

THE WHITE COMPANY
LONDON

Modern Slavery Statement 2025

August 2024 to July 2025

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Introduction

Modern slavery remains a significant global issue, affecting millions of people across countries, sectors and supply chains. Businesses have a critical role to play in identifying, preventing and addressing the risks of exploitation wherever they operate.

This statement outlines how The White Company identifies and manages the risks of modern slavery within our business and supply chains, and the steps we take to strengthen protections for workers. Our approach is informed by internationally recognised standards, including the [International Bill of Human Rights](#) and the principles set out in the [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#).

Published in accordance with section 54 of the [Modern Slavery Act 2015](#), this statement sets out our ongoing efforts to monitor, prevent and address modern slavery risks during the period from August 2024 to July 2025, as well as our priorities for the year ahead.

A note from our CEO

"At The White Company, we take great care and pride in the craftsmanship that goes into all our products. We believe everyone connected to our business – from the people who create and bring those products to life in our global supply chains, to our colleagues across our stores, offices and distribution centre – deserves to be treated with dignity and respect. Wherever people are based, we are committed to supporting fair, safe and healthy working conditions."



We take a clear and firm stance against modern slavery and human trafficking. In line with this commitment, we are pleased to publish our ninth Modern Slavery Statement, covering the financial year ending 31 July 2025. This statement outlines the actions we have taken to understand and address risks within our operations and supply chains, as well as the steps we continue to take to prevent exploitation.

Our approach aligns with our wider sustainability ambitions and our responsibilities under the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act and the Australian Modern Slavery Act 2018. We recognise that achieving transparency across complex supply chains takes time and ongoing effort, but it is essential to driving meaningful and lasting change.

This statement reflects where we are today and how we are strengthening our approach as we continue to learn, evolve and improve. We know our industry has a responsibility to people and the planet, and we remain committed to acting with integrity, so our customers can trust not only the quality of our products, but also the values behind them."

Paula Nickolds,
on behalf of the board of directors
CEO, The White Company
January 2026

Modern slavery and *how it presents itself*

Anti-Slavery International, the world’s oldest human rights organisation, defines modern slavery as a situation where “an individual is exploited by others for personal or commercial gain. Whether tricked, coerced or forced, they lose their freedom”. Modern slavery can take many different forms, including – but not limited to – human trafficking, forced labour and debt bondage.

Common forms of modern slavery

<p>Human trafficking</p> <p>Human trafficking involves the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud, coercion or deception, with the aim of exploiting them for profit.</p>	<p>Forced labour</p> <p>Forced labour refers to any work or service that people are made to do against their will, often under threat of punishment.</p>
<p>Bonded labour</p> <p>Bonded labour is a form of slavery where someone is required to work to repay a debt or loan, usually owed to an employer or landlord.</p>	<p>Child slavery</p> <p>Child slavery occurs when a child is exploited for someone else’s gain. This can include trafficking, forced labour, forced marriage or being held in domestic servitude.</p>

Modern slavery can affect people from all backgrounds, ages and ethnicities. However, exploitation is more prevalent among vulnerable groups, including people who have migrated from another country or those experiencing homelessness. Individuals from minority or socially excluded groups are also often at greater risk.

Modern slavery is much closer than many people realise. It exists not only in developing countries, but also in developed nations – including here in the UK. In 2024, nearly 20,000 potential victims were referred to the National Referral Mechanism (NRM), the UK’s framework for identifying potential victims of modern slavery – the highest number since the system began and a 13% increase on the previous year.

Victims and survivors of modern slavery often endure physical violence, psychological abuse, unsafe living conditions, unmanageable debts and restrictions on their freedom of movement. The impact of these human rights abuses on victims can be profound and long-lasting.

