

THE WHITE COMPANY

LONDON

The White Company Supplier Manual

SECTION 2

The White Company's Code of Conduct and Factory Set Up Form



The White Company Supplier Manual

Section 2

Code of Conduct

The White Company are committed to only offer for sale products that have been produced without the exploitation of people, planet, or animals.

We are constantly striving to make improvements in sourcing ethical product and we expect our supplier partners to share this commitment and to comply with the following codes of conduct.

The following outlines our expectations of our suppliers, their own supply chains as well as the materials they use.

2.1 People

The ETI Base Code & Local Labour Laws

The White Company has been a member of ETI for over a decade and have adopted the Ethical Trading Initiative (ETI) base code in full as its Code of Conduct. This applies to all suppliers, factories, including sub-contractors, home workers & packers as well as the extended supply chain of our products.

As a minimum, all factories, including sub-contractors, home workers & packers producing for The White Company, must comply with and be able to demonstrate compliance with The Ethical Trading Initiative Base Code (ETI base code).

As a member we must also publish all Tier 1 production sites, names & addresses, that manufacture our goods on our website. The Tier 1 Information we publish will therefore include all factories and manufacturing sub-contractors that make The White Company Products.

It is an important responsibility of Suppliers to make sure this is fully communicated down your supply chain. Suppliers should familiarise workers throughout their supply chain with the ETI Base Code and display a copy, translated into the local language, at each of their production facilities in a place visible and accessible to workers. Translated versions of the code can be downloaded at <http://www.ethicaltrade.org/resources/key-eti-resources/eti-base-code>.

Where local laws are found to be over and above or supplement our Code of Conduct these must be adhered to, and visibility of these laws communicated openly with The White Company.

Any supplier who accepts an order from The White Company makes a commitment to deliver only product / goods that meets our customers' expectations as well as the Terms & Conditions of Trading and therefore must operate within this Code of Conduct.

Any deviations from the Code will need to be raised and action plans put in place to achieve compliance. Measurement of compliance with this Code of Conduct will be based on recognized industry standards and prevailing regulations where they exist. The White Company will take positive steps to ensure that their requirements are being enforced.

The Ethical Trading Initiative - ETI - Base Code

1. Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative

4. Child labour shall not be used

- 4.1 There shall be no new recruitment of child labour
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. *
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay
- 6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below

6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law.
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies

6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

7. No discrimination is practiced

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

Modern Slavery

All parties involved in the production of The White Company merchandise including Suppliers and designated factories with all units and subcontracting units declared and approved by The White Company must all comply with The White Company's Code of Conduct and applicable law relating to slavery and Human Trafficking including the Modern Slavery Act 2015, and respects International Human Rights and applicable laws.

The White Company are committed to ensuring there are no forms of modern slavery in our supply chain or business operations, and we expect all of our supplier partners to understand and identify vulnerable workers in their own supply chains.

Modern slavery can appear in many forms and we expect our suppliers to be fully aware of the ILO Indicators of Forced Labour [https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm](https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang-en/index.htm)

If you are aware or made aware of any of these indicators in your supply chains, we expect you to declare these to TWC CSR Manager immediately. We commit to working with our suppliers to identify and remediate any forms of modern slavery.

Monitoring

All factories, sub-contractors, home workers & packers manufacturing product for The White Company must adhere to this Code of Conduct and must ensure that we are provided with an annual 3rd party, semi-

announced social audit (preferably a SMETA) along with all corrective action to be sent to, reviewed and approved by TWC CSR manager.

Exceptions to the annual audit can be made in agreement with the supplier and The White Company when 2 years of 3rd party social audits have shown no or only minor issues. This is to be discussed and agreed with TWC CSR Manager.

If Suppliers or Agents to The White Company are aware that a factory, sub-contractor, home worker unit or packer cannot meet the conditions of The White Company's Code of Conduct, this must be made known to The White Company's CSR Manager as soon as possible.

Failure to meet the requirements of the Code of Conduct requires an agreement to be reached on an acceptable action plan within agreed timescales. Failure to do this to this will result in a review of future business and may lead to cancellation of existing orders.

A 3rd Party Audit booking will be required if one is not available for review – this would be at the cost of the Agent / Supplier / Factory.

The White Company will keep all information gathered regarding compliance with the Code of Conduct and each Supplier's factory base, confidential.

