

THE WHITE COMPANY
LONDON

THE WHITE COMPANY
HUMAN RIGHTS POLICY

Our Commitment

At The White Company (TWC), people are at the heart of our business. From our store and office colleagues to those who work with us indirectly via our distribution centre and across our global supply chains, we believe everyone should be treated with dignity, fairness and respect. Regardless of where they work, we are committed to respect the human rights of those connected to our operations, products, services, and supply chains.

Purpose

Responsible business conduct is a fundamental principle at The White Company, and we accept our responsibility to act with integrity, care and transparency. This policy sets out our formal commitment to respect internationally recognised human rights and provides the framework that underpins our Modern Slavery Statement and broader sustainability commitments.

Scope

This policy applies to all business activities carried out by The White Company. We expect our suppliers and business partners to uphold the principles set out in this policy and to implement comparable commitments within their own operations and supply chains.

Defining Human Rights

Human rights are the fundamental rights and freedoms that belong to every person, everywhere. They are based on the principles of dignity, equality, fairness and respect. As both an employer and a buyer, we are committed to being a responsible and fair partner paying fair prices to our suppliers, supporting local communities, and ensuring safe, respectful and positive working conditions for everyone across our business and supply chains.

These rights include, among others:

- The right to work freely and without exploitation
- The right to safe and healthy working conditions
- The right to fair pay and reasonable working hours
- The right to equality and non-discrimination
- The right to dignity and respect
- The right to freedom of association

Respecting human rights means taking steps to ensure that our decisions, actions and business relationships do not cause or contribute to harm, and that we address risks where people's rights may be impacted.

International Human Rights Standards

Our commitment to respect human rights is guided by the [International Bill of Human Rights](#) and the principles as set out in the [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#).

Our approach to human rights is informed by the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#).

We are committed to comply with local laws and regulations protecting human rights in the countries where we operate. Where local laws and regulations are not fully consistent with the principles of internationally recognised human rights, we will seek ways to honour those principles in a manner respectful of local requirements.

We strongly believe that continuous engagement is the best way to contribute to lasting progress, and we recognise that some human rights issues across our supply chains are complex and require collaboration by different actors to be addressed. Through meaningful and effective stakeholder engagement we identify, assess and address human rights related potential and actual adverse impacts.

Identifying and Addressing Human Rights Impacts

We know that human rights risks exist in global supply chains, and we accept our responsibility to take proactive steps to identify, prevent, mitigate and account for adverse human rights impacts that we may cause or contribute to through our activities or business relationships.

As part of our commitment to respect human rights, we carry out Human Rights Due Diligence (HRDD) on an ongoing basis, which enables us to identify and assess actual and potential adverse human rights impacts, work to prevent and mitigate prioritised impacts,

and account for how we address these impacts. Where human rights are adversely impacted, we consider our connection to harm, significance of harm and the relative context to inform how we engage in remedy. Our due diligence approach also informs how we engage with employees, suppliers, partners, and other stakeholders, and supports continuous improvement in responsible business conduct.

Our efforts prioritised by our salient human rights impacts. These are the human rights at risk of the most severe impact on people across our operations and supply chains. We regularly review our salient human rights issues together with internal and external stakeholders to ensure their relevance and to define prioritised efforts and engagement. Our salient human rights impacts include state-imposed forced labour, gender-based violence and harassment, freedom of association and informal workers.

Due to the nature of our business, we focus primarily on the working conditions of colleagues in our operations and workers in our global supply chains.

Remedy

We recognise the importance of accessible and effective grievance mechanisms, and we are committed to strengthening our ability to respond appropriately to human rights impacts. We support open dialogue and transparent communication and encourage employees, workers, suppliers, and other stakeholders to raise concerns directly with us without fear of retaliation.

We also recognise the important role of state-based judicial and non-judicial mechanisms for individuals who believe their human rights may have been adversely impacted. We will not obstruct access to these mechanisms and will cooperate with relevant authorities where appropriate in the investigation or resolution of alleged human rights impacts.

We expect our suppliers to provide transparent, fair, and confidential grievance mechanisms for their workers and, where necessary, we will support the development and improvement of such processes. Where we identify that we have caused or contributed to adverse human rights impacts, we are committed to providing or supporting appropriate remedy and corrective action.

