

THE WHITE COMPANY
LONDON

MODERN SLAVERY ACT STATEMENT 2024

August 2023 to July 2024



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 operations. Directly in our stores, offices and distribution centres, as well as indirectly through production facilities in our supply chain. Regardless of where people work, we believe everyone has the fundamental right to a fair, safe and healthy workplace and we stand firm in our commitment to respect human rights, fair labour standards and safe and healthy working conditions.

We have a zero-tolerance approach to modern slavery. As part of our commitment to respecting human rights, we are pleased to share our fourth Modern Slavery Act statement which covers the financial year ending July 31st 2024. This statement outlines the steps The White Company has taken to assess, identify, mitigate and prevent human trafficking and modern slavery from taking place within our business operations and supply chains.

As part of our continued sustainability commitment, we fully support the transparency in supply chains provision (Section 54) of the Modern Slavery Act 2015. 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 recognise that transparency plays a pivotal role in driving change and in supporting us to identify, mitigate and prevent infringements on the human rights of others.

This statement 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, ongoing journey.

Paula Nickolds,
on behalf of the board of directors
CEO, The White Company
January 2025

Our story

Founded by Chrissie Rucker OBE in 1994, The White Company has become one of the UK's fastest-growing multi-channel retailers and a leading lifestyle brand, with over 70 stores across the UK, including high-profile concessions in Harrods and Selfridges. July 2018 saw the opening of the first European flagship store outside of the UK in Dublin, while international expansion now includes a presence in the US – in Nordstrom stores nationwide – and in the UAE, with two stores in the prestigious Dubai Mall. The brand is now synonymous with impeccably stylish pieces for the home, wardrobe and everyday life – designed to be loved and last. As of 2024, The White Company is a certified B Corporation, meaning it meets high standards of social and environmental impact.

After over 30 years, Chrissie is still actively involved in leading the company. The Board of Directors is made up of 5 people – over 50% of whom are women.

The White Company employs approximately 1500 people across offices in London (Headquarters) and Northampton (Contact Centre).

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.

Terminology

- 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 and/or labour brokers to get their job and then spend most of their wages to pay off that debt. Workers who are in this situation are unable to quit their jobs, despite unfair or illegal conditions, because of their debts.
- Slavery: a situation where a person exercises perceived power of ownership over another person.

Our sourcing landscape

We work with a long-standing network of suppliers who share our values of accountability, transparency and stewardship. We carefully consider the suppliers we work with and the choice of materials we use. We do not own the factories and production facilities that produce our products; however, the partners we do work with are carefully chosen 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. The long-standing relationships we have with our strategic suppliers are based on trust, transparency and shared values.

Around 88% of products designed by The White Company come from five key countries, and the breakdown of sourcing countries by spend is as follows: China 32%, India 19%, UK 15%, Portugal 12%, Türkiye 10%.

We also source artisan or specialist products from other countries such as Denmark, Spain and Indonesia. In total, we work with more than 265 approved factories (Tier One) worldwide.





Due diligence and responsible sourcing

We have a dedicated Ethics & Sustainability team in our London head office who monitor and manage all risks associated within our supply chain. We recognise that without appropriate processes, our procurement and supply chain is vulnerable to modern slavery. Therefore, due diligence to mitigate and, where appropriate, remedy such risks forms the basis of the working relationship with our suppliers. Since 2012, we have been members of the Ethical Trading Initiative (ETI). The White Company's Code of Conduct policy is based on the **Ethical Trade Initiative 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 paid – to enable a standard of living that allows food, housing, education, healthcare
6. Working hours are not excessive
7. No form of discrimination is practiced
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 promote a safe and fair working environment and practices within our supply chain.

We benchmark 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 a fair, safe and healthy working environment 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 compliance audit – such as the Sedex Members Ethical Trade Audit (SMETA), or the Business Social Compliance Initiative (BSCI) – will typically include a physical tour of the factory and interviews with management, groups of workers and individuals. These interviews are verified against each other as well as against attendance, wage and health and safety records. These audits are the main instrument we have to ensure suppliers comply with our requirements, combined with supplier engagement. After the audit, 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 if there are any risks to workers' rights within our supply chain. Additionally, we use country-specific annual reports on workers' rights and human trafficking, for example the **Trafficking in Persons Report** by the U.S. Department of State and the **Global Right Index** published by the **International Trade Union Confederation (ITUC)**.

We continue to work closely with both the ETI and other members and industry peers to make improvements across our global supply chain.

Supply-chain transparency

Transparency plays a pivotal role in driving change, and it helps us identify, mitigate and prevent infringements on the human rights of others. It is vital that we have transparency within our factories and across our supply chain in order to assess and combat risks of modern slavery.

As part of our commitment to increase transparency within our supply chain and further down, we have partnered with Sphera and use their **Supply Chain Sustainability platform** (*formerly known as Supply Shift*).

This partnership enables us to better map our supply chain and further engage with our suppliers to obtain key data outside of traditional audits via a bespoke self-assessment. Using the data collected from the factories we work with, we are able to enhance our risk assessment – both environmentally and socially.

