

THE WHITE COMPANY  
LONDON

Mindfully sourced

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2024



## Our mission statement

Mindful consumption is at the heart of our business – buying better and buying less. Creating timeless, long-lasting and responsibly sourced products designed for today, tomorrow, forever. We are committed to building a sustainable legacy that will enable a brighter future for our people and our planet.

## The White Company's Ethics & Sustainability pillars

PEOPLE	PLANET	PRODUCTS
We aim to promote and respect the human rights and labour standards of everyone in our supply chain.	We aim to decarbonise our operations and supply chains while protecting, conserving and restoring nature, as well as addressing waste.	We aim to craft our products with as little impact on people and the planet, and to contribute towards a more circular economy.

## Our commitment

Our commitment to mindfully sourced products begins with the workers producing our goods. We have been members of the **Ethical Trading Initiative (ETI)** for over a decade, and have adopted the **ETI Base Code** in full, which is based on the standards set by the **International Labour Organisation (ILO)**.

The ETI is an alliance of companies, trade unions and Non-Governmental Organisations (NGOs) that promotes respect for workers' rights around the world. As members, we work with the ETI to improve workers' rights by implementing the Base Code across our supply chain.

The Base Code applies to all our supply partners and factories – including subcontractors, homeworkers and packers – as well as the extended supply chain of our products.

As a minimum, all factories – including subcontractors, homeworkers and packers producing for The White Company – must comply with and be able to demonstrate compliance with The ETI Base Code. It is an important responsibility of suppliers to make sure the Base Code is fully communicated down their own supply chain.

Our supplier partners agree to our **Code of conduct** which includes the ETI Base Code, as well as our expectations on protecting workers' rights, maintaining a transparent supply chain and the relationship between The White Company and its suppliers.

## Collaborations

Our ETI membership allows us to collaborate with our peers in the industry, global trade unions, and NGOs to improve the working conditions throughout supply chains, collectively. We know that we cannot improve workers' rights all on our own and that collaboration is key to driving change.

In addition to the ETI, we are also members of a peer-to-peer working group focussed on the changes and challenges we face within our industry.

We have always worked with NGOs and continue to attend key roundtable events in association with both **Anti-Slavery International** and **Action Aid**.

We believe in supporting change and we are signatories of a joint statement calling on the UK government to adopt a mandatory Human Rights Due Diligence (mHREDD) regulation.

Our suppliers are our key collaborators, and we work in partnership with them to develop our products and to manage our supply chain. Our Top 20 suppliers (which together deliver 80% of our business) are scored annually across various areas: profit, product, QA testing, quality, delivery, communication, ethicals, and environmental impact. If a supplier receives a low score on either ethical or environmental parameters, we have a SWOT analysis and action plan in place to address the issues. We encourage our suppliers to be constantly improving.





## Governance structure



Reporting into the Chief People & Retail Officer, our in-house Ethics, Sustainability & Compliance team are responsible for managing our approach to respecting human rights and labour standards within our supply chain. This includes, but is not limited to, our risk assessment and due diligence process, maintaining our third-party audit programme, and ensuring new suppliers share our commitment to ethical trade.

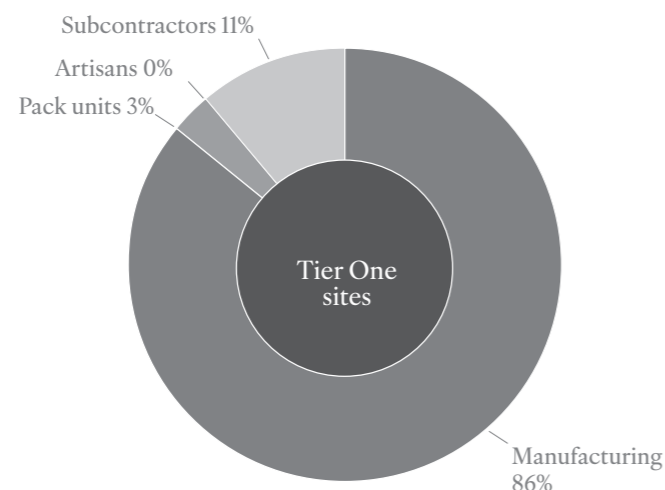
Within the team, each member is responsible for their area of expertise which covers ethics, sustainability and regulatory compliance.

Reporting into our Operating Board, Senior Leadership and Product teams on a regular basis, the team provide key insights via a monthly risk pack, which identifies specific supplier and country risks, as well as product- and industry-specific risks.

Although designed and developed by the Ethics & Sustainability team, the Chief People & Retail Officer and CEO are responsible for signing off the Ethics & Sustainability strategy.

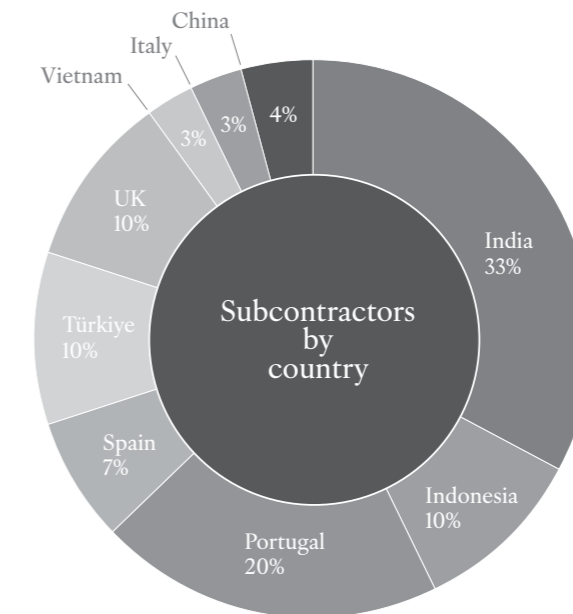
## Supply chain

The White Company offers a diverse range of products from 267 factories\*. This creates a complex supply chain, so we do not have a 'one size fits all' approach to assessing factories. We understand these complexities and encourage the use of artisans, subcontractors, and homeworkers in the making of our unique products. Each year we publish our Tier One suppliers list on Open Supply Hub, which can be found [here](#).