Corrective actions must be completed and closed off within an agreed timeframe of an audit as determined by TWC. Should there be outstanding corrective actions still to address beyond this agreed timeframe, The White Company reserve the right to terminate working relationships with a supplier should we believe there is a significant risk to our products or brand, and the supplier will forfeit any payment for pending orders.

Onboarding Factories

To initiate business with The White Company each factory is required to complete an ethical self-assessment form and a recent 3rd party, semi-announced social audit (preferably a SMETA) for review for the Tier 1 site manufacturing our product. All sub-contractors, homeworkers, packers supporting the manufacture of these products must also be declared, self-assessed and reviewed at this stage.

Relevant technical forms as well as acknowledgement to policies which relate to the products you manufacture are also required.

Your TWC Technical contact will send these through accordingly. It is imperative that these are fully completed with all supporting documentation sent, as the supplier / factory onboarding process cannot be authorised without full cooperation during this stage.

Only once we are happy that the new site is complying with our Code of Conduct, we can approve the new site and purchase orders can be issued.

Subcontractors

TWC describe a subcontractor as a unit carrying out the manufacturing or assembly of our final product. We consider subcons to be tier 1 and must be declared, assessed, and approved for use by TWC.

E.g., In the case of textiles, a sub-con may be an additional unit either cutting, sewing, ironing our product.

Scope & Tiers

We expect that the Code of Conduct is applied to the Tier 1 manufacturers used for our production and that these sites apply the Code of Conduct down their own supply chain down as far as raw materials.

As a business we are working towards full visibility of our supply chain and we expect our suppliers to work towards gaining visibility of their own supply chain and to disclose Tiers 1 to 4 with the CSR Manager, Technologist and buying teams when requested.

We will keep you updated on the development of our mapping system but in the meantime, we expect our suppliers to work towards full transparency.

Tier 1

This includes:

- Main production site of final product
- All sub-cons used to complete the manufacturing process

- All homeworkers used to complete the manufacturing process

Tier 2

This includes:

- All material producers for the final product, including but not limited to
 - Weavers
 - Fabric knitter
 - Yarn spinner
 - Tannery
- All embellishers to the final product, including but not limited to
 - Printers
 - Embroiderers
 - Beading
 - Plating
 - Pattern cutting
- All manufacturers of significant componentry – e.g., Frame manufacturers

Tier 3

This includes:

- All small components for final product, including but not limited to
 - Trims
 - Buttons
 - Thread
 - Screws
 - Electronics

Tier 4

This includes:

- All raw materials, including but not limited to
 - Textile fibres
 - Wood
 - Fragrance ingredients
 - Stone

The White Company's Policy on 'Home-working'

Background

The White Company is committed to improving working standards in its supply chains through the application of international labour standards. This includes a commitment to improving standards in those parts of the supply chain which are the most difficult to reach.

Historically, the lack of visibility of home workers in supply chains makes them a vulnerable group of workers. We take an open and positive position towards home working.

Our position

Acceptance of home working

The White Company believes that skilled home workers are important to the hand crafted, quality nature of many products. Often, home workers produce specialist components which cannot be made by machinery, or they can produce small quantities of intricate or high-quality items.

From the home worker's perspective, the option to work from home can offer a degree of flexibility not met by traditional site-based work. Home workers frequently cite the advantages off-site working offers in enabling paid work to be balanced with domestic and family responsibilities.

Commitment to improving home workers' conditions

We also acknowledge that labour conditions enjoyed by home workers may not meet those set out in the ETI Base Code. We are therefore committed to taking action, together with our suppliers, to improve these conditions. The first step in such action, we believe, is to make our position on home-working clear.

Defining 'home work'

The definition of 'home work' is based upon the International Labour Organisation (ILO) definition (dating from 1996) which states:

(a) the term 'home work' means work carried out by a person, to be referred to as a 'home worker', in his or her home or in other premises of his or her choice, other than the workplace of the employer, for remuneration.

(b) which results in a product or service as specified by the employer, irrespective of who provides the equipment, materials or other inputs used, unless this person has the degree of autonomy and of economic independence necessary to be considered an independent worker under national laws, regulations or court decisions.

(c) persons with employee status do not become 'home workers' within the meaning of this Convention simply by occasionally performing their work as employees at home, rather than at their usual workplaces.

(d) the term 'employer' means a person, natural or legal, who, either directly or through an intermediary, whether or not intermediaries are provided for in national legislation, gives out 'home work' in pursuance of his or her business activity.