The scale of *modern slavery today*



Sources: [International Labour Organization. \(2022\). Global estimates of modern slavery: Forced labour and forced marriage.](#)
[International Labour Organization. \(2024\). Profits and poverty: The economics of forced labour.](#)
[Walk Free. \(2023\). Global Slavery Index 2023: United Kingdom country snapshot.](#)

Our business

The White Company is a privately owned British brand, founded by Chrissie Rucker OBE in 1994. What began as a small mail-order brochure offering a range of white essentials for the linen cupboard, has gradually grown into the ultimate luxury lifestyle destination. Today, we're a multi-channel global brand. Our products are available in 62 stores across the UK, 12 concessions within luxury department stores, two franchises in the United Arab Emirates and via our dedicated website both in the UK and the EU.

Headquartered in London, and with a contact centre and a third-party distribution centre in Northampton, we employ just over 1,500 people. Our distribution centre, operated by a third-party partner, employs 824 people in total, with approximately 300 working directly on The White Company operations.

The White Company has been members of the [Ethical Trading Initiative \(ETI\)](#) for over a decade and in 2024, we became a certified [B Corp™](#), joining a global community of businesses meeting high standards of positive social and environmental impact.

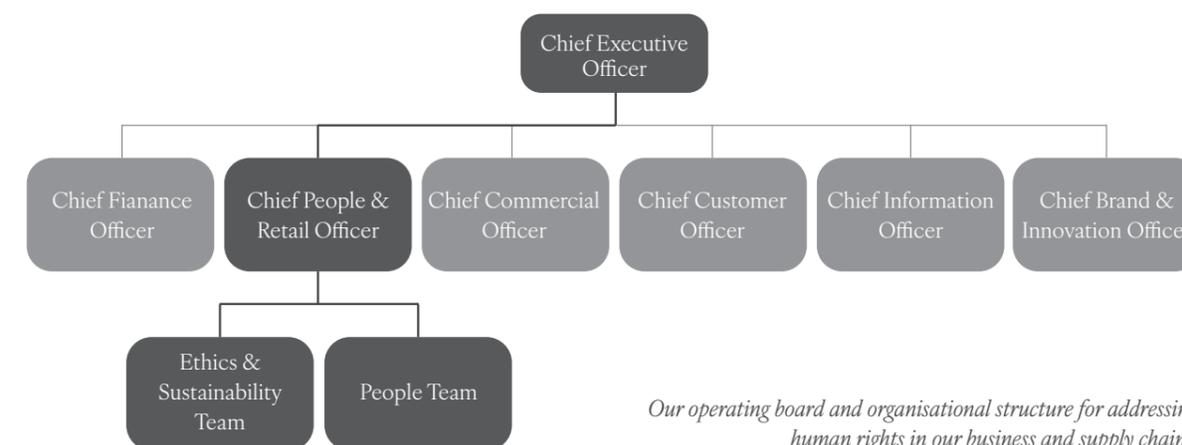


Internal governance and *accountability structure*

At the highest level, The White Company is overseen by its operating board. Led by our CEO, the board includes senior directors responsible for key areas of the business, with women representing 57% of its members. The operating board is responsible for upholding responsible business practices and taking appropriate action when issues or areas of concern have been raised.

Reporting into the operating board through the Chief People & Retail Officer, our in-house Ethics & Sustainability Team lead our approach to respecting human rights and labour standards across our supply chains. The team keeps the board informed of both potential and actual risks – including modern slavery – and provides transparent reporting on the progress we're making to identify, mitigate and address our human rights impacts.

Within the Ethics & Sustainability Team, each member is responsible for their specific area of expertise across ethics and sustainability. Also reporting into the Chief People & Retail Officer is our People Team, who are responsible for overseeing people, culture and employment practices within our direct operations.



Our operating board and organisational structure for addressing human rights in our business and supply chains.





Our supply chains

Our supply chain is split into two key channels: products for resale and GNFR (goods not for resale) and services.

