THE WHITE COMPANY

LONDON

RESPONSIBLE MARKETING & PUBLIC RELATIONS POLICY

VERSION 1 | AUGUST 2026



Our Commitment

The White Company is committed to conducting its marketing, communications and public relations ("PR") with honesty, integrity, decency and respect for its customers and wider community.

We always strive to communicate in a way that is accurate, transparent, inclusive and socially responsible, while complying with all applicable laws and regulations, and industry standards. Our marketing and PR practices are designed to build trust, protect our reputation, and reflect our values by avoiding misleading claims, respecting individual rights, promoting diversity and inclusion, and considering the broader social and environmental impact of our communications.

Every employee involved in preparing marketing, communications, PR and other brand-related materials shares collective responsibility for upholding the principles outlined in this policy.

What is the purpose of this policy?

The purpose of this policy is to ensure that The White Company conducts its marketing, communications, and PR responsibly, reflects its overall social and environmental impact accurately and complies with the applicable laws and regulations in the markets where it operates.

Who is this policy intended for and what does it cover?

The scope of this policy applies to all marketing, communications and PR activities about The White Company, and its products and services conducted by, or on behalf of The White Company across all markets and communication channels. It sets the standard of conduct required by The White Company employees involved in marketing, communications, PR and other brand-related activities, third-party brands, licenced partners as well as external agencies, consultants and partners working on the behalf of The White Company.

This policy covers all forms of communication including, but not limited to, advertising, social media, influencer collaborations, content creators, public statements, press releases, events, sponsorships, product promotion (descriptions, packaging and labelling), store activities and on The White Company website.

Effective Date & review

This policy is effective as of FY27 and will be reviewed and updated on an annual basis to reflect changes in regulations, best practice and industry standards.

Governance

The White Company's governance is overseen by the Operational Board, which brings together the most senior leaders in our business to uphold responsible business conduct. The ***Responsible Marketing & PR Policy*** is overseen by the Operational Board with the Senior Leadership Team responsible for ensuring all marketing, communications and PR practices comply with this policy.

The ***Responsible Marketing & PR policy*** was prepared by the CSR team, with consultation from the Marketing and Compliance teams and approved by the Chief Customer Officer on behalf of the operational board. Any breaches of this policy will result in swift corrective actions and additional mitigation measures.

Role	Responsibility
Operational Board	➢ Oversee the Responsible Marketing & Public Relations Policy ➢ Take appropriate action when areas of concern have been escalated
Senior Leadership team	➢ Responsible for ensuring all marketing communications and PR practices comply with this policy ➢ Take appropriate action when areas of concern have been escalated
CSR team	➢ Prepare and approve social and environmental claims in line with this policy ➢ Review and update this policy on an annual basis ➢ Conduct regular internal audits to ensure this policy is being followed

	➢ Escalate and take appropriate action on areas of concern ➢ Consult and engage with the Marketing teams to monitor changes in industry standards ➢ Consult and engage with the Compliance Manager to monitor and act on changes in regulations and best practice
Marketing teams	➢ Prepare marketing, communications, PR and other brand-related activities in line with this policy ➢ Conduct publisher and platform due diligence before placing advertising ➢ Share this policy with all external agencies, consultants and partners working on the behalf of The White Company
Product & Compliance teams	➢ Share this policy with all third-party brands ➢ Ensure product related claims are in line with this policy ➢ Consult and engage with the Ethics & Sustainability Team to monitor and act on changes in regulations and best practice ➢ Report instances of non-conformity of this policy
IT Security/ Loss Prevention	➢ Ensure the privacy policy is updated regularly and in line with all applicable laws and regulations

Change log

Version	Date	Sections(s) updated	Description of change	Reason for change	Effective date
1.0	07/26	N/A	Initial issue. This policy supersedes TWC Policy for Promoting Sustainable Attributes On-Product v.02 (Aug25)	New policy	08/26

Section 1 | Responsible marketing, communications and PR activities

The White Company is committed to ensuring all marketing, communications and PR practices are guided by ethical principles, especially in context where audiences may be more vulnerable or where messaging has heightened emotional or social impact. This section sets out our core principles and requirements to uphold responsible marketing, communications and PR.

