern India that employed informal sub-contractors and homeworkers 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 goods supply chains in this region.

Improved working conditions such as access to clean water, fire-fighting equipment & 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.

Training local champions to take the work forward and make the impact more sustainable.

Raised awareness of entitlements & social entitlement schemes such as artisan cards
The project activities have benefitted over 100 workers from subcontractors and homeworkers in this informal supply chain.

Modern Slavery

All parties involved in the production of The White Company merchandise must comply with The White Company's Code of Conduct and the applicable law relating to slavery and human trafficking, including the Modern Slavery Act 2015, and must respect International Human Rights and applicable laws.

The White Company is committed to ensuring that no forms of modern slavery exist in our supply chain or business operations, and we expect all of our supplier partners to understand and identify vulnerable workers in their own supply chains.

Modern slavery can appear in many forms and we expect our suppliers to be fully aware of the [ILO Indicators of Forced Labour](#)

Human Rights Due Diligence

Monitoring & Mitigation

All of our supplier partners agree and sign our [Code of Conduct](#) which covers our workers' rights' expectations across our supply chain. This includes on-going, annual requirements as well as the onboarding process.

As well as signing our Code of Conduct, our suppliers must provide us with a 3rd party social audit as well as an ethical self-assessment. These are reviewed in conjunction with each other, and suppliers are then given feedback. It is not unusual for a factory to encounter non-compliances, and we work with the supplier to put corrective action in place with timelines depending on the severity of the issues raised. As a business we source 1000's of different products from 25 countries and we review each site based on geography and industry.

Our business is split into 3 categories, Home, Fashion & Little White Company, each with their own supply chains. We engage with the commercial buying & quality assurance teams to keep them up to date with their suppliers. In the event where a factory has a severe issue, we work with the commercial team and the supplier partner to discuss the root causes, the responsible person, additional trainings recommended, along with timelines for closure of issues. The factory will then be monitored overtime to ensure these issues are not repeated.

We pay particular attention to worker voice data, ensuring that all sites have a worker committee, with elected representatives as a minimum. We understand that strong grievance mechanisms and worker voices can enable non-compliances to be resolved without intervention.