Products for resale

Our product supply chains span four core divisions – fragrance, clothing, childrenswear and home. While we do not own the facilities where our products are made, we’ve built long-standing and trusted relationships with our partners, working closely with them over time.

GNFR and services

Our GNFR and services supply chain covers everything that supports our day-to-day operations, including store fixtures and fittings, IT equipment and office supplies, as well as information and technology, distribution and logistics and consultancy services. This part of our supply chain is managed by our Supply Chain Team and, where applicable, supported by our Ethics & Sustainability Team.

Our sourcing landscape

Established over many years – and in some cases, decades – we’ve carefully built a trusted network of supplier partners who share our values and help us deliver the exceptional quality we’re known for. Across our main product categories, we work with 158 suppliers in 249 tier-one facilities across 20 countries. While most of these sites are primary manufacturing units, some of our products rely on specialist skills that come from smaller artisan or subcontracted facilities, where experienced craftspeople carefully create individual components or finishes.

In FY25, our top ten sourcing countries, representing 99% of our purchased volumes, were China, the United Kingdom, India, Portugal, Türkiye, Vietnam, Denmark, Estonia, Poland and Indonesia.



Our policies

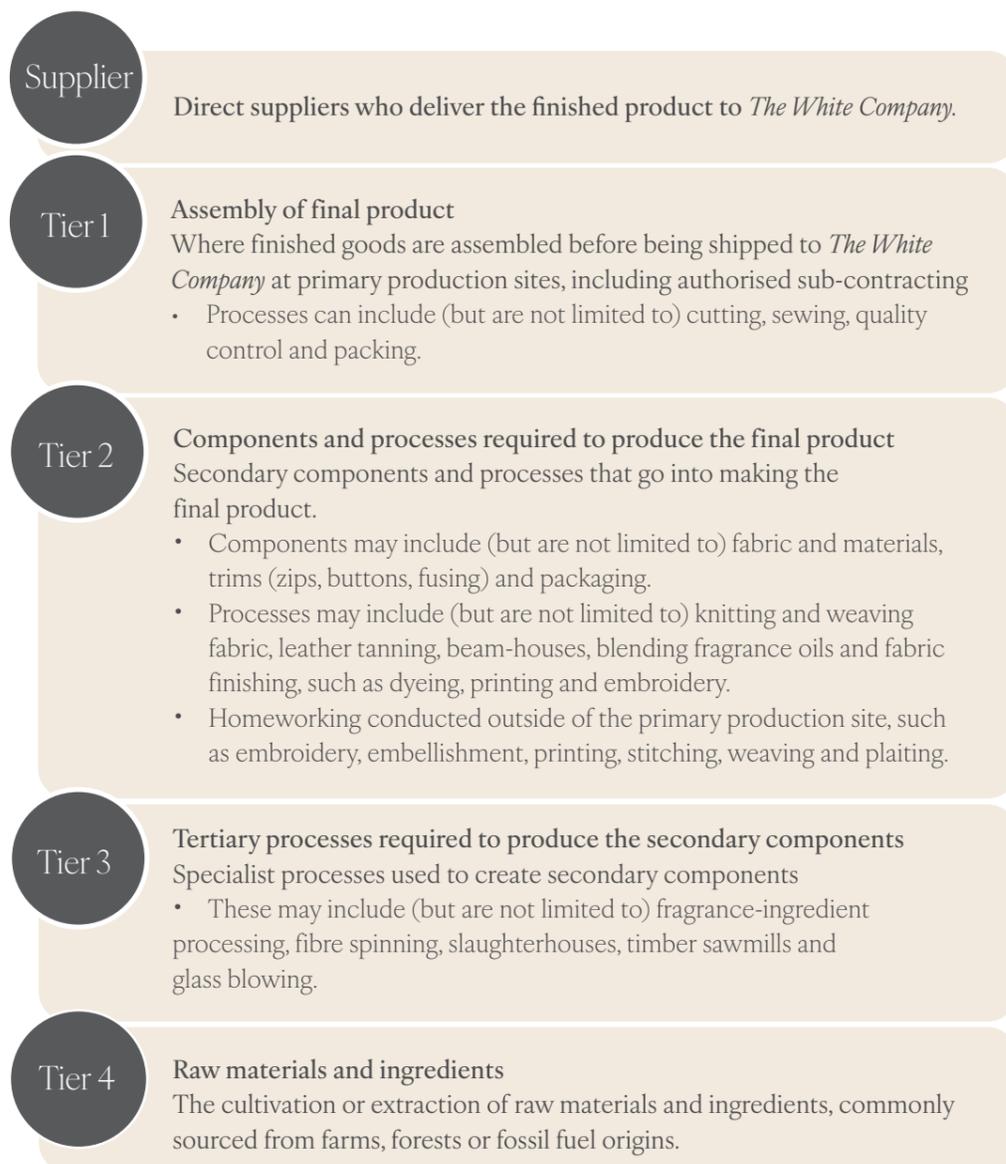
We have developed a suite of policies designed to respect, protect and, where needed, remedy the human rights and labour standards of those who work in our supply chains.

