

THE WHITE COMPANY
LONDON

Modern Slavery Act Statement

APRIL 2019 - JULY 2020



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 July 31st, 2020. 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.

At the time of publishing our statement we are coping with the crisis of a global pandemic which has created many hardships for our supply chains worldwide. We consider our suppliers as partners in our business and will continue to do everything possible to support them through these difficult times.

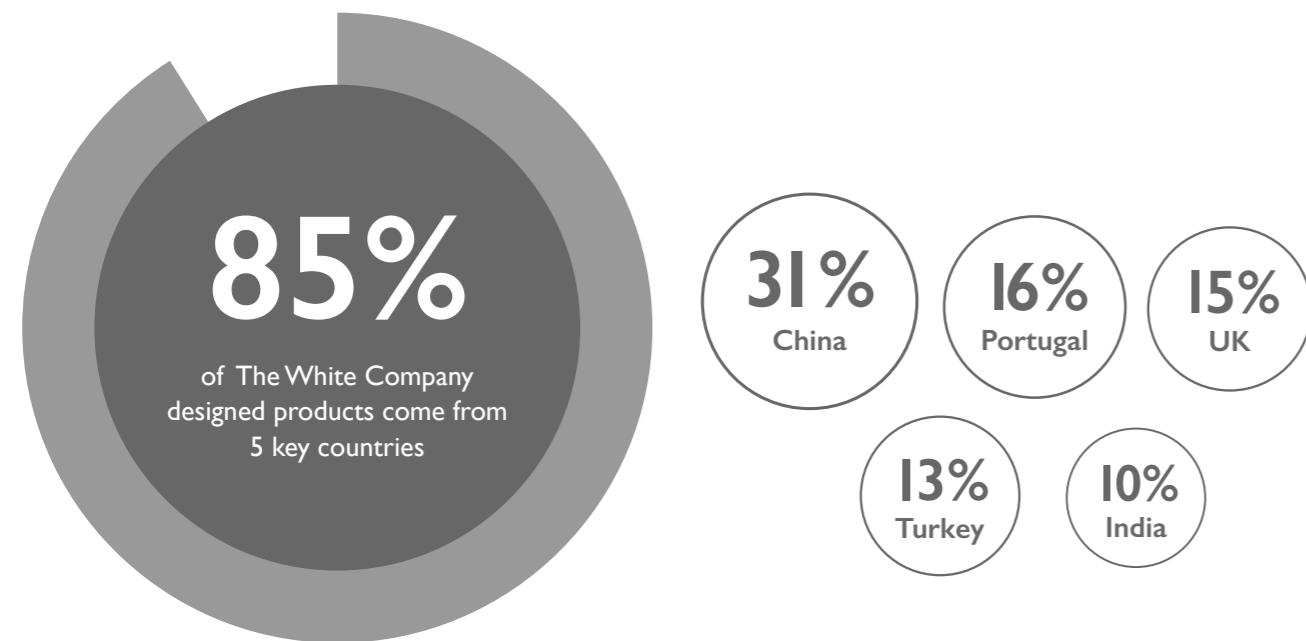
Mary Homer, CEO of The White Company
Signed on behalf of the Board of Directors

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 50 stores in the UK, concessions within luxury department stores, 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 1590 staff across our office, stores and in our distribution centre in Northampton.



We also source more artisan or specialist product from other countries such as Denmark, Spain and Vietnam. In total we work with 263 approved factories (Tier1) 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 - Is 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/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



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.

Responsible Sourcing at The White Company

We have a dedicated CSR team based in our London head office. Since 2012, we have been members of the Ethical Trading Initiative gaining Achiever level. 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 paid – to enable a standard of living that allows food, housing, education, healthcare**
6. **Working hours are not excessive**
7. **No discrimination practiced**
8. **Regular employment provided**
9. **No harsh or inhumane treatment 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. 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 a 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, 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. 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. If we believe so, we engage with them further, going 'beyond audit' through more in-depth assessments or through training programs. Details of this can be seen further on in this report in our snap-shot of implemented actions. We continue to work closely with both the ETI and other members to make improvements across our global supply chain.

<https://www.ethicaltrade.org/eti-base-code>



“In the past year, The White Company has increased its outreach to other stakeholders, such as with Anti-Slavery International, Oxfam and other peers. Some outreach directly to workers has increased this past year, which is commendable”

Ethical Trading Initiative | Annual Report Feedback |

January 2018

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.