While most of our Tier One sites fall into 'standard' manufacturing units or factories, there are also smaller, artisan-size units which are chosen for their craft skills. Due to the size of these units, we do not expect them to complete a third-party annual audit but, instead, require they complete an annual ethical self-assessment covering all areas of the ETI Base Code.

There are some countries that rely on supporting units to manufacture our product, and therefore use subcontractors. These units are also counted as Tier One sites as they manufacture or assemble our final product. Currently, we work with 30 such units. These sites, depending on their size, will either have a third-party audit, or complete a self-assessment.



Across our range of home products, we also rely on the unique handcrafting skills of homeworkers specialised in techniques, such as batik, seagrass weaving, metal work and hand-embroidery. Homeworkers are workers who have the flexibility to work from home, usually due to other domestic obligations. We currently work with 26 homeworker groups, a decrease of eight since last year. We have developed a homeworker-specific assessment framework for these groups covering health and safety, wages, and child-labour indicators. Like our assessment for our Tier One sites, this is also carried out and reviewed annually.

Country	Number of groups	Number of workers	Product ranges
Vietnam	18	680	Embroidered bedlinen, rattan and seagrass Home & Dining products, cushions
Indonesia	4	18	Ceramics
India	2	23	Beaded placemats and coasters
Bangladesh	2	300	Jute placemats
<b>TOTAL</b>	<b>26</b>	<b>1,021</b>	

\*Of our 267 factories, we submitted 258 to Open Supply Hub this year. This is due to a longstanding confidentiality clause with one supplier who owns a network of nine factories based in the Guangdong, Jiangxi and Zhejiang provinces of China. We recognise the vital role transparency plays in identifying risks, as well as supporting our ability to remedy and prevent further occurrences, so we are actively working with this supplier to overcome this issue, and be able to include those nine sites into our Open Supply Hub submission next year.

## The White Company's policy on 'home working'

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

Historically, the lack of visibility of homeworkers in supply chains makes them a vulnerable group.

## Our position

### Acceptance of home working

The White Company takes an open and positive position towards home working. We believe that skilled homeworkers are very important to the hand-crafted, quality nature of many of our products as homeworkers often produce specialist components which cannot be made by machinery, or can produce small quantities of intricate or high-quality items.

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

### Our commitment to homeworkers

We acknowledge that improving labour conditions for homeworkers is a complex issue. Under this home-working policy, we commit to:

- Communicate our position on home working throughout our company and to those who supply to us.
- Ensure that the presence of homeworkers in the supply chain doesn't lead to the relocation of work, or cancellation of orders.
- Work with our suppliers for the sustainable improvement of labour conditions for the homeworkers in our supply chain by following the guidance set out in the ETI homeworkers guidelines.

### Our suppliers' commitment to homeworkers

We expect the suppliers we source from to:

- Declare all homeworkers involved in the manufacturing of our products.
- Adopt a shared policy of acceptance of home working and a commitment to improving homeworkers' labour conditions.
- Communicate this policy to all those in the supply chain below them, including the homeworkers themselves.
- Work with us to identify where home working occurs below them in the supply chain.
- Work with us to develop an action plan for improving labour conditions for homeworkers where these conditions are found to be non-compliant with the requirement of the ETI Base Code.







## Modern slavery

All parties involved in the production of The White Company products must comply with The White Company's **Code of conduct**, respect international human rights and comply with any and all applicable laws relating to slavery and human trafficking, including the Modern Slavery Act 2015.

The White Company is committed to ensuring there are no forms of modern slavery in our supply chain or business operations, and we expect all of our suppliers 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.

## Human rights due diligence

### Monitoring and mitigation

All of our suppliers must sign our **Code of conduct** which covers our workers' rights expectations across our supply chain. This includes both on-going annual requirements, as well as the onboarding process.

In addition to signing our Code of conduct, our suppliers must provide us with a third-party social audit and an ethical self-assessment. These are reviewed in conjunction with each other and fed back to the supplier. It is quite normal for a factory to encounter non-compliances, and we work with such suppliers on a timeline to put corrective actions in place. We source a diverse range of products from 19 countries, and we review each site based on geography and industry.

Our business is split into three categories – Home, Fashion, and Little White Company – each with its own supply chains, and we engage with their separate commercial Buying and Quality Assurance teams to keep them up to date with their suppliers. In the event where a factory has a severe issue, we work with our Commercial team and the supply partner to discuss the root causes, the responsible person(s), additional training recommended along with timelines for closure of issues. The factory will then be monitored over time to ensure the issues are not repeated.

We pay particular attention to worker-voice data, ensuring that all sites have a minimum of one workers' committee with elected representatives. Please see below for data on workers' representation across our Tier One sites. We understand that strong grievance mechanisms and worker-voice data enable non-compliances to be resolved without our intervention.