These policies set clear expectations for our teams, suppliers and business partners and form an important part of our human rights commitment. They include our [Supplier Code of Conduct](#) (which is based on the [ETI Base Code](#)), our [Cotton Sourcing Policy](#) and our [Homeworking Policy](#). As part of our commitment to continuous improvement, and outlined in our 2025 [Impact Report](#), we're committed to publishing the following policies next year, including our Human Rights Policy, Migrant Worker Policy, Worker Representation Policy, Child Labour & Young Worker Policy and Responsible Exit Policy.

Transparency

We recognise the pivotal role that transparency plays in driving meaningful change. It helps us better identify, prevent and address risks to human rights across our supply chains. While we already maintain a complete and detailed map of our tier-one facilities, we're continuing to strengthen our work by mapping the tiers beyond this – from the specialist processes and manufacture of supporting components in tiers two and three, to the raw materials in tier four.

While gaining transparency further down the supply chain will be ongoing, we remain committed to fostering a culture of openness with both our direct and extended supplier partners. To support this, we've partnered with [TextileGenesis™](#), an industry leading platform that helps us to trace our textile products all the way back to their raw materials. Alongside mapping the locations of our production facilities, this will allow us to capture richer information about the people and processes involved in the lower tiers of our supply chain.



©Alliance for European Flax-Linen & Hemp

Fostering a *culture* of openness

Each year, we publish our first-tier facility list on [Open Supply Hub](#). Sharing this information openly helps us work collectively on the more complex, systemic issues that none of us can solve alone. Last year, we were transparent about a longstanding confidentiality clause with one of our suppliers, who oversee four factories based in the Guangdong and Zhejiang provinces of China. This clause had previously prevented us from disclosing those factory sites. We're pleased to say we've resolved this issue, and that these factories are now transparently included in our facility list.

In addition, this year we have also published our [facility list with disaggregated worker data](#), further enhancing transparency and collaboration. While we commit to including them next year, our current facility list does not include our subcontracted facilities.



Our approach to *human rights* due diligence

Carrying out human rights due diligence is one of the most practical and credible ways for us to understand and manage our human rights impacts, helping us to protect the people who make our products and strengthen our supply chains. As global landscapes continues to change, we know how important it is to evolve the way we identify, prevent, mitigate and account for all human rights impacts. By looking at our supply chains through more specific lenses, we're better identifying and responding to key impacts that may exist in our operations and the facilities where our products are made, as well as in the countries where we source them.

At the heart of this work is a detailed map of our supply base, which brings together key details of our supply chain partners and their workforce and employment practices. It draws on data collected from our social audit programme – which checks how suppliers are meeting the standards in our [Supplier Code of Conduct](#) – alongside insights from our own supply chain visits.