Please see below for an overview of the assessment framework and the topics covered.

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
Factory environmental governance	Policies Strategy and targets GHG, water and waste energy data
Factory multi-tier declaration	Transparency beyond Tier One

Last year, we launched Phase One of our transparency commitment, with a goal to fully map our supply chain up to Tier Four. We also assessed our 40 of our highest-value suppliers through a series of ethical, social and environmental questions, at both supplier and factory level, with a focus on collecting disaggregated data on workers' representation including the most vulnerable workers (informal workers, migrants and women).

The data collected covers key countries such as China, India, Türkiye, UK, Portugal and Vietnam, as well as smaller sourcing countries such as Lithuania, Madagascar and Poland.

In November 2024, we entered Phase Two of this project, looking at Tier Two of our supply chain and beyond. We have developed a comprehensive webinar and support pack for our suppliers to ensure they have a full understanding as to why we are asking for this information.

We are still in the process of receiving data from suppliers.





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 women, agency workers, subcontractors and homeworkers, as well as migrants both local and international. We are also aware that some industries and locales have higher risk levels, such as the cotton industry and China.

Using Sphera's Supply Chain Sustainability platform, we have mapped our Tier One factories that manufacture all our product, i.e. our main production sites. It is common for suppliers to use supporting units, known as subcontractors, to carry out specific processes as part of the production process. This can pose a risk. We insist that all suppliers declare any subcontracting to us, and we have identified 32 subcontracting units for primary parts of the production process e.g. sewing or assembly.

Country	Number of Tier 1 Subcontractors
India	11
Portugal	6
Vietnam	4
Indonesia	3
Türkiye	3
Spain	2
China	2
Vietnam	1

Alongside this, we recognise the importance and the unique skills of homeworkers, and have mapped major sources of homeworking. We have identified 26 homeworker agents using an approximate pool of 1021 homeworkers. All of these sites have completed our Homeworker Assessments, which are updated annually.

Country	Number of Homeworker Groups	Approximate Pool of Homeworkers
Vietnam	18	680
Bangladesh	2	300
India	2	23
Indonesia	4	18

For more information on The White Company's commitments to homeworkers, please see our latest Ethics & Sustainability report [here](#).

Another aspect of supply-chain mapping is identifying migrants, both local and international, within 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 five countries as follows:

Country	Number of Migrants	Local/International
China	8306	Local
India	4567	Local
Portugal	219	International
UK	441	International
Türkiye	38	International

In Portugal, we have seen an increase in recruitment of labour via agencies and from other countries, especially in southern Portugal. This is an area we will explore more in 2025. 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 a trend of foreign workers returning to their home countries.

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

Supplier

Direct supplier to The White Company who provides the final product.

Tier 1

Assembly of final product

Assembly of finished goods before being shipped to The White Company at primary production site(s), including authorised subcontracting.

- Processes include (but are not limited to) cutting, sewing, quality control and packing.

Tier 2

Components and processes required to produce the final product

Secondary components and processes that go into making the final product.

- Components include (but are not limited to) fabric/material, trims (zips, buttons, fusing, etc.) and packaging.
- Processes include (but are not limited to) knitting and weaving fabric, leather tanneries, beamhouses, blending fragrance oil, fabric finishing such as dyeing, printing and embroidery.
- Homeworking includes handcraft conducted outside of the primary production site such as embroidery, embellishment, printing, stitching, weaving and plaiting.

Tier 3

Tertiary processes required to produce the secondary components

Tertiary processes conducted to make secondary components that go into making the final product.

- Processes include (but are not limited to) fragrance ingredient processing, fibre spinning, slaughterhouses, timber sawmills and glass blowing.

Tier 4

Raw materials and ingredients

The cultivation or extraction of raw materials and ingredients, commonly derived from farm, forest and fossil fuels.

We will continue working with Sphera to map further down our supply chain. This will give us visibility of all factories making the key materials for our products. This will include fabrics, fragrance ingredients, knitwear yarns, wood processors, tanneries and more.

We will delve further into informal and migrant labour by visiting sites and investigating 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.



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. It is only by working with like-minded partners that we can 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 us with critical guidance and training. We attend regular industry meetings with our peers and competitors in the retail industry to share knowledge and experience on supply-chain overlaps. This is so we can collectively move forward as an industry and find solutions to shared challenges.



Freedom of Association

A key clause in the ETI Base Code is 'Freedom of Association (FoA) and Collective Bargaining'. It means that all workers have the right to join a union, or to bargain collectively for their rights, unless restricted by law.

Although 83% of our Tier-One sites have a form of worker representation, we do not have a clear understanding whether these committees, function correctly and fairly. Therefore, we plan to engage with factories to discuss the importance of worker representation and understand further the functionality of the committees to ensure they are working correctly.

Snapshot of implemented actions and ongoing work

Ukraine and the EU

Displacement of people through conflict puts them in a vulnerable situation and opens them up to dangerous situations including human trafficking, slavery and exploitation. The continued conflict between Russia and Ukraine has displaced over 7 million people into the EU, predominantly women and children.