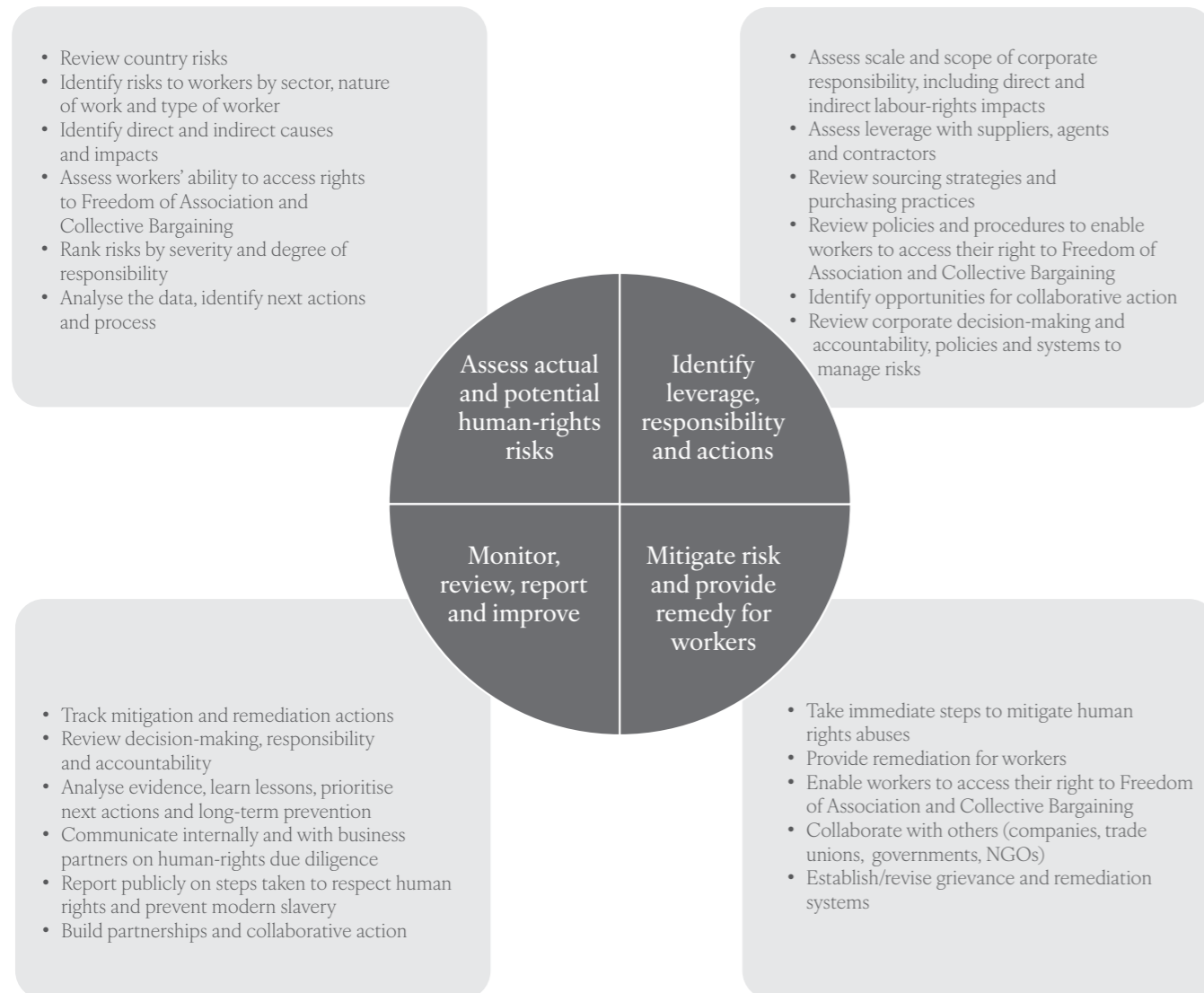
In addition to auditing our factories, we also use a variety of frameworks and resources as part of our human-rights due diligence. We believe that audits just touch the surface of understanding risks in our supply chain, so we combine these results with country-specific risk assessments.

As an ETI member, we use their **Human Rights Due Diligence framework**, (which is in line with the **United Nations' Guiding Principles on Business and Human Rights**) to help us identify and address actual and potential risks to human rights in relation to our purchases as a business. The resources we use to grade risks to workers include the annual **International Trade Union Confederation Global Rights Index** – assessing worker-voice and overall rights – and the annual **USA Trafficking in Persons Report** – reporting on modern slavery and human rights risks by country.

We combine these results with data on the most vulnerable workers in our supply chain and this directs our ethical strategy's focus.



## ETI Human Rights Due Diligence Framework



By using this framework, we have identified the key risks in our top-five sourcing countries based on country-specific and overall-business risks. This allows us to focus our attention on these key countries and higher risk areas.

### Country priorities and salient risks

Country	China	Türkiye	India	UK	Portugal
<b>Salient risks identified</b>	<ul style="list-style-type: none"> <li>• Forced labour</li> <li>• Lack of worker voice</li> <li>• Local migrants</li> </ul>	<ul style="list-style-type: none"> <li>• International migrants</li> <li>• Informal workers</li> </ul>	<ul style="list-style-type: none"> <li>• Local migrants</li> <li>• Discrimination against women</li> <li>• Lack of worker voice</li> <li>• Informal workers</li> </ul>	<ul style="list-style-type: none"> <li>• Local migrants</li> <li>• Forced labour</li> </ul>	<ul style="list-style-type: none"> <li>• International migrants</li> <li>• Informal workers</li> </ul>







## China

We have been aware of the risk of forced labour in our Chinese supply chain for a number of years. We have been improving our human rights due diligence in China since 2020 by engaging more with our suppliers, gathering data on migrants' origins and implementing a cotton policy.

Workers' rights due diligence in China is challenging, and working together with our ETI peers and industry experts is key in identifying risks in our supply chain.

Local migration is a widespread practice in China and has been the industry's tradition for decades. Manufacturing sites in China are predominantly located along the East coast, near ports, as these provinces are where most exporting industries are based. However, a large number of workers come from less prosperous provinces away from the coast, and are recruited to work in factories. These local migrants often work in factories for a number of years, then return to their original provinces.

Although we know that these workers are Chinese, too, and not recruited from abroad, we still put them into the category of 'vulnerable workers' as their rights can be lesser than those of the local workforce.

## Türkiye

We haven't seen an increase in international migrants in Türkiye this year. The numbers have remained steady and no new nationalities have entered our supply chain there.

As there's been a steady influx of migrants into Türkiye since 2017, due to conflict in neighbouring regions, we have decided to keep 'migration' as a salient issue within our supply chain in the country. We believe it is an area that we need to maintain our focus on, and will continue to monitor.

The manufacturing industry in Türkiye relies on subcontractors to support processes, such as sewing and ironing. We continue to ask all our Tier One factories to declare supporting units and the workers they employ there, as almost half of the sites in Türkiye use subcontractors (12 sites, plus five subcontractors).

## India

India relies heavily on local migrants, too. Workers are recruited from across the country to work in factories in industrial areas. This can often be combined with agricultural work in harvesting seasons and so workers can be moving between industries throughout the year to earn an income. This often means that migrant workers have short-term contracts and can find themselves having reduced rights compared to their peers with long-term contracts.

The visibility of migration in India is considerably reduced compared to China. Audits often don't identify migrants' numbers, just temporary workers, and so there is work to do in identifying how many migrant workers there are in our supply chain in India, as well as their origins.