We also use internationally recognised labour standards, country-level benchmarks and academic research, alongside guidance from multi-stakeholder organisations such as the [Ethical Trading Initiative \(ETI\)](#) and trade association, the [British Retail Consortium \(BRC\)](#). For risks related to modern slavery, we utilise the [International Labour Organisation \(ILO\) indicators of forced labour](#) – most recently revised in 2025 – as well as the [Global Slavery Index](#) and the Sedex Forced Labour Indicators Tool. Taking this broader view helps us learn from best practice and strengthen our approach to preventing, mitigating and addressing any actual or potential human rights impacts across our operations and supply chains.

Collaboration is equally important. By working alongside other certified [B Corps™](#) and peer brands, we can tackle deeper, systemic challenges that no single business can address alone. Our human rights due diligence process follows the [ETI Human Rights Due Diligence Framework](#), which aligns with the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#).

Assessing risks in our *supply chains*

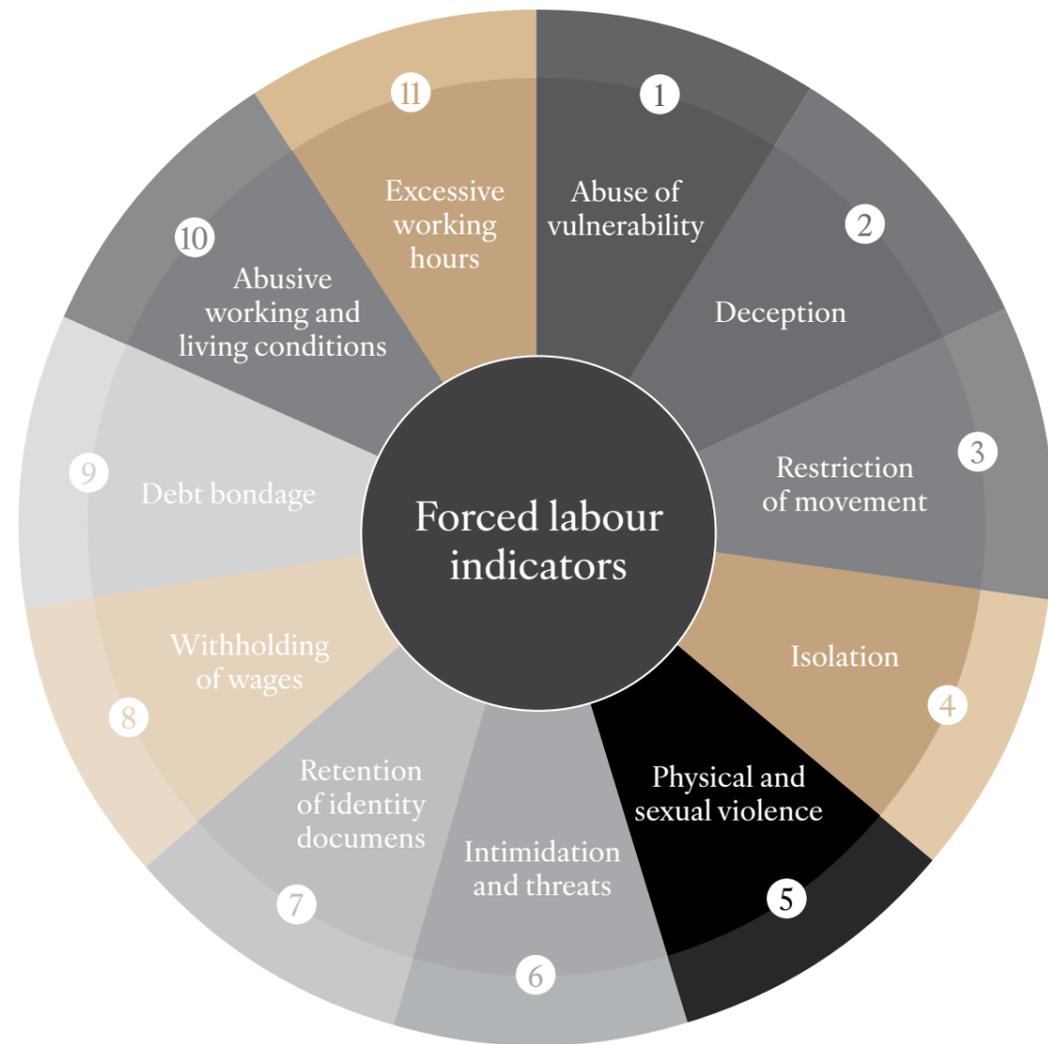
Our human rights risk-assessment runs throughout the year and helps us identify both actual and potential human rights impacts within our supply chains. To prioritise the most pressing issues, we consider how likely an impact is to occur and how serious it could be. By adopting the UN Guiding Principles on Business and Human Rights severity framework, we also examine the scale, scope and remediability to build a clear picture of how serious the impacts are, and where attention is most needed.