Under the EU Temporary Protection Directive, displaced Ukrainians are eligible for employment, housing, healthcare and education benefits in the EU. We collaborated with the ETI, a peer membership group and the United Nations' International Organization for Migration to develop guidance to support displaced Ukrainians throughout the EU.

Various working groups were formed to address the key issues, including Ukraine Internal, Labour Movement 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 2022/23 we worked with 33 sites across the EU. In 2023/24 we worked with 61 factories, including four in Poland and Slovakia. As neighbouring countries to Ukraine, we identified Poland and Slovakia as the main destinations displaced Ukrainians were migrating to and set up calls with those 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 of our work 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 have seven sites employing Ukrainians but with a slight decrease to 75 workers, from 78 in the previous year.

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 – so, we have issued a letter to all our suppliers forbidding the use of cotton from the XUAR.

We began to map the province origins of all local migrant workers in China in 2021. We know that workforces in China are still predominantly migratory and there are 8,306 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 if there is a risk of modern slavery using industry and civil society reports.

Summary of our progress to date

In 2023/24, we focused predominately on strengthening our foundations. We experienced changes to our team structure, which resulted in a shift in priorities, so we took the opportunity to conduct a gap analysis of our own Ethics & Sustainability programme, to ensure we are robust and in a position to support and elevate workers' rights within our supply chain.

Strengthening our foundations

This year, we have introduced a monthly supplier-risk pack detailing high-risk factories, which we send to our Senior Leadership, Operating Board and CEO. To aid the close monitoring of workers' rights, we have introduced a critical remediation process, whereby our Ethics team work very closely with any high-risk suppliers to ensure issues are addressed fully, whilst encouraging suppliers to understand the root cause. The Commercial team is included in the remediation process for support, as well, and if the supplier fails to engage and address the critical issues we identified, the Head of the department is notified for further support. Failure to remediate beyond this point means the issues are discussed with the Director of department, meaning the Board is informed, including the CEO. We have also introduced training and working groups for all Product teams to ensure they have a full understanding of our Ethics & Sustainability programme, while providing them with the tools and support they need.

In light of news reports on child labour found within jasmine farms in Egypt, we took the opportunity to conduct additional due diligence on our own fragrance supply chain. This included a revision of our current fragrance sourcing policy to include an extra requirement for fragrance houses to ensure adherence to our own Code of Conduct at farm level. In addition, we have also conducted a risk matrix of all high-risk raw ingredients used within our products, which we plan to develop further.

Worker programmes

We are now in our third year working with CottonConnect, an organisation dedicated to the improvement of supply chains for the global cotton industry to ensure a fairer and more sustainable trade. They deliver training and know-how on sustainable farming methods to smallholder cotton farmers in Samul and Damietta, Egypt, helping them enhance the yield of their crop (and therefore their income) and reduce their impact on the environment. We're working with CottonConnect through their REEL Cotton Programme which allows us to source fully traceable cotton. In 2024, we launched our first REEL Cotton bedlinen within our Savoy range.





Better with B Corp™

Better with B Corp™ In February 2024 we became B Corp™ certified – a significant milestone that reaffirms our commitment to putting our people and the planet first. Our journey towards B Corp™ certification provided us with an opportunity to reflect and reassess every part of our business. In doing so, we have strengthened our foundations and improved our ways of working. The rigorous assessment process we went through measures companies on their internal processes, accountability and transparency from employee benefits and charitable giving to supply chain practices and environmental stewardship. The certification aligns with our commitment to continuous improvement as well, with assessments taking place every three years, leading to long-term resiliency.

Our commitment to sustainability

Climate change is one of the biggest issues facing our planet and we have to understand our footprint in order to reduce its impact. We aim to follow the lifecycle of our products and take accountability for responsible practices throughout our supply chain including growing textile fibres, manufacturing, packaging, shipping, garment care and recycling. We will invest in programs to replace non-sustainable resources, educate producers and plan to set out a roadmap to show how we are progressing.

Next steps

Mandatory modern slavery training on our Learning & Development platform

We recognise the importance training has in understanding the impact of modern slavery and other forms of human rights abuses. We will be launching mandatory modern-slavery training across the whole business on our new Learning & Development platform. In addition, we will be providing our product teams with training and guidance on 'what to spot' when they are inside the factories.

Increase training and engagement with suppliers and internal teams on risks

As a continuation of our aim to strengthen our foundations, we recognise the need for continued training and engagement with our suppliers, our internal Product teams and our Store teams. In addition to a critical remediation plan, we want to ensure we are engaging our suppliers fully on why they may have recurring issues in their factory, and provide them with the necessary support to ensure they can remedy those issues.

We want to ensure our Product teams all have a full understanding of why certain issues become salient, and what we can do collectively as a brand to implement positive change wherever possible.

We aim to equip our internal teams with the support and tools they need to better understand supply-chain risks.

Improve understanding of Freedom of Association functionality

We want to create a clearer understanding of the committees that make up the worker representation, currently in place in 83% of the Tier One factories we work with. In order to achieve this, we plan to engage directly with factory managers, discussing and emphasising the importance of worker representation and ensuring that the committees that are in place are working correctly.