The majority of our factories in India are based in the north, around Delhi and Moradabad. This part of the country has a high volume of male workers, both in the production of hard goods and textiles. We often find that over 90% of the workers are male, which makes the few women workers more vulnerable as employees.

The manufacturers in India, particularly in Moradabad, also rely heavily on the use of subcontractors and homeworkers as the products made in this area often require artisans and craftspeople to finish the manufacturing process. Informal workers can often be forgotten in the due diligence process.



## United Kingdom

Our UK supply chain is focused on home hard goods and fragrance. We use 14 sites in the UK in which the recruitment of international migrants is very high. In some cases, we can find that almost 80% of the workers are international migrants.

The labour recruitment process in the UK can be challenging and high risk, as there have been many cases of modern slavery via the use of agencies. We make sure we actively review the recruitment process in our UK sites, and check the [Gangmasters & Labour Abuse Authority website](#) to ensure the labour providers we use have a valid GLAA license.

## Portugal

The majority of the manufacturers we use in Portugal are for bedding and textiles products. Portugal is generally low-risk but, as our second-highest sourcing country, we feel a responsibility to focus our attention on the workers there.

The workforce in Portugal is predominantly local, with little use of migrant labour. However, we have seen an increase in recruitment of labour via agencies and from other countries, especially in southern Portugal. This is an area we will explore more in 2025.