Our commitment under this policy

We acknowledge that improving labour conditions for home workers is a complex issue. Under this home worker policy, we commit:

- To communicate our position on home working throughout our company and to those who supply to us.
- To ensure that the presence of home workers in the supply chain will not lead to the relocation of work or cancellation of orders.
- Work with our suppliers for the sustainable improvement of labour conditions with home workers in our supply chains. We will aim to do this by following the guidance set out in the ETI home worker guidelines.

Our suppliers' commitments under this policy

We expect the suppliers we source from to:

- Declare all Homeworkers involved in the manufacturer of our products to TWC CSR Manager
- Adopt a shared policy of acceptance of home-working and commitment to improving home workers' labour conditions where these do not meet those set out in the ETI Base Code (international labour standards); To be sent to TWC CSR Manager
- Communicate this policy to all those in the supply chain below them, including home workers themselves.
- Work with us to identify where home working occurs in the supply chains beneath them.
- Work with us to develop an action plan for improving labour conditions with home workers where these are found to be below those set out in the ETI Base Code.

2.2 Planet – The Environment

We are on a continuous journey of improvement and growth as a business, and we expect our suppliers to commit to coming on this journey with us.

Our environmental expectations for facilities, fabric / materials are outlined below.

Supply Chain Facilities

All TWC suppliers will strive to reduce their environmental impacts through:

- Water consumption
- Effluent generation and water pollution
- Chemical and hazardous substance use
- Waste disposal
- Air pollution
- Resource use and waste generation
- Biodiversity loss
- Renewable energy
- GHG emission reduction
- Carbon management

We expect all suppliers to be on a continuous improvement journey to reduce waste, emissions, and consumption and to avoid environmental & biodiversity damage and to report to TWC CSR Manager annually on your progress.

Materials & Fabrics

Fibres, Fabrics and Skins

TWC suppliers must manage the sustainability impacts of fibre and textile production. As a minimum this must follow relevant environmental legislation. Our preference is to use sustainable fibres and fabrics wherever available and for all textiles to be sustainable by 2025. Exceptions can be made when the changing of fibres could compromise performance or durability. These exceptions are to be discussed and approved by the relevant TWC buying team.

Fibre / Material	Standard	Supplier Responsibilities & Requirements	Additional Requirements
Cotton	Organic GOTS / OCS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s	Adhere to TWC Cotton Sourcing Policy
	Recycled GRS / RCS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s	Adhere to TWC Cotton Sourcing Policy
	REEL Cotton (Cotton Connect)	To work in partnership with TWC and CC and their nominated cotton fields & ginners.	Adhere to TWC Cotton Sourcing Policy
Cellulose	Lenzing TENCEL™ Lyocell / LENZING™ ECOVERO™ / TENCEL™ Modal	Apply a relevant Lenzing Product License to the final product via Lenzing Branding Service. TWC CSR Manager to provide login details.	
Synthetics	Recycled GRS / RCS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter)	

		Share with QA team the final 3 rd party approved Transaction Certificate of product/s	
Denim	Organic GOTS / OCS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s	Adhere to TWC Cotton Sourcing Policy
	Jeanologia Technology	N/A	
Sheep Wool	RWS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s	
	Organic GOTS / OCS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s	
Cashmere	GCS	Obtain GCS Membership at spinner / knitter level & declaration of units involved. To be shared with TWC CSR Manager as well as ABTF.	
	Organic GOTS / OCS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s	
Linen	European Flax Standard	Certification required by Supplier to trade as well as invoice copies for all shipments.	
	Organic GOTS / OCS	Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s	
Down / Feathers	RDS EDFA (Traceability Standard Compliance Certificate) Downpass IDFB	RDS - Share with QA team an in-date 3 rd party approved Scope certificate at Tier 1 level (eg. CMT / final knitter) Share with QA team the final 3 rd party approved Transaction Certificate of product/s EDFA – Down / feather supplier certification Downpass – Tier 1 certification required IDFB - Membership	Live Plucking is strictly prohibited Must be a by-product of the meat industry
Leather	LWG	Minimum requirement to share the LWG tannery bronze, silver or gold certificate with TWC CSR Manager. Additional Supplier level LWG membership favoured.	Must be a by-product of the meat industry

	Leather Standard by Oeko-Tex	Provide Final product certification	Must be a by-product of the meat industry
Sheep Skins	LWG	Minimum requirement to share the LWG tannery bronze, silver or gold certificate with TWC CSR Manager. Additional Supplier level LWG membership favoured.	Must be a by-product of the meat industry
	Leather Standard by Oeko-Tex	Provide Final product certification	Must be a by-product of the meat industry

Cotton Policy

There are serious human rights concerns regarding sourcing cotton from the PRC Xinjiang region and as part of our commitment towards sourcing responsibly, we are banning the use of cotton grown or processed in this region.