1.1 Core principles for responsible marketing, communications and PR activities

At a minimum, The White Company adopts the following principles in all marketing, communications and PR activities.

a) All marketing, communications and PR activities are truthful, non-deceptive, and aligned with The White Company values
b) Language is clear, understandable, and appropriate for the general knowledge level of consumers, avoiding jargon or complexity that could hinder understanding.
c) All claims reflect genuine practices and impact and are substantiated with appropriate evidence where applicable.
d) Claims will never exaggerate, manipulate or omit essential information.
e) The use of visual retouching across should be minimised and used only during post-editing (i.e. brightness, contrast and saturation control) to ensure technical quality. It should never be used to manipulate body shape or size in marketing, communications or PR materials.
f) The use of image retouching that could mislead customers about the efficacy or benefits of The White Company products should never be carried out.
g) Misleading, manipulative, or discriminatory content in any form is not tolerated in any marketing, communication or PR materials.

1.2 Advertising integrity and brand safety

The White Company will ensure that all media advertising is truthful, decent, sincere and not misleading. Due diligence shall be carried out on publishers and platforms ahead of placing advertisements to ensure its content does not appear alongside harmful content.

a) Targeting practices should not be discriminatory in nature and audiences and media environments should not be excluded based on characteristics, including but not limited to, religion or race.
b) Only collaboration with media environments that align with The White Company values and brand suitability should be sought.

1.3 Ethical media relations

The White Company engages with the media openly, respectfully and professionally, providing accurate and timely information, respecting journalistic independence, clearly identifying promotional content, and never offering incentives in exchange for favourable coverage. All media interactions shall be conducted in line with The White Company values, with a commitment to openness and integrity to maintain public trust

1.4 Inclusivity and representation

The White Company is committed to continually improving inclusive and respectful communications by using neutral language, representing people from diverse backgrounds and identities, and avoiding harmful stereotypes and unrealistic beauty standards.

a) The White Company is committed to continuously improving how we communicate and represent the diverse communities we serve. Our goal is to foster inclusive, respectful, and empowering narratives across all our marketing and communication efforts, and we recognise this as an ongoing effort.
b) The White Company aims to use neutral and respectful language, such as preferring terms like blocklist and allowlist over blacklist and whitelist, to avoid unintended connotations.
c) The White Company strives to ensure our campaigns reflect people of all backgrounds, ages, genders, skin tones, and body types, celebrating real beauty in all its forms. This is a continuous effort, and we're committed to improving representation over time.

d) The White Company seeks to avoid reinforcing harmful stereotypes or unrealistic beauty standards in our communications.

1.5 Children and youth

The White Company does not target anyone under 18 in its marketing or PR activities in line with our ethical standards and responsible marketing principles. Where children are featured, parental or guardian consent shall be obtained and follow all application laws and regulations in relation to working with children.

1.6 Influencer and social media responsibility

The White Company shall only work with influencers aged 18 or over who align with its values and produce truthful and non-misleading content.

a) Influencers and content creators are required to clearly disclose paid collaborations, advertisements, sponsorships, or commercial interests, regardless of their audience size or platform.
b) The White Company, together with its partners and influencers, share responsibility for ensuring that all influencer content is truthful and not misleading.
c) Influencers and content creators must align with The White Company values and not exaggerate claims.
d) Filters that alter skin, body shape, or size shall not be used as they may mislead consumers about product performance.

1.7 AI in marketing and communications

The responsible use of AI tools is permitted to support marketing and communications, provided all content is truthful, transparent, legally compliant and aligned with The White Company values.

a) AI-generated content must be decent, honest, and free from bias, discrimination, or stereotyping.
b) AI generated content creators shall not be used.
c) Additional AI principles and requirements can be found in ***The White Company IT Policy***.