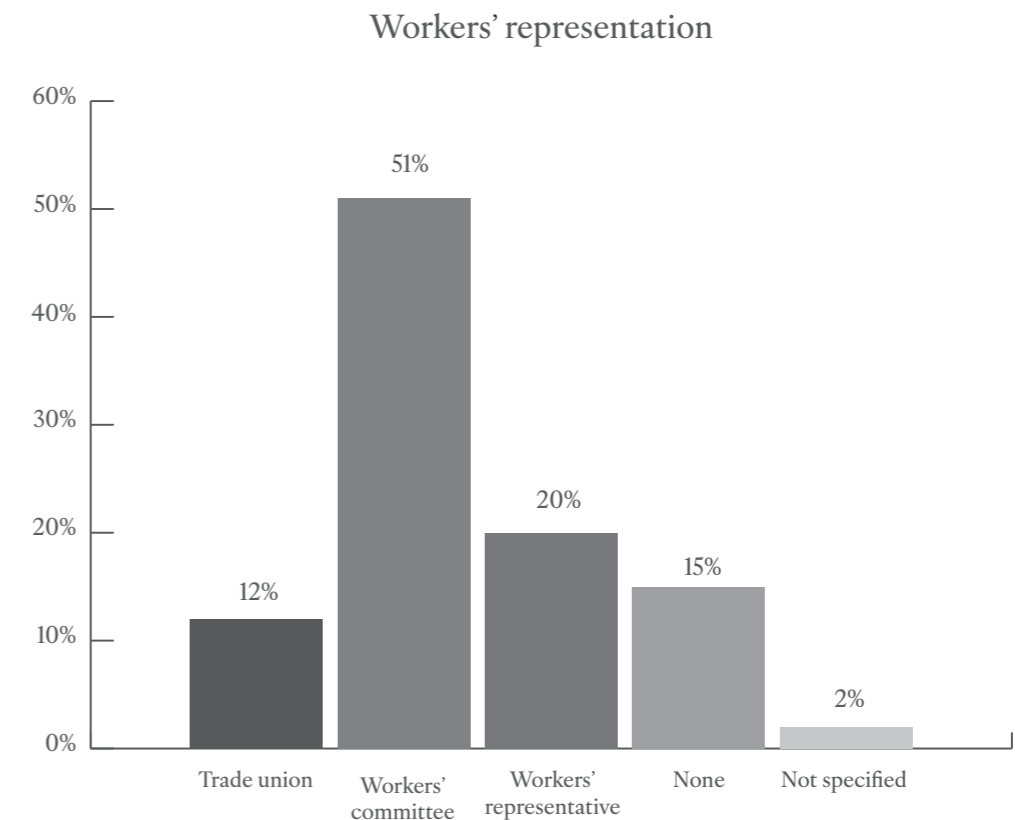


## Worker voice and Freedom of Association

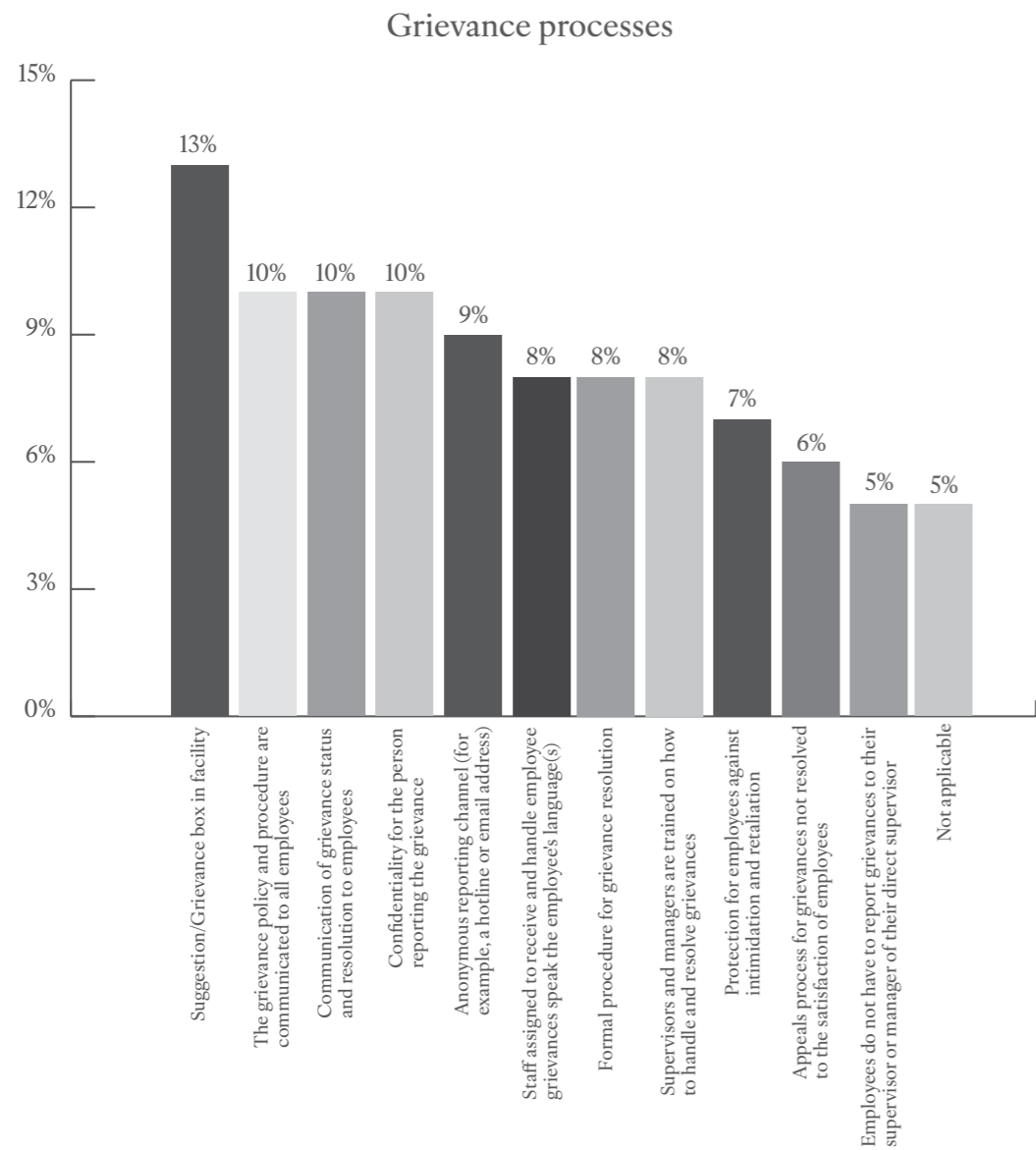
A key clause in the ETI Base Code is 'Freedom of Association (FoA) and Collective Bargaining'. This means that all workers have the right to join a union, or to bargain collectively for their rights unless restricted by law. In this case, the employees have the right to develop parallel means for independent and free association and bargaining, such as a workers' committee with freely elected representatives.

FoA is key in improving the rights of workers as it allows them to have a voice and express concerns over everything from health and safety to fair wages and harassment. Empowering workers to use their voice and implementing grievance mechanisms and channels allows them to voice their concerns in all areas, and consequently improves all nine ETI Base Code clauses.

This is why FoA is a key area in all manufacturing sites and one we must focus on in order to improve all workers' rights. Below is a table of data gathered from our Tier One sites: it shows that 83% of the factories have a form of workers' representation. This is a positive start – however, it doesn't tell us the effectiveness of these channels.



This year we delved further into this data, focusing on our Top 20 suppliers, covering 80% of our Tier One sites. We wanted to explore the grievance channels in these factories, their understanding of the importance of worker voice, and find out where we need to focus our attention.



From this additional data we can see that there is work to be done in this area. All grievance-process selections remain under 15% and should be closer to 100%. Although the number of suppliers who answered N/A decreased from 8% to 5% this year, it is clear the importance of worker voice is still not fully understood.

## Vulnerable workers in the supply chain

In addition to identifying and focusing on the salient issues in our Top Five countries, we have also identified the most vulnerable people in these countries. These people, due to their social status, commonly enjoy fewer workers' rights than the rest of the workforce.

The three groups identified are migrant workers (both local and international), informal workers (e.g. subcontractors and homeworkers), and women.

Country	China	Türkiye	India	UK	Portugal
<b>Vulnerable workers</b>	<ul style="list-style-type: none"> <li>Local migrants</li> <li>Women</li> </ul>	<ul style="list-style-type: none"> <li>International migrants</li> <li>Informal workers</li> <li>Women</li> </ul>	<ul style="list-style-type: none"> <li>Local migrants</li> <li>Informal workers</li> <li>Women</li> </ul>	<ul style="list-style-type: none"> <li>International migrants</li> <li>Women</li> <li>Informal workers</li> </ul>	<ul style="list-style-type: none"> <li>International migrants</li> <li>Informal workers</li> </ul>





## Migrant workers

Migrant workers are commonly employed in supply chains where there is a lack of local labour, high levels of immigration due to conflict, or established labour routes via labour agencies.