We have mapped 100% of our Tier I 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/units that specialize in certain skills. This can pose a risk. We insist that all suppliers declare outsourcing to us, and we have identified 29 outsourcing units for primary parts of the production process e.g. sewing. Alongside this we recognize the importance of homeworkers and have mapped major sources of home working.

For more information on our home working position and code of conduct please visit <http://www.thewhitecompany.com/help/ethics>

We have a stringent onboarding process for any new supplier which includes an ethical self-assessment to encourage transparency that is then checked by a 3rd party social audit before we proceed. From April 2019 until March 2020, our product teams regularly visited our suppliers across the world. Unfortunately, all travel overseas has been curtailed due to the COVID-19 pandemic. We continue to communicate with them virtually and look forward to visiting again as soon as it is safe to do so



What Next

Our goal is to focus on transparency throughout our whole supply chain. Working in partnership with our suppliers, we have started the process of supply chain mapping. This is an ongoing process assessing the factories in each tier of the supply chain -



We have mapped 100% of our Tier I factories that manufacture all our product (main production site)

where the main materials are made (i.e. a fabric weaver).

where small components are made (i.e. buttons) or spinners, fiber-makers and recyclers.

either the farm, forest or factory producing the raw material (i.e. cotton farm). We are increasing the use of certified raw material products allowing us to gain visibility of tier 4 fibers. This will be achieved with the support of our suppliers who are sharing information of their processors, weavers and spinners. We are aiming for full traceability by the end of 2025.

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 Anti-Slavery, a specialist modern slavery NGO and key contributor to ETI Human Rights Due Diligence Framework who provide critical guidance and training. To support Syrian refugees employed in Turkey, we partnered with United Work Reintegration and Placement Services, an NGO funded by the Dutch government. In India, we collaborated with Traidcraft, a specialist NGO working with craft communities to build capacity and fight injustices in global trade.

Snap Shot of Implemented Actions and Ongoing Work

Turkey

In 2017, Turkey was highlighted as a key risk country due to the high number of Syrian refugees migrating to Turkey in order to escape the civil war and humanitarian crisis in their homeland. It is estimated that close to half a million Syrian refugees have made their way to Turkey or Europe and are employed in the informal sector (agriculture, construction, manufacturing, and textiles). They face the risk of modern slavery with unfavorable working conditions, unfair wages, long working hours and improper workplace safety and security.

In 2019-20, in response, we collaborated with our partners at Anti-Slavery Int. & United Work and arranged supplier conferences and workshops with our Turkish suppliers to focus on modern Slavery & supporting refugee workers including the remediation of unregistered Syrian refugees. We further collaborated with peer brands who source in Turkey to share knowledge and increase awareness. We worked closely with our suppliers monitoring the status of their workers and when unregistered refugees were found in one of their sub-contractor's units, we visited the site and helped support the Syrian refugees' transition to be registered allowing them to be able to continue working. We later facilitated a workshop where the supplier shared their experience of supporting un-registered refugees in supply chain.

This year we extended our supplier conference to include our Portuguese partners alongside our Turkish suppliers. The lead topic was Freedom of Association and the importance of workers voice. We appointed an industrial relations expert as the key speaker and intended that one of our Turkish suppliers would share their success in implementing effective worker voice mechanisms in the workplace. Unfortunately, due to the COVID-19 restrictions on international travel, we cancelled this year's conference. We plan to reinstate the conference as soon as travel can be safely permitted or will put in place a virtual alternative.

'While working on this topic we had received a big help and patience from The White Company and also learned a lot of information from United Work Istanbul Office'

Supplier Feedback | April 2019

As the Syrian refugee issue is very complex due to the unique status of the Syrian population in Turkey, such cases require systematic approach as well as flexibility and local expertise in the implementation of relevant standards. The White Company made sure to meet fully such requirements by approaching the issue in collaboration with ETI and through ETI they started collaborating with an expert local NGO in United Work, who has developed valuable capacity to undertake such complex cases

Ethical Trading Initiative | Annual Report Feedback | April 2019

...Snap Shot of Implemented Actions and Ongoing Work *continued*

India

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
- Raised awareness of entitlements & social entitlement schemes such as artisan cards

Between 2018-2020, the project activities benefitted 93 subcontractors and homeworkers in this informal supply chain. Due to the success of the project we are currently reviewing both an extension to the project at current units as well as expanding out to further workers in our supply chain.

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 have issued a letter to all our suppliers forbidding the use of cotton from the Xingjiang region of China and are in discussion with the Uyghur Coalition and 'Call-To-Action' to ensure greater transparency of further potential risks across China and the action required.