1.8 Privacy and data protection

The White Company protects the privacy and confidentiality of any personal data used in marketing and communications.

a) The White Company activities comply with UK General Data Protection Regulation ("GDPR"), EU GDPR and other applicable laws and regulations.
b) ***The White Company Privacy Policy*** sets out how we collect, use and protect the data used in our marketing and communications.
c) Additional privacy and data protection principles and requirements can be found in ***The White Company IT Policy***.

Section 2 | Making social and environmental claims

The White Company commits to not making misleading social and environmental claims about its operations, services and products in all marketing, communications and PR activities.

2.1 Principles for making social and environmental claims

At a minimum, and in addition to the principles set out in section 1 of this policy, The White Company adopts the following principles specific to its social and environmental claims which meet the requirements of the applicable laws and regulations in the markets where it operates.

a) Claims are precise, verifiable, and substantiated using reliable or scientific data.
b) Claims are proportional to its actions and do not omit or hide important information.
c) Claims accurately reflect their applicable scope and are relevant to its impact and only make fair and meaningful comparisons.
d) Claims are truthful, accurate, transparent and account for both the positive and negative of The White Company operations and consider the full life cycle of its products.

2.2 Common words and phrases

To mitigate the risk of making unintended misleading claims when describing social and environmental performance or processes, The White Company has established risk levels and a claim hierarchy that should be followed when making claims and especially when using common words and phrases that are associated with or can be interpreted or imply positive social and environmental impact. This approach is designed to ensure that all marketing activities are considered and assessed against the principles in this policy. For guidance, a list of common words and phrases, as well as the claim hierarchy can be found in the implementation guidelines.

2.3 Claims using imagery, icons and symbols

Visual signs such as icons, logos and imagery must not be misleading and must depict the accompanying message truthfully and accurately.

2.4 Claims dependent on customer action

Where a claim is made that that relies on action by the customer, this must be outlined clearly and prominently alongside the claim.

2.5 Claims based on online filters and other navigational tools

The use of a name or other descriptive aspect for filters, drop-down menu options, or other ways of navigating to a group of products must not be misleading.

2.6 Claims based on specific ranges

Should specific product ranges carry a social or environmental claim, the criteria for inclusion must be set out on all channels where it is sold clearly and prominently, as well as in an easily identifiable and accessible location.

a) At a minimum, the criteria should provide a clear and prominent summary of the criteria for inclusion, including any minimum thresholds that may be part of the criteria, as well as access to the further details.
b) The same requirements apply when advertising or marketing on social media.
c) Should products be hyperlinked or referenced to in a social media post, website or on an in-store poster, as part of the advertising or marketing of a specific range, the landing page should only show products offered within the applicable Specific Range.

2.7 Claims based on targets

When social or environmental claims are made which are based on, or which reference, one or more targets relating to The White Company's impact, The White Company will set out clearly and prominently a summary of the nature of the target and a link or other access to further details.

a) Social and environmental target claims should only be made if they are based on, or reference to, a clear and verifiable strategy in place to meet them.
b) Social and environmental claims which are based on, or which reference, targets relating to The White Company's impact will be promptly removed or updated, if the relevant targets are either changed such that the claim becomes misleading or can no longer be met.

2.8 Claims based on specific aspects of a product's life cycle

Where The White Company makes a social or environmental claim in relation to a product which is not based on all aspects of its lifecycle, a summary must prominently set out the aspects to which the claim relates to, ensuring the claim is not misleading.