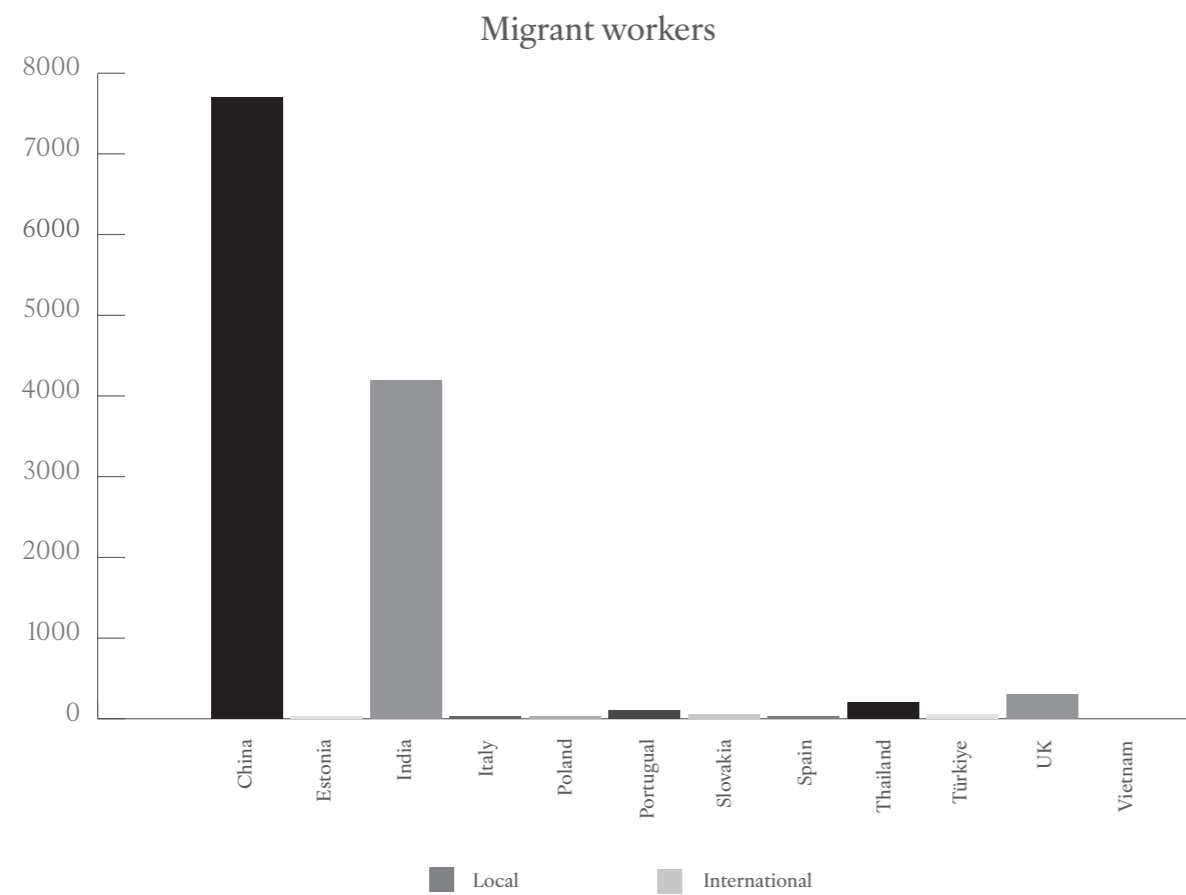
This can often mean that migrant workers are provided little social protection and experience inequalities in the labour market, which can then lead to discrimination, exploitation, forced labour, and even human trafficking.

Migrant workers can be categorised as either local or international migrants.

Local migrants are those engaged in labour for which they have travelled to another region of their national state specifically for employment. In our supply chain, we see this in China and India.

International migrants are those engaged in labour activities for which they have travelled to or been displaced to a foreign country or territory for employment and/or refuge. In our supply chain we see this predominantly in the UK, Southern Portugal, Mauritius and Thailand.

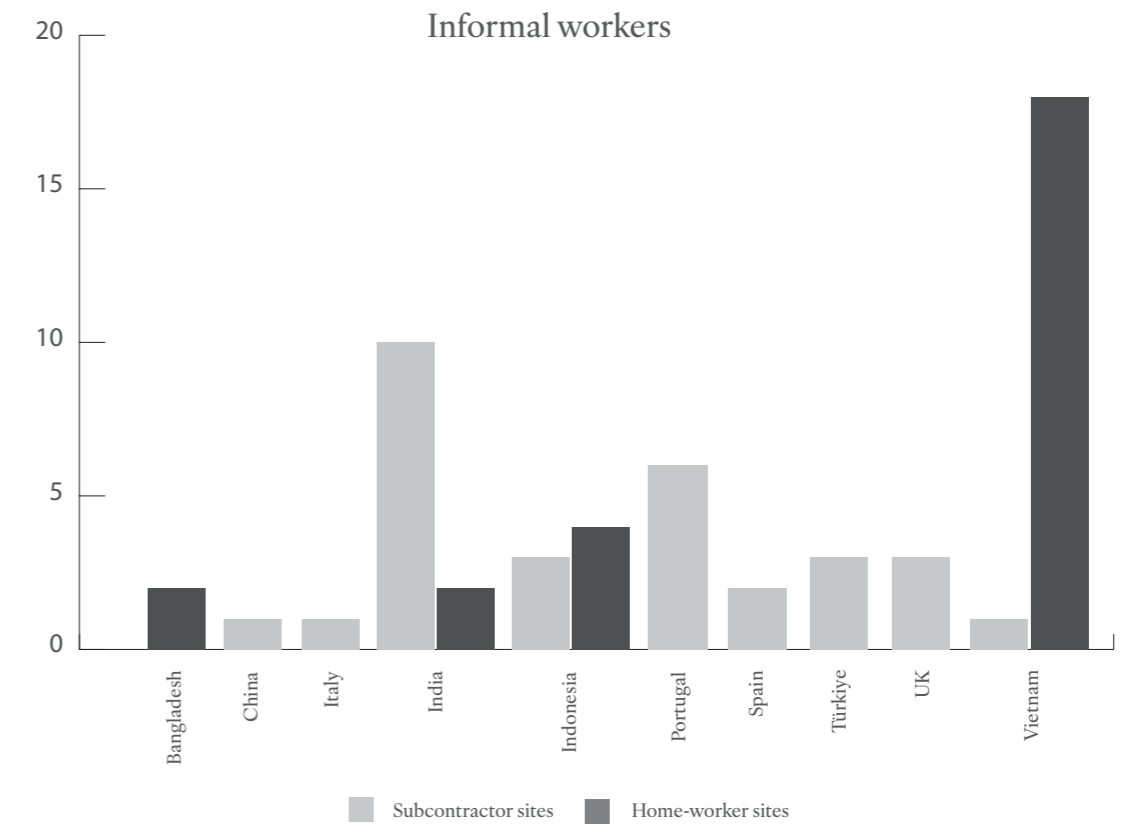
We have identified 12,040 local migrants and 1,109 international migrants in Tier One.



## Informal workers

Informal workers are those employees who are informally employed. In the case of our supply chain, they can be subcontractors or homeworkers.