The prevalence of modern slavery

To better understand the risks related to modern slavery at a country level, we use the [Global Slavery Index](#), which provides national estimates of modern slavery across 160 countries. Alongside our standard due diligence processes, this helps us identify and prioritise countries where the prevalence of modern slavery is higher.

Based on our purchased volumes during FY25, we reviewed our entire sourcing landscape against the prevalence of modern slavery, using data from the Global Slavery Index which you can see [here](#).

Country	Region	Estimated prevalence of modern slavery per 1,000 population	Purchased volumes in FY25	Number of facilities
Türkiye	Europe & Asia	15.6	10%	12
India	Asia	8.0	13%	52
Slovakia	Europe	7.7	<1%	1
Bangladesh	Asia	7.1	<0.1%	1
Indonesia	Asia	6.7	<1%	5
Lithuania	Europe	6.1	<0.1%	1
Thailand	Asia	5.7	<1%	3
Poland	Europe	5.5	<1%	3
Czechia	Europe	4.2	<1%	1
Estonia	Europe	4.1	<1%	1
Vietnam	Asia	4.1	6%	9
China	Asia	4.0	37%	97
Portugal	Europe	3.8	13%	22
Nepal	Asia	3.3	<1%	1
Italy	Europe	3.3	<1%	2
Tunisia	Africa	2.3	<1%	1
Spain	Europe	2.3	<0.1%	1
United Kingdom	Europe	1.8	15%	13
Denmark	Europe	0.6	3%	1
Sweden	Europe	0.6	<0.1%	1



Forced *labour indicators*

Detecting forced labour is challenging, as it is often deliberately hidden and can present itself in subtle ways. To help us identify and prioritise risks related to modern slavery, we use the [ILO's indicators of forced labour](#), which sets out 11 common signs of coercion and lack of consent. Used alongside country-specific data and our standard due diligence process, these indicators help us spot potential early warning signs of modern slavery. This approach supports us in prioritising further investigation where needed and taking appropriate action.

In 2025, Sedex developed the [Forced Labour Indicators tool](#), which takes a data-driven approach to help identify potential indicators of forced labour across global supply chains. By analysing audit data, the tool highlights common signs that may point to the presence of forced labour, drawing on research from the ILO and other risk sources to generate a score that indicates the level of risk.

While we do recognise that audits have their limitations, they still play a valuable role in monitoring employment practices across our supply chains. With over 70% of our tier-one facilities audited to the SMETA standard, we have been able to leverage this tool to pinpoint specific hotspots within our supply chain that carry a higher risk – often due to geographic location or the nature of the processes carried out at those sites. Looking at both recent and historical working practices, we have generally seen a higher risk of forced labour in certain regions, most notably China, followed by India.

Empowering our teams *through training*

Last year, we committed to strengthening our training and engagement across the business. Over the past year, we've made meaningful progress in building internal engagement and ensuring that everyone in our organisation clearly understands our goals.