...Snap Shot of Implemented Actions and Ongoing Work *continued*



Covid-19 Response

The Covid-19 pandemic has had a devastating effect on all of us, both at home and across our global supply chain. With businesses forced to close across the world, we kept in daily contact with our suppliers to understand their problems and how we could support each other. We sent out a survey to gauge how the pandemic was affecting the workers in our supply chain, not just in terms of Modern Slavery but all workers' rights under the ETI Base Code. The survey investigated,

- Health & safety measures and training, including social distancing in the workplace
- Amendments to labour laws in each country
- Wages, state support, worker voice and representation during factory closures
- On reopening, the effect on worker numbers, workers' rights to not return, overtime as a response

Our survey was made under ETI guidance. All members were required to put in place an accountability mechanism, titled the 'ETI Enhanced Expectations'. The responses were fed into the combined ETI Enhanced Expectations member survey allowing everyone to better understand the key negative implications of the pandemic and where focus should be placed in future months. We paid in full for all goods ordered without cancellations however with so much unknown in April 2020, we temporarily extended our payment terms and worked with each supplier closely to make sure we were not causing any financial issues that could in turn affect the workers' rights and job security. We reverted to our original terms within four months. Our current payment terms are consistent with industry practice.

For more details, please read further here;

<https://www.ethicaltrade.org/enhanced-expectations>

...Snap Shot of Implemented Actions and Ongoing Work *continued*

Our Business - Distribution Centre/Northampton

Since 2017 we have been collaborating with NGO Anti-Slavery International to perform due diligence at our UK distribution centre. We wanted to better understand the conditions for temporary workers that are hired through external recruitment agencies and to assess any risks of modern slavery.

In November 2019, TWC's Corporate Social Responsibility Manager and an independent Anti-Slavery Global Human Rights Advisor conducted an assessment at our distribution centre. Interviews were held with workers. We cross-referenced the information provided by our recruitment agent assessing both the risk of modern slavery and the robustness of The White Company's monitoring systems. TWC's management and staff, the external recruitment company's management and 33 workers from 8 different nationalities (with interpreters where necessary) over a 3-shift, 24-hour period were interviewed.

The assessment confirmed that there were no cases of modern slavery within the facility. We identified medium-level risk factors and have recommended improvements to strengthen our labour provider's due diligence in systems and practices for the recruitment and management of temporary workers. Improvements include record keeping and the implementation of a temporary worker policy to ensure contracts are issued, receipts confirmed and that workers are paid accurately and on time. We also set out criteria for sub-contracting and continue to roll-out modern slavery training for both our labour provider and TWC staff. Our annual re-assessment in December 2020 was postponed due to Covid-19 social distancing measures.

'It should be noted that the continued independent annual review of working practices at TWC distribution centre demonstrates the company's commitment to human rights and ethical business practice'

Business and Human Rights Consultant | December 2019



Summary of Our Progress to date

Our 5 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 CSR and sustainability journey around 5 key initiatives.



Tackle 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 bags now recycled/recyclable plastic and recycled cotton totes for all duvets and pillows. Polystyrene packaging and plastic parcel fillers have been eliminated.



Preserve our Precious Planet

Rapid growth of more sustainable fabrics across all ranges where quality allows. These include Tencel, hemp and Cupro bedlinen, organic cotton t-shirts/loungewear, Eco-wash denim, The Good Cashmere standard cashmere, sustainably-sourced down, recycled fill duvets and pillows, modal nightwear and organic cotton baby sleepwear. We require all of our suppliers to commit to our TWCTimber Sourcing Policy.



Leverage 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 TWC products to Newlife the Charity for disabled children.



Mindfully Sourced

ETI achiever level reached. Continued improvements to our updated Code of Conduct in line with legal and environmental standards.



Changing Behaviours

Diversity and Inclusion working party established
CSR steering group and B-Corps working party created.



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 lifecycle of our product taking accountability for responsible practices throughout our supply chain from growing textile fibres, manufacturing, packaging, shipping, garment care and recycling. We will invest in programs that replace resources or educate producers and plan to set out a roadmap to show how we are progressing.



Next Steps

- Our ambition is become an accredited B-Corp Certified business. B-Corps is a global non-profit NGO organization 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-Corps assessment and established a working party to focus on our application
- We have established a CSR 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 worker 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 organization is a non-profit, voluntary citizens' group which is organized 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 specialize 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 programs to help support positive impact or continuous improvement within supply chains.