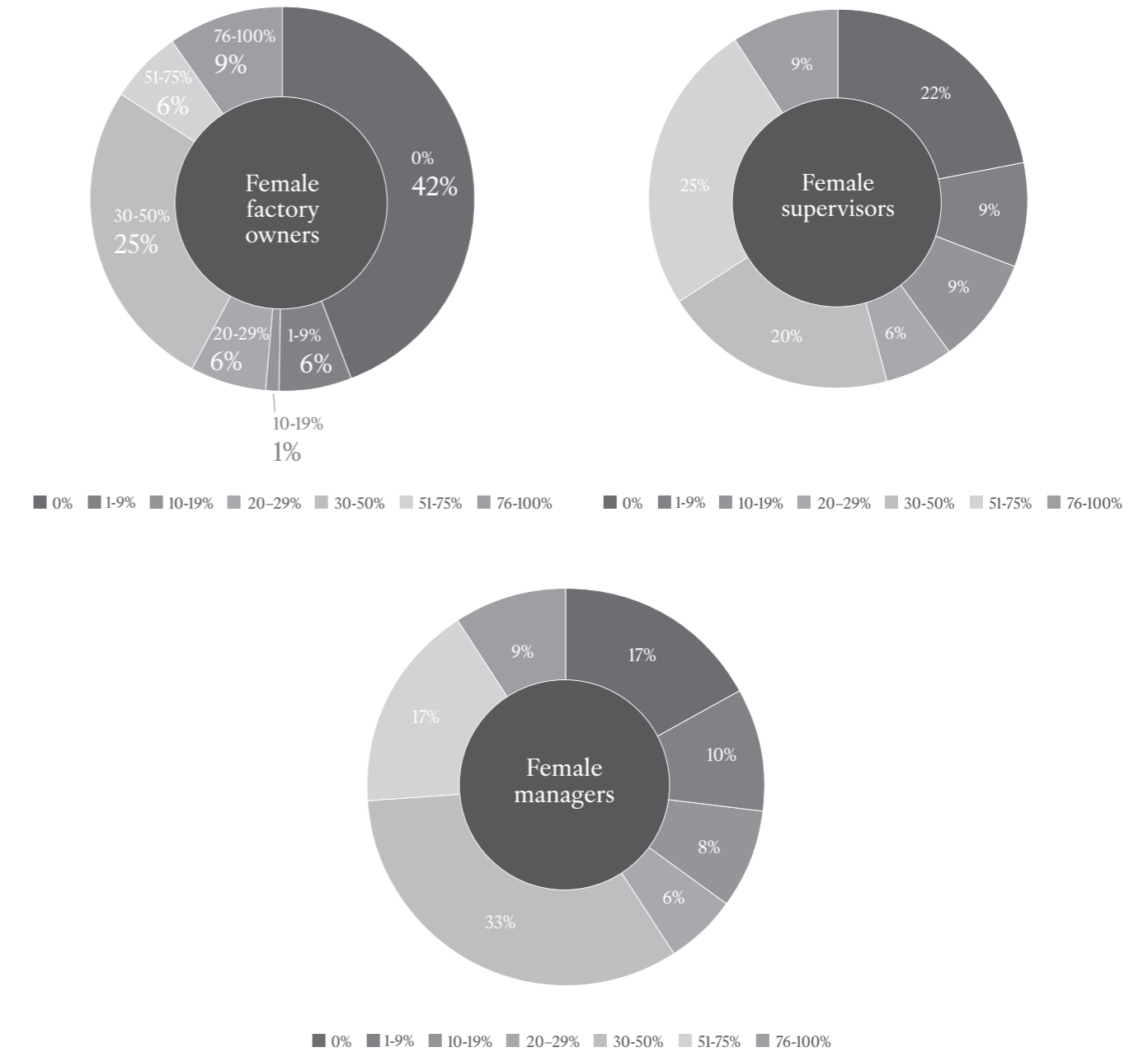
These employees are not directly employed by a factory and so do not always have access to the same rights as their formally employed counterparts. We have identified 56 informal working sites in our supply chain.





## Women

Women make up nearly half of our supply chain and can often be discriminated against as employees. This can cause them to have reduced rights, a hidden voice and in some cases fear of harassment or abuse. We have identified 30,825 women currently employed in Tier One.



The above data shows there is a lack of female management and ownership at the factories we use.

There are complexities when analysing this data as it is based on our Top 20 suppliers, who produce everything from tables to cashmere knitwear across various countries, from India to Lithuania.

This year, we will continue to delve further into the data to find out if there is more of a lack of female leadership in specific industries and/or countries.



## Steps taken in 2024

### Better with B Corp™



In February 2024 we became B Corp™ certified – a significant milestone that reaffirms our commitment to putting our people and the planet first. Our journey towards B Corp™ certification provided us with an opportunity to reflect and reassess every part of our business. In doing so, we have strengthened our foundations and improved our ways of working. The rigorous assessment process we went through measures companies on their internal processes, accountability and transparency from employee benefits and charitable giving to supply chain practices and environmental stewardship. The certification aligns with our commitment to continuous improvement as well, with assessments taking place every three years, leading to long-term resiliency.

### Strengthening our foundations

In 2024, we focused predominately on strengthening our foundations. We experienced changes to our team structure, which resulted in a shift in priorities. Although our objective for the year was initially set to analysing data on migrant workers, we pivoted and took the opportunity to conduct a gap analysis of our own Ethics & Sustainability programme, to ensure we are robust and in a position to support and elevate workers' rights within our supply chain.

As a result, we have introduced a monthly supplier-risk pack detailing high-risk factories, which we send to our Senior Leadership, Operating Board and CEO. To aid the close monitoring of workers' rights, we have introduced a critical remediation process, whereby our Ethics team work very closely with any high-risk suppliers to ensure issues are addressed fully, whilst encouraging suppliers to understand the root cause. The Commercial team is included in the remediation process for support, as well, and if the supplier fails to engage and address the critical issues we identified, the Head of the department is notified for further support. Failure to remediate beyond this point means the issues are discussed with the Director of department, meaning the Board is informed, including the CEO.

This year, we have also introduced training and working groups for all Product teams to ensure they have a full understanding of our Ethics & Sustainability programme, while providing them with the tools and support they need.

### Worker programmes

We are now in our third year working with CottonConnect, an organisation dedicated to the improvement of supply chains for the global cotton industry to ensure a fairer and more sustainable trade. They deliver training and know-how on sustainable farming methods to smallholder cotton farmers in Samul and Damietta, Egypt, helping them enhance the yield of their crop (and therefore their income) and reduce their impact on the environment. We're working with Cotton Connect through their REEL Cotton Programme which allows us to source fully traceable cotton. In 2024, we launched our first REEL Cotton bedlinen within in our Savoy range.