Roles & Responsibilities

This policy applies to all colleagues employed by The White Company and anyone working on our behalf, including subsidiaries, contractors and consultants. Suppliers of branded goods and franchise partners are also required to meet the responsibilities set out in this policy.

Failure to comply may result in allegations from individuals, scrutiny from the press and campaign groups, and reputational risk to the business. Where colleagues are found to have knowledge of human rights abuses in any part of the business and fail to act appropriately, this may result in disciplinary action, up to and including dismissal. Similarly, any concerns raised regarding human rights abuses within our supply chain will be thoroughly investigated, and our relationship with any non-compliant supplier will be reviewed.

Compliance with this policy will be monitored across all business areas through risk assessments, annual supply chain audits, investigations and site visits, alignment with related policies, and participation in collaborative, external multi-stakeholder initiatives. Key principles of international human rights include but not limited to

A Respectful and Inclusive Workplace

Fostering a culture where everyone feels valued and respected. We do not tolerate discrimination on the basis of race, gender, age, disability, religion, sexual orientation, marital status or any other protected characteristic.

We promote diversity, inclusion and equal opportunity, and expect all colleagues to contribute to a working environment built on mutual respect.

Safe and Healthy Working Conditions

Providing safe and healthy working conditions and complying with applicable health and safety laws. We continuously seek to improve standards to protect the wellbeing of our colleagues.

Fair Pay and Working Hours

Paying wages that meet or exceed legal minimum requirements and complying with applicable laws relating to working hours, rest periods and overtime.

No Forced or Child Labour

Maintaining zero tolerance for modern slavery, forced labour, bonded labour or human trafficking within our operations or supply chain. We do not permit child labour and expect our suppliers to adhere to minimum age requirements in line with international standards.

Freedom of Association

Respecting the rights of employees to freedom of association and collective bargaining in accordance with applicable laws.

Dignity at Work

Prohibiting harassment, bullying, intimidation or any form of inhumane treatment. Every individual connected to our business must be treated with dignity and fairness.

Supplier Responsibilities

We work closely with our suppliers and business partners to ensure that our standards are understood and upheld. We communicate our expectations clearly through our Supplier Code of Conduct and ongoing engagement. We undertake risk assessments and due diligence appropriate to our business and will take action where we identify human rights risks or breaches.

We are committed to continuous improvement and transparency in how we manage human rights risks within our supply chain.

We expect the suppliers we source from to declare all facilities and associated risks involved in the manufacture of our products to TWC Ethics & Sustainability Manager

Concerns can be raised directly through line management for employees, through the Buying team and directly to the TWC sustainability team sustainability@thewhitecompany.com

Governance

Responsibility for overseeing and implementing The White Company Human Rights Policy sits with the Operational Board, which brings together the most senior leaders in our business to uphold responsible business conduct, as well as providing strategic oversight of our human rights commitments, risks, and performance.

Senior leadership is responsible for ensuring that respect for human rights is embedded into the company's culture, decision-making processes, policies, and operational practices.

Day-to-day responsibility for managing human rights risks and implementing this policy is assigned to relevant functions across the business, including but not limited to People & Culture, Ethics & Sustainability, Compliance, Product, and Supply Chain teams. These teams work collaboratively to identify, assess, prevent, mitigate, and address actual and potential human rights impacts connected to our operations and supply chains.

As standard, we integrate human rights considerations into key business processes, including:

- Supplier onboarding and procurement practices
- Risk management and due diligence activities
- Recruitment and employment practices
- Health, safety, and wellbeing programmes
- Diversity, equity, and inclusion initiatives
- Training and awareness programmes
- Whistleblowing and grievance mechanisms
- Ethics and sustainability reporting

We recognise that effective human rights management requires ongoing engagement, monitoring, and continuous improvement. As standard, we therefore commit to:

- Regularly reviewing our policies, procedures, and practices
- Monitoring emerging human rights risks and stakeholder expectations
- Assessing the effectiveness of our due diligence and mitigation measures
- Providing appropriate training and awareness across the organisation
- Encouraging collaboration and dialogue with employees, suppliers, business partners, and other stakeholders
- Taking corrective action where issues or non-compliance are identified

Approved by	Operational Board
Policy owner(s)	Head of Ethics and Sustainability
Supporting owner(s)	Senior Quality and Compliance Manager
Effective date	08 2026
Review frequency	Annual (pending standards or regulations change)