We aim to have full visibility of our cotton across our supply chain however we are aware this is a journey and wish to work openly & honestly with our suppliers to achieve this goal due to the complexities of mapping cotton.

- Suppliers must work towards establishing the origin and route to market of any cotton used for TWC products and share with TWC
- The White Company will work in partnership with our suppliers to gain traceability of the supply chain down to the raw materials
- Suppliers must continue to monitor their cotton suppliers closely and will inform us without delay of any changes and/or concerns
- The buying team, Technologist and CSR Manager must be notified by the supplier in the case where origins cannot be verified, and we will work with you to move towards 100% visibility
- As a TWC Supplier you are required to adopt our firm opposition to the use of forced labour in the harvest and processing of cotton

In addition to XUAR we also ban the use of cotton from Uzbekistan & Turkmenistan due to the state forced labour violations. We will not accept cotton from either of these countries.

2.3 Animal Welfare

Any material used in a The White Company product or goods is sourced from animals treated humanely with high animal husbandry compliance and in accordance with the recommendations on animal welfare set out by the OIE (World Organisation for Animal Health) in their Animal Health Codes & the Five Freedoms of Animal Welfare.

Any component of a product, which is derived from an animal, is always a by-product of the meat industry. An animal will never be slaughtered specifically to produce a TWC product or good.

All TWC suppliers are required to take responsibility for the standard of animal welfare within their supply chain and are encouraged, where practical, to implement industry best practice standards. TWC will not accept the mistreatment of animals in the procurement of any animal product.

TWC cosmetic products and ingredients under no circumstance shall be tested on animals.

We do not and ask you to also not knowingly source or sell Goods or Goods containing ingredients from endangered species – this also applies to exotic skins. You must ensure your factories use only farmed sources and/or provide a CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) certificate before we will trade with you. Ingredients or inputs from species listed in a “threatened category” on the International Union for Nature Conservation (IUCN) Red List or on the CITES database are banned from our Goods.

Banned Fabrics & Fibres

We have a strict no-fur and no angora rabbit wool policy. We will not accept any non-food animal products unless they are a by-product of the meat industry.

- "Fur" is defined as - any animal skin or part thereof with hair or fur fibres attached, either in its raw or processed state or the pelt of any animal killed solely for its fur (Does not include sheep skin)
- "Animal" includes, but is not limited to, mink, coyote, sable, fox, muskrat, rabbit, and raccoon dog
- Faux fur means non real animal fur

Any textiles put onto the EU market trimmed with or containing any fur or leather must be labelled with the phrase "contains non-textile parts of animal origin" in line with EU Regulation No 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products. It is essential that customers can identify between real and faux fur contained in a product.

We strongly encourage our suppliers to participate in global sustainability schemes, and to ensure chemical safety across the leather and tanning process. This can be demonstrated through obtaining certification across the previously stated schemes.

Country of Origin of cattle used for leather should be identified to ensure cattle ranching is not causing deforestation and biodiversity loss such as in the Amazon biome. In the Amazon region, cattle ranching is linked with over 80% of deforestation. Our preferred credible third-party scheme on suppliers providing us with leather hides and finished goods is the Leather Working Group.

Where skins, hairs and leathers are supplied to TWC, Suppliers will be required to provide to the QA team as a minimum.

- A list of all leather suppliers which provide leather for TWC product / goods, a signed declaration from your leather supplier/s stating that they do not use leather obtained from live skinning or live boiling and the leather is a by-product of the meat industry,
- List of all countries where leather is sourced from
- A Certificate of Origin for each sourcing country
- Certificate/documented evidence of up-to-date compliance with relevant standards

Chemicals

Chemicals are an integral part to manufacturing the products we use and interact with. While these can offer many benefits, it is crucial these are responsibly used not only to ensure consumer safety but to also protect our environment. Many different chemicals are used for a range of different properties such as fire safety, printing on fabrics and washing product. TWC know the importance of using chemicals responsibly and monitor this as closely as possible across our supply chain.