### Transparency

Last year, we published the details of our partnership with Supply Shift, a mapping and transparency portal. We then launched Phase One of our transparency commitment, with a goal to fully map our supply chain up to Tier Four.

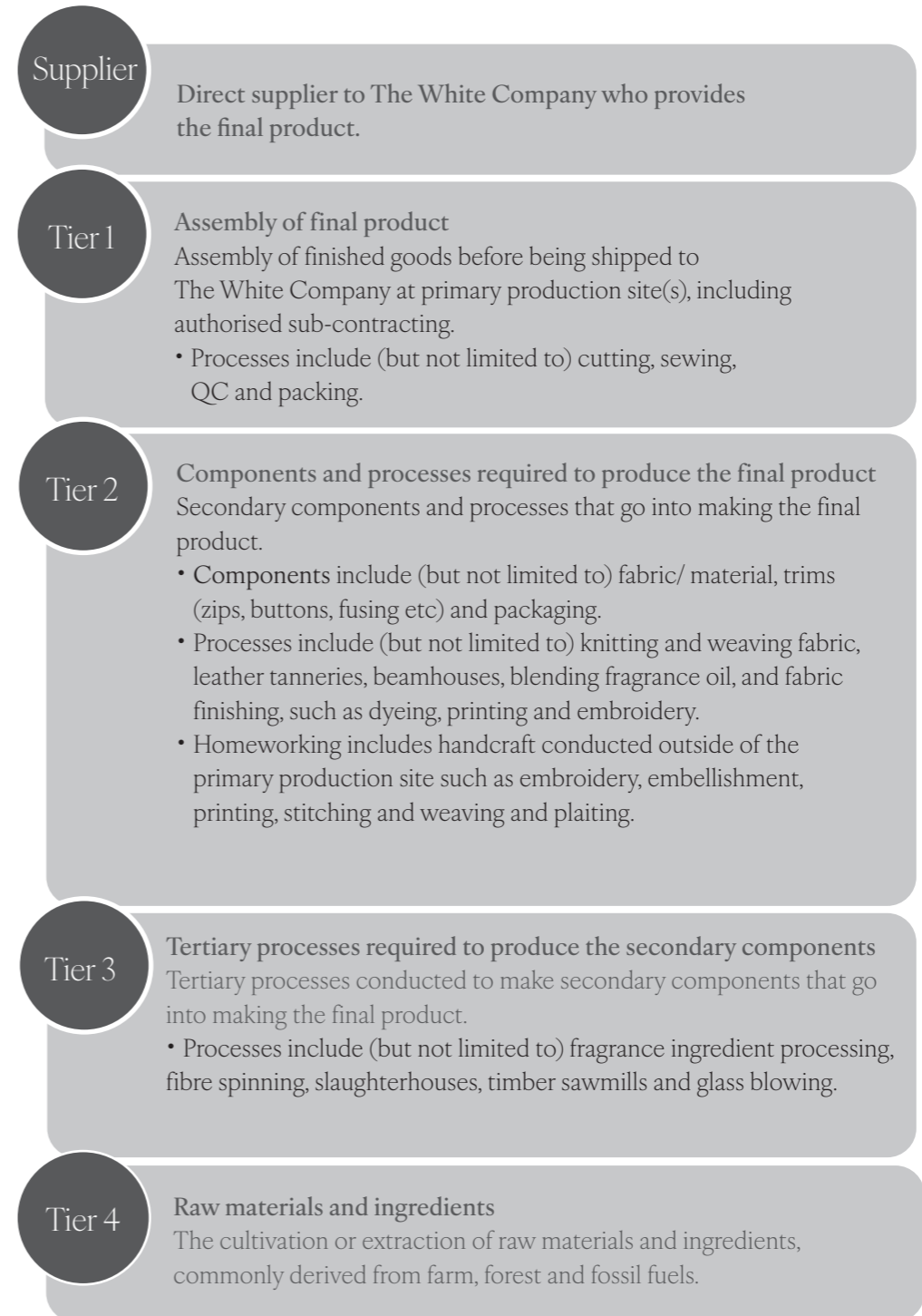
We also assessed our Top 20 highest-value suppliers through a series of ethical/social and environmental questions at both supplier and factory level, with a focus on collecting disaggregated data on workers' representation including the most vulnerable workers (informal workers, migrants and women).

The data collected covers key countries such as China, India, Türkiye, UK, Portugal and Vietnam, as well as smaller sourcing countries such as Lithuania, Madagascar and Poland.

In November 2024 we entered Phase Two of this project, looking at Tier Two of our supply chain and beyond.

We have developed a comprehensive webinar and support pack for our suppliers to ensure they have a full understanding as to why we are asking for these data.

We are still in the process of receiving data from suppliers.



## Next steps

### Purchasing practices

We recognise that a brand's commercial decisions – from last-minute design changes to inaccurate forecasting – can vastly impact working conditions within its supply chain. This can lead to heightened risks for workers, such as excessive working hours, lower wages and poor occupational health and safety. As a result, in 2025 we aim to collaborate with our suppliers to understand our own impact on the supply chain, working towards a longer-term goal of embedding responsible purchasing practices across the business.

### Increase training and engagement with suppliers and internal teams on risks

As a continuation of our aim to strengthen our foundations, we recognise the need for continued training and engagement with our suppliers, our internal Product teams and our Store teams. In addition to a critical remediation plan, we want to ensure we are engaging our suppliers fully on *why* they may have recurring issues in their factory, and provide them with the necessary support to ensure they can remedy those issues.

We want to ensure our Product teams all have a full understanding of why certain issues become salient, and what we can do collectively as a brand to implement positive change wherever possible.

We aim to equip our internal teams with the support and tools they need to better understand supply-chain risks.

### Freedom of Association

Social dialogue and collective bargaining in the workplace are essential for building trust and creating a safe environment for workers to speak freely. Although 83% of our Tier One sites have a form of worker representation, we do not have a clear understanding of whether these committees function correctly and fairly. Therefore, we plan to engage directly with the factories to discuss the importance of worker representation and make sure existing committees are working correctly.