2.9 Claims based on certified materials

Claims based on certified materials should only be made when a product is made with a minimum of 50% of the certified material. All claims must follow guidelines issued by the certification standard and be approved by the CSR team and certification standard. All approved wording is recorded in the '***Approved Wording for Certified Materials'*** by the CSR team.

a) Where a product is described, listed, or referred to as being made with or containing a certified material, the certified material must be the primary material and reach a minimum 50%. The minimum 50% threshold cannot be made up of more than one certified material.
b) Where third-party certification requires a higher percentage threshold than The White Company, this must be prioritised.
c) Components outside of the main outer material such as lining, fasteners, buttons, zippers and are excluded from any certified material-based claims.
d) Filling components are permitted but must clearly and explicitly state that the claim refers to the filling and not the overall product.
e) Material claims that are not based on a recognised and independent certification schemes or by public authorities are prohibited and any existing claims will be phased out no later than FY28.

2.10 Certified material claims in product descriptions

Certified materials may be included in the product description only if they meet the highest level of certification and conditions of the following two thresholds.

a) Made with 100%: Only products or sets that contain 100% certified materials in its entirety, including all parts, can include the certified material in its description.
b) Made with a minimum of 70%: Products or sets that contain between 70% - 99% of a certified material in its entirety, including all parts, may include the certified material in its description providing the description clearly states the certified material is part of a mix or blend. Definitions are set out in the supporting implementation guidelines.

2.11 Certified material claims on care labels

A reference to certified materials may be included on The White Company care labels providing the highest level of certification is met.

a) A 30% threshold applies to the inclusion of a certified material on care labels
b) The following format should be followed when including all certified material, "100% cotton (organic - OCS)"
c) No additional claims are permitted on care labels.

2.12 Physical attribute labels and PDP claims

Physical attribute labels and Product Description Page ("PDP") claims may be used providing they meet the requirements below.

a) Only products that contain a minimum of 50% of a certified material may include a physical attribute label and PDP claim.
b) The minimum 50% threshold cannot be made up of more than one certified material.
c) If the full composition (100%) is made up of two equal certified materials (50%/50%), the preferred attribute label may be chosen. Where space allows, the PDP claim may include both claims.
d) Only one physical attribute label may be used and must correlate to the primary certified material.
e) All physical attribute labels and PDP claims must include a content statement. Depending on the composition, the statement should be one of two options:
    i. This product contains a minimum of 50% [certified material]
    ii. This product contains 100% [certified material]
f) Only approved wording included in the '***TWC Approved Wording for Certified Materials***' may be used on physical attribute labels and PDP claims and must be pre-approved with CSR and the third-party certification standard before publication.
g) When selecting a physical attribute label or PDP claim, care should be taken to consider the overall product (components & trims) to ensure the claim is relevant, proportional and not misleading.
h) Only products that have certification to the highest level may include a physical attribute label and PDP claim.
i) Only the main outer material is in scope. Other components such as lining, fasteners, buttons, zippers and are excluded from having a physical attribute label or PDP claim.

2.13 Accreditations

Where The White Company makes a social or environmental claim which is based on, or which references, an affiliation with, participation in, or any other form of association or collaboration with a third-party or accreditation scheme, The White Company will provide, at a minimum a reference to further details and a clear and prominent link to the third party's and/or accreditation scheme's website.

2.14 Overall impact on the environment

Social or environmental claims will not create a misleading impression about the overall impact of The White Company's business as a whole on human rights and environmental impact.

2.15 Claims based on the offsetting of carbon emissions

Claims based on the offsetting of carbon emissions are prohibited because they can mislead customers about the actual environmental impact of a product.

2.16 Claims based on comparisons

Social or environmental claims which use comparative terms such as stating that something is 'less harmful' or 'better' shall not be used unless this is directed by third-party accreditations, is readily apparent from the context, not misleading and robustly substantiated with third-party verification.

2.17 Claims made by third-party brands

Any third-party brand sold by The White Company must have controls in place to ensure they comply with the applicable laws and regulations in the markets where they operate. Before any third-party brands are sold via The White Company (in-store or online), a CSR assessment must be completed as part of the onboarding process to ensure due diligence is carried out and any risks identified before launch.