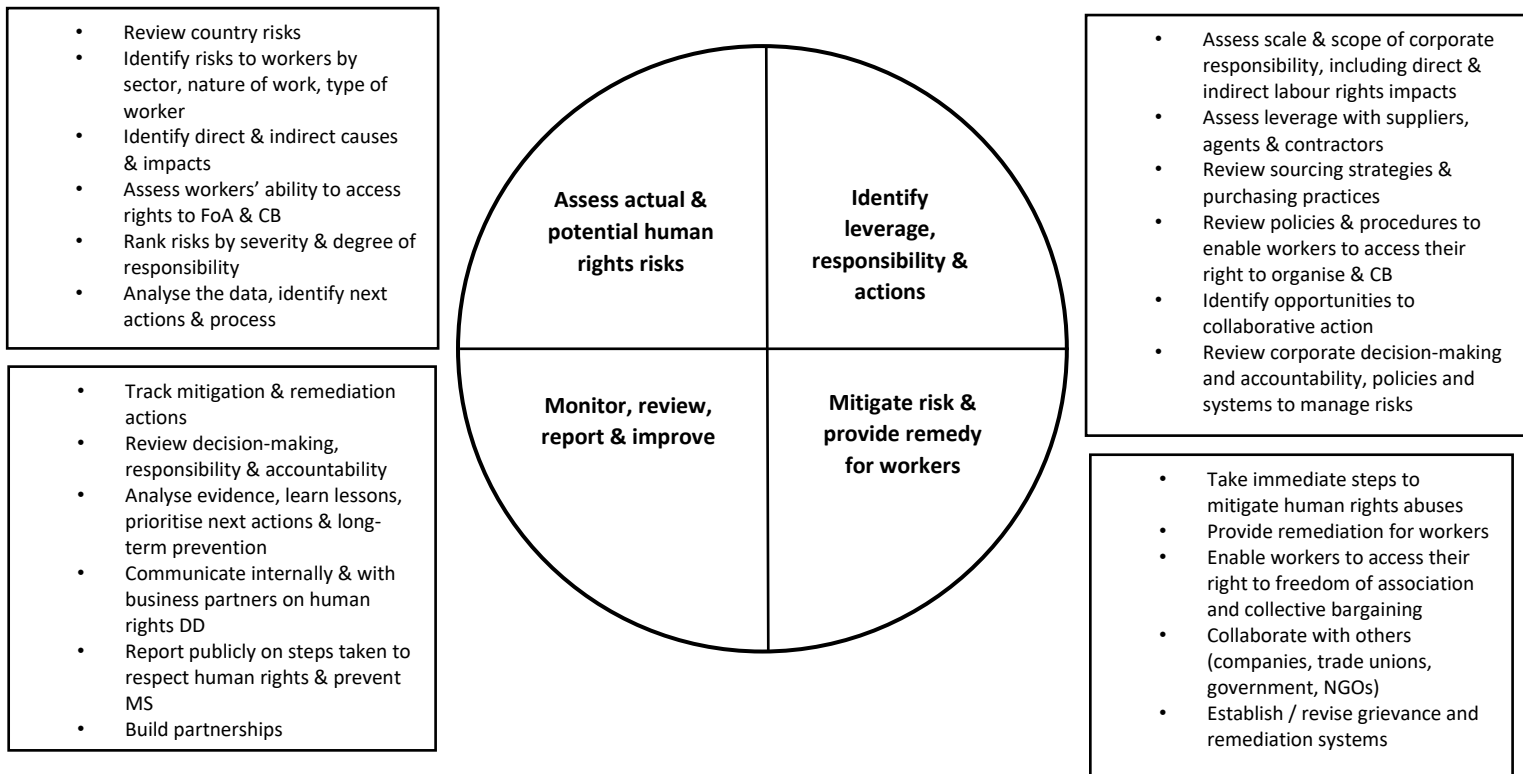
In addition to auditing our factories we also use a variety of frameworks and resources as part of our human rights' due diligence. We believe that audits only touch the surface of understanding risks in our supply chain, and we combine these results with country level risk assessments.

As an ETI member we use their Human Rights Due Diligence framework, which is in line with the [UNGPs](#) to help us identify and address actual & potential risks to human rights in relation to our purchases as a business.

The resources we use to grade risks to workers include the annual [ITUC Global Rights Index](#) that assesses workers' voices & rights globally, and we use the [USA Trafficking in Persons Report](#) that reports on modern slavery and human rights risks by country annually.

We combine these results with data on the most vulnerable workers in our supply chain and this directs our focus for our ethical strategy.

ETI Human Rights Due Diligence Framework



Through using this framework, we have identified our key risks based on country risk and total business placed in our Top 5 sourcing countries.

Country Priorities & Salient Risks

Country	China	Turkey	India	UK	Portugal
Salient Issues Identified	Forced Labour Lack of worker voice Local migrants	Int. Migrants	Migrants Women Lack of worker voice	Migration Forced labour	Migrants

Vulnerable workers

Migrant workers

Migrant Workers are commonly employed in supply chains where there is a lack of local labour, high levels of immigration due to conflict, or where there are established labour routes via labour agencies.

In these cases, this can often mean that they are provided little social protection, experience inequalities in the labour market which can then lead to discrimination, exploitation, forced labour and at times human trafficking.

Migrant workers can be categorised under either Domestic or International migrants.

Domestic migrants are those engaged in labour for which they have travelled to another region of their national state specifically for employment.

International migrants are those engaged in labour activities for which they have travelled to or been displaced to a foreign country or territory for employment and/or refuge.

Currently, in tier 1 of our supply chain, we have identified around 10,000 local & foreign migrants.

Informal Workers

Informal workers are those that are informally employed; in the case of TWC supply chain, this can be workers in subcontractors, agency workers or homeworkers.