Our suppliers are legally obliged to ensure they comply with the following legislation as relevant to the products they supply us. These relate to the use of chemicals in consumer products, packaging materials, and production processes. This is intended to protect the environment, as well as our employees and customers from exposure to potentially harmful substances.

- REACH Regulation (EC) No. 1907/2006 & REACH Directive 2006/121/EC
- Classification, Labelling and Packaging Regulation. (CLP) Regulation (European Regulation (EC) No 1272/2008)
- RoHS (Restriction of Hazardous Substances) Directive (EU) 2015/863

Suppliers are required to complete the TWC chemicals declaration which also covers EU and US obligations including REACH, the Toxic Substances Control Act and Proposition 65.

Please refer to the TWC REACH Policy for full details.

Microbeads

TWC is committed to not using solid plastic microbeads and microplastics in our personal care products. No own-brand products are permitted to be manufactured with such microbeads. Microbeads are currently defined as “Solid micro plastics less than 5 mm in all directions which are designed to go down the drain or go down the drain in practice”.

Please refer to the TWC Fragrance Policy for full details.

Waste Electrical and Electronic Equipment (WEEE)

TWC are committed to ensuring that our electronic products comply with the WEEE Directive. The WEEE Directive sets out measures for collecting WEEE for recovery, recycling and re-use. Under this legislation, it is also the responsibility of the retailer to meet a “Consumer Information Obligation”. This obliges retailers to inform customers as to the availability of WEEE collection facilities throughout the UK and assist in developing their knowledge of recycling issues surrounding WEEE. To assist customers in remembering that electronic goods can be recycled and therefore should not be placed in the general waste, all products of this type are to be marked by the Supplier with a crossed out wheeled bin symbol.

In accordance with RoHS – Restriction of Hazardous Substances, TWC suppliers are not permitted to place any new electrical equipment on to the EU market containing any of the following exceeding the set maximum concentration values:

- Cadmium
- Chromium
- Lead
- Mercury
- Polybrominated Biphenyls ('PBB')
- Polybrominated Diphenyl Ethers ('PBDE')

For the purpose of the RoHS Regulations, maximum concentration values of up to 0.1% by weight homogenous materials for lead, mercury, Hexavalent chromium, PBB and PBDE, and of up to 0.01% by weight in homogenous materials for cadmium will be permitted in the manufacture of new electrical equipment.

Timber and Paper

Year on year, as the result of illegal or badly managed logging and land conversion for agriculture - including the cultivation of soy, palm oil and cattle, the world's forests are depleting at a rapid rate. Timber demand is expected to triple in the next thirty years making it a more valuable commodity.

TWC understand how vital our forests are to our environment and products, and therefore factories supplying us with timber product must ensure compliance with the UK Timber Regulations, CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) and EU Wildlife Trade Regulations. Under the UKTR, placing illegally harvested timber and products derived from such timber on the EU market is prohibited.

We encourage all suppliers of timber or pulp products & goods to source responsibly from FSC sources as a preference. The FSC certification must be shared with the relevant technologist.

Please refer to the TWC Timber Sourcing Policy for more information on our requirements.

Precious Stones, Metals and Minerals

TWC suppliers shall ensure that you and your factories manage the sustainability impacts of mining for stones, metals and minerals particularly with the inclusion of marble. As a minimum this must be in compliance with relevant environmental and labour legislation to reduce both environmental and ethical impact.

Factories must use open pit mining and there is evidence of sufficient environmental management during the production of stones, metals or minerals. Open pit mining, mercury used in artisanal mining and certain sourcing methods for tin cause pollution and health risks.

Our preference is the use of credible third-party certified schemes. Some examples are:

- Responsible Jewellery Council
- Alliance for Responsible Mining

2.4 Packaging

We are working towards eliminating all non-essential packaging, where not possible these are being replaced less environmentally impactful options.