We have now launched mandatory training on modern slavery, with the aim that every colleague will have completed this by FY26.

In addition, we have delivered in depth training on supply chain ethics, both in person and online. During FY25, we engaged with over 300 colleagues through these sessions.



Our *modern slavery* risks

Our risk assessment process helps us identify the actual and potential risks related to modern slavery in our business and supply chains. By prioritising those with the greatest severity and likelihood, we can focus our resources where they matter most – taking targeted, meaningful action on the most pressing issues.

State-imposed forced labour risks linked to cotton cultivation and production

China	
Indicators of forced labour	Restriction of movement, abuse of vulnerability, deception, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, excessive overtime and abusive living and working conditions
Vulnerable groups	Ethnic minorities, domestic migrants and women
Affected rights	Freedom of movement and discrimination
Impact	Severe
Likelihood	Almost certain
Remediability	Low



Overview

The state-imposed and widespread abuse and exploitation against the Uyghur community within the Xinjiang Uyghur Autonomous Region (XUAR) has long been documented, with evidence suggesting that many members of the affected community face forced labour, both within the region and through labour-transfer schemes elsewhere in China.

Many sectors have supply chains that may be connected to these risks; however, cotton cultivation is particularly exposed. The XUAR produces around 80% of China's cotton, equivalent to approximately 16% of global cotton production.

Mitigation steps taken in FY25

We continued to maintain a detailed map of our supply base and workforce in China. This included:

- Regular communication with suppliers to understand recruitment practices and the employment of domestic migrant workers.
- Using external databases, such as the [UFLPA Dashboard](#) and [SupplyTrace](#), to monitor shipments potentially linked to forced labour.
- Assessing any connections between our suppliers and companies known to operate in the XUAR.
- Strengthening traceability for organic cotton through third-party certification and reinforcing our cotton policy, which prohibits cotton grown or processed in the XUAR.

Commitments in FY26

We will continue to build on our enhanced due diligence, with a strong focus on deepening supply chain transparency. Through our new partnership with [TextileGenesis™](#), we will trace our cotton supply chain using its Fibre-to-Retail module and innovative Fibercoin technology, enabling secure and verified traceability of certified materials.

Below, we share an overview of several of our salient risks relating to modern slavery, the steps we took in FY25 to mitigate them, and our commitments for FY26.

Gender-based violence and harassment

Global	
Indicators of forced labour	Abuse of vulnerability, withholding of wages, physical and sexual violence, intimidation and threats, excessive overtime and abusive living and working conditions
Vulnerable groups	Women, female migrant workers, female informal workers and young female workers
Affected rights	Equality and on-discrimination, dignity and bodily integrity, decent work, fair wages and safe working conditions
Impact	Severe
Likelihood	Almost certain
Remediability	High



Overview

Women make up a significant share of the global supply chain workforce, yet many remain in low-paid, insecure roles and are underrepresented in leadership positions. Structural and cultural norms often contribute to discrimination, including wage inequality, limited career progression and gender-based violence and harassment.

Mitigation steps taken in FY25

We continued to apply a gender lens across our due diligence process, expanding our collection of gender-disaggregated data. This has helped us deepen our understanding of the risks women face and assess how well they are represented in management.

Women account for 48% of the workforce in our supply chains, however we know from our analysis that they remain underrepresented in decision making and management positions – holding only 38% of management roles and 41% of supervisory roles.

Commitments in FY26

In 2026, we will develop a zero-tolerance policy for Gender-Based Violence and Harassment (GBVH). We will also partner with an expert women's organisation to ensure the strongest possible support for women who may be at risk.