These employees are not directly employed by a factory and so do not always have access to the same workers' rights as a formally employed person.

We are working towards identifying how many informal workers are in our tier 1 supply chain.

Women

Women make up over half of our supply chain and often can be discriminated against as employees. This can cause them to have reduced rights, a hidden voice and in some cases fear of harassment or abuse. Currently, in tier 1 we have identified 31,400 women.

Recent Responses to Human Rights Risks

Conflict Migration - Ukraine & The EU

In February 2022 Russia invaded the Ukraine, displacing over 7 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.

We worked with the ETI 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 *Ukraine Internal group*, *Labour Movement group* and the *Russia Sanctions group*. As we do not work with factories in Ukraine or have stores in Russia, we participated in the Labour Movement group.

We work with 33 tier 1 factories in the EU, including neighbouring countries to the Ukraine, Poland & Slovakia. We identified these as the priority countries where displaced Ukrainians were migrating to and set up calls with 4 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 the 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 & wages

- Accommodation & transport
- Integration & wellbeing

The survey identified 6 factories employing Ukrainians under the EU Temporary Protection Directive in Slovakia, Portugal, Poland, and Estonia. There were 31 displaced Female Ukrainians found employed in our supply chain. All sites were found to be following the guidance and supporting their employment and integration into their host countries.

China Forced Labour

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 2021-2022 we mapped the province origins of all local migrant workers in China. We know that workforces in China are traditionally predominantly migratory. In our supply chain there are 7,150 local migrants. We continue to track all province origins of these workers as part of our Modern Slavery due diligence and assess if there is a risk of modern slavery using industry and civil society reports.

Next Steps Focus Areas

Transparency

TWC Code of Conduct is applied to all Tier 1 manufacturers used for our production, and that these sites apply the Code of Conduct down their own supply chain down as far as raw materials.

Our focus as a business, is to gain transparency of our supply chain down to Tier 4. Over the next 3 years we will be working towards achieving full supply chain visibility and will expect our suppliers to be involved in achieving visibility of their own supply chain. We will expect our suppliers to work towards full transparency and be able to disclose Tiers 1 to 4 to TWC when requested.

Tier 1

This includes:

- Main production site of final product
- All sub-cons used to complete the manufacturing process
- All homeworkers used to complete the manufacturing process

Tier 2

This includes:

- All material producers for the final product, including but not limited to
 - Weavers
 - Fabric knitter
 - Yarn spinner
 - Tannery
- All embellishers to the final product, including but not limited to
 - Printers
 - Embroiderers
 - Beading

- Plating
- Pattern cutting
- All manufacturers of significant componentry – e.g., Frame manufacturers

Tier 3

This includes:

- All small components for final product, including but not limited to
 - Trims
 - Buttons
 - Thread
 - Screws
 - Electronics

Tier 4

This includes:

- All raw materials, including but not limited to
 - Textile fibres
 - Wood
 - Fragrance ingredients
 - Stone

We have identified that visibility of our Supply Chain is a key priority for our business. While we have transparency of all our Tier 1 sites and have carried out due diligence to identify risks in this tier, we know that working conditions and rights further down the supply chain can be critical if there is no visibility.

Our strategy will be to work with our supplier partners to map out our tier 2 sites down to raw materials at tier 4. We are starting with our Top 20 business suppliers, who provide us with over 80% of our product range, and we have partnered with [Supply Shift](#) to begin the process of mapping our supply chain. This will also allow us to gather key social and environmental data at the same time. Using this tool, we will be able to collect further, robust data on the salient issues identified to include the extent of vulnerable workers in our supply chain. Using this data, we plan to implement 'beyond audit' programmes to address the key issues affecting those making our products.

Transparency Social Focus Areas

- Understand worker voice & union engagement & mechanisms
- Understand 'Vulnerable' worker data
 - Women
 - Migration
 - Informal workers

In partnership with Supply Shift, we will be able to gain greater understanding of the salient risks and vulnerable workers and this in turn will enable us to form our next steps for improvement.