Item	TWC Requirements	Source	Supplier Requirements & Responsibilities	Additional Requirements
Transit Polybag	Min. 30% recycled LDEP content	Self-Source or via Weavable	Provide GRS / RCS certificate to technologist confirming recycled content	TWC Artwork to be used
Bedding Display Bags	Min. 30% recycled PE content	Self-Source or via Mainetti	Provide GRS / RCS certificate to technologist confirming recycled content	
Swing Tags	FSC Certified	Self-Source or via Weavable	Provide FSC certificate	TWC Artwork to be used
Inner Labels	Min. 50% recycled content	Self-Source or via Weavable	Provide GRS / RCS certificate to technologist confirming recycled content	TWC Artwork to be used
Card	FSC Certified	Self-Source	FSC certificate	
Kimbles	100% recycled 60-65mm	Self-Source or via Weavable	Provide GRS / RCS certificate to technologist confirming recycled content	
Grosgrain Ribbon	100% recycled	Self-Source or via Weavable	Provide GRS / RCS certificate to technologist	

			confirming recycled content	
Inner / Outer Cartons	100% recycled / FSC	Self-Source or via Weavable	Provide GRS / RCS / FSC certificate to technologist confirming recycled content	
Tissue Paper	100% recycled / FSC	Self-source	Provide GRS / RCS / FSC certificate to technologist confirming recycled content	
Red & Gold Seal Sample Tags	Recycled GRS	Weavable	Provide GRS certificate to technologist confirming recycled content	

All products should be designed and packaged in way which conforms to The Packaging (Essential Requirements) Regulations 2015 (SI 2015/1640).

The White Company Factory Set Up / Onboarding

Initially, Suppliers and any Agents are required to self-evaluate and establish clearly for themselves, detailed knowledge of their factory's practices. Please complete The White Company Supplier/Factory Assessment forms requested. TWC will require copies for every factory/ unit supplying goods or services to The White Company.

Suppliers and all sites of production producing The White Company goods must complete our Factory Assessment Form and keep records to show compliance for past and current production. Photographs of each factory must be provided, and the factory assessment form kept up to date with any major changes e.g., workforce numbers.

(1) TWC Clothing, Nightwear, Accessories and Childrenswear (LWC/ LWH) - The White Company QA (Quality Assurance) Factory set up documents -

Suppliers/Factories must complete the following sections that will be sent to Suppliers by the TWC QA Technical Team.

- Main Technical Assessment questionnaire – self assessment
- Apparel & Home Textile – self assessment
- Reach, Prop 65 TSCA declaration Doc - to be signed
(In addition, a Technical Profile Guidance will be submitted to support these documents)
- Responsible down sourcing declaration - for feather and down suppliers only - to be completed and returned with supporting documentation *(if applicable)*
- Timber sourcing policy – for wood and paper suppliers only - to be completed and returned with supporting documentation *(if applicable)*

Suppliers/Factories will receive the below additional QA manuals and will need to comply to specification within.

- Testing manual – for specific product categories
- Product manual – for specific product categories

(2) TWC HOME (LWH) - The White Company QA (Quality Assurance) Factory set up documents

Suppliers/Factories must complete the following sections that will be sent to Suppliers by the TWC Home QA Technical Team.

- Main Technical Assessment questionnaire – self assessment
- An additional questionnaire relevant to the materials and/or substrates used in production – self assessment
- Reach, Prop 65 TSCA declaration Doc - to be signed
- Timber sourcing policy – for wood and paper suppliers only - to be completed and returned with supporting documentation
- Responsible down sourcing declaration - for feather and down suppliers only - to be completed and returned with supporting documentation
- Fragrance Policy - for home fragrance and cosmetics suppliers only - to be completed and returned with supporting documentation

(In addition, a Technical Profile Guidance will be submitted to support these documents)

Suppliers/Factories will receive the below additional manuals and will need to comply to specification within.

- Testing manual – for specific product categories
- Defect classification list – for specific product categories or substrates
- Product manual – for specific product categories

Ethical CSR onboarding requirements: The White Company each factory is required to complete an ethical self-assessment form and a recent 3rd party, semi-announced social audit (preferably a SMETA) for review for the Tier 1 site manufacturing our product. All sub-contractors, homeworkers, packers supporting the manufacture of these products must also be declared, self-assessed and reviewed.

Supplier Set Up Forms: Alongside the QA factory assessment forms and Ethical factory onboarding requirements, TWC will also need Suppliers to complete a (i) Supplier/vendor profile and (ii) Supplier Finance set up form (iii) An AEOC Form and a Supplier Manual Acknowledgement Form which will enable us to, sign off and set up Suppliers on the TWC System. The White Company will be unable to onboard any suppliers/factories for business without these completed documents.

Agents: In the event that The White Company agree to onboard a new Agent – there will be individual agreement paperwork and the Agent will receive required documents as part of the onboarding process. Meanwhile, all suppliers and factories that Agents onboard with The White Company will need to meet the standard requirements above.