Our *modern slavery* risks

Freedom of association

China, Türkiye & India

Indicators of forced labour	Abuse of vulnerability, isolation, physical and sexual violence, intimidation and threats, excessive overtime and abusive living and working conditions
Vulnerable groups	Migrant workers, women, young workers and informal workers
Affected rights	Fair wages, safe working conditions, freedom of association and collective bargaining
Impact	Major
Likelihood	Almost certain
Remediability	High

UN SDGs



Overview

We believe that everyone in our supply chains should have a voice in shaping better practices at the facilities where they work. This is a fundamental right for everyone, everywhere – enshrined in the Universal Declaration of Human Rights and a key clause in the ETI Base Code, which we are committed to championing and upholding. Yet in many instances, interference from employers and governments can prevent genuine representation and unionisation in workplaces.

Freedom of association and collective bargaining ensures that workers are free to join or form groups, organisations or unions to protect and promote their interests and rights. This can take many forms, including trade unions, independently elected worker representatives and worker committees. By keeping an open dialogue with management, workers have the power to raise the issues that matter to them, helping to improve standards, enhance health and safety and create a more equitable and enjoyable work environment. Dialogue with management also supports timely intervention, helping to resolve issues before they escalate.

Freedom of association is an “enabling right”, which empowers people to come together to protect all other rights. This makes it a cornerstone of respecting human rights in our supply chains. That’s why championing worker representation has become one of our strategic objectives. Here, we aim to promote freedom of association and increase the uptake of independent worker representation in our supply chains by evolving our internal policies, enhancing our mapping activities and continuing to engage with our supplier partners to strengthen their own understanding of it and the positive benefits it can bring to their businesses.

Mitigation steps taken in FY25

By applying a targeted freedom-of-association lens, we strengthened our human rights due diligence by:

- Mapping the different types of worker committees across our supply chain – the most common form of representation.
- Learning from best practices through our participation in the ETI Freedom of Association working group, helping us engage constructively with suppliers on the value of unionisation.
- Enhancing our understanding of grievance mechanisms in place to promote independence, confidentiality and meaningful improvement.

Commitments in FY26

As a strategic objective, we aim to promote freedom of association and increase the uptake of independent worker representation in our supply chains by evolving our internal policies, including the establishment our own standalone policy on freedom of association. We will also continue to enhance our mapping activities to assess existing worker representation mechanisms and to engage with our supplier partners to strengthen their understanding of, and promote, the positive benefits this can bring to their businesses.

Informal and vulnerable workers

Global

Indicators of forced labour	Abuse of vulnerability, deception, withholding of wages, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, debt bondage, excessive overtime and abusive living and working conditions
Vulnerable groups	Women, migrant workers, informal workers and young workers
Affected rights	Fair wages, safe working conditions and freedom of association
Impact	Major
Likelihood	Almost certain
Remediability	High

UN SDGs



Overview

Informal workers are essential to many global supply chains, yet their work often happens out of sight. This includes home-based workers – frequently women balancing family responsibilities – and migrant workers far from home. These groups face heightened vulnerabilities due to limited legal protections and visibility.

Mitigation steps taken in FY25

Given the hand-crafted nature of many of our products, skilled informal workers are part of our supply chains. This year, we:

- Continued expanding our supply base and workforce mapping to identify informal workers.
- Included informal workers within our risk assessments.
- Advocated for equal protections through our homeworker policy.
- Assessed working conditions for approximately 1,473 homeworkers, 73% of whom are women, reviewing lighting, ventilation, wage records and any indications of child labour.
- Strengthened our monitoring of migrant worker recruitment, accommodation, and participation in worker representation.

Commitments in FY26

We will continue to ensure informal workers are properly recognised and protected across our supply chains. This includes further strengthening our existing homeworking policy and introducing a standalone migrant worker policy that clearly sets out our commitment to supporting and valuing their contribution. Alongside this, we will keep collaborating closely with our supplier partners to improve working conditions identified through our assessment and encourage greater representation methods for informal workers.

THE WHITE COMPANY
LONDON

Modern Slavery Statement 2025

August 2024 to July 2025