



WH Smith PLC Modern Slavery Statement 2024/2025

Introduction

This is WH Smith PLC's (WHSmith)'s tenth annual statement published in accordance with the Modern Slavery Act 2015. This statement is also published in accordance with the Australian Modern Slavery Act 2018, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 and the California Transparency in Supply Chains Act 2010. This statement outlines the steps we have taken to prevent modern slavery in our operations and supply chain for the financial year 1st September - 31 August 2025.

Modern slavery, including all forms of slavery, servitude, forced and compulsory labour and human trafficking are abhorrent practices that continue throughout the world today. WHSmith is committed to ensuring that the human rights of anyone working for us in any capacity are fully respected. We recognise we have a responsibility to prevent modern slavery, and to mitigate and remediate cases where necessary, and we have zero tolerance for any cases of human rights abuses in our business operations or supply chains.

This year we made progress in strengthening our approach, which includes:

- The supplier onboarding process for the Travel UK and International (Rest of the World) divisions has been updated to request information on supplier policies and processes at the earliest stage. This means that all trade suppliers for these divisions are being assessed for potential risks prior to placing orders.
- Continuing our work to extend our Worker Representation project with 20 per cent of own brand suppliers now included in the initiative.
- Developing our due diligence processes for non-trade goods and services by incorporating ethical trade and broader sustainability questions into the tender process. Next year, this will be extended to include questions relating to Diversity, Equity and Inclusion.

This statement sets out the steps taken to prevent slavery and human trafficking in the operations and supply chains of all subsidiary companies included within our financial statement for the year 2024/25 including WH Smith Travel Limited, WH Smith Hospitals Limited, WH Smith North America Inc and WH Smith Australia Pty Ltd. Measures taken in respect of WH Smith Retail Holdings Limited and WH Smith High Street Limited have been included in this statement prior to the sale of the High Street business on 29th June 2025 and for Funky Pigeon Limited prior to its sale on 14th August 2025. The statement was approved by the Board of WH Smith PLC on 2nd February 2026.

Andrew Harrison
Interim Group Chief Executive, WH Smith PLC
Date: 2nd February 2026

Our Business Operations

WHSmith is a leading global travel retailer for travel essentials with a presence across more than 30 countries. Following the divestment of our High Street and Funky Pigeon businesses, we have established a platform for long-term growth as a pure-play global travel retailer. We operate across three divisions, directly employing over 9,000 colleagues:

Travel UK is the largest division in the Group and operates stores in a range of locations, including airports, hospitals, railways stations and motorway services areas. Our strategy is to become a one-stop-shop for travel essentials across UK transport hubs, supporting customers on their journeys. We sell a range of travel essentials including food and drinks, health and beauty, books, magazines, digital accessories and souvenirs. This year, we have enhanced and expanded our *Smith's Family Kitchen* offer with an expanded meal deal proposition and an enhanced hot food and coffee range. As of 31st August 2025, Travel UK operated from 593 stores.

As the world's largest travel retail market, **North America** is our most exciting opportunity for growth. We serve customers a wide range of products through a diverse portfolio of stores in major airport hubs across North America, including food and drinks, news, gifts, local souvenirs and travel accessories. We operate under our own brands such as District Market, Flight Stop, Lick, Marshall Rousso and Root & Branch and an extensive array of franchised stores including Tom Ford, Lego and Harley Davidson. Our InMotion brand provides digital products including a wide range of headphones, mobile power devices, Bluetooth speakers and travel accessories. As of 31st August 2025, we operated from 362 stores in the United States and Canada.

Our **Rest of the World division** is focused on growing and building scale in strategically important markets, particularly in Australia, Ireland and Spain, whilst actively managing our store portfolio in our other markets thorough Europe, the Middle East and Asia. As of 31st August 2025, we had 325 stores with approximately 60 per cent directly operated by WHSmith, 10 per cent operating as joint ventures and 30 per cent operating under a franchise model. Further details of international locations, including the numbers of stores in each country, can be found on our [website](#).

Our Supply Chain

WHSmith rely on over 3,000 suppliers to provide trade products, goods not for resale and services. Suppliers range from large multi-national companies to small and medium sized enterprises.

Purchasing and supply chain management are led by a team of buyers based predominantly in the UK, USA and Australia supported by a procurement and ethical trade team based in Hong Kong and Shanghai.

Own brand products

We work with over 140 suppliers who provide our own-brand products, including food ranges, technology products, stationery and other travel accessories. The vast majority of suppliers for our own-brand goods are based in China, and we also source a small number of products from factories in Bangladesh, Egypt, India, Indonesia, Philippines, South Korea, Taiwan, Turkey and Vietnam. Our current factory list is available on [our website](#) and on [Open Supply Hub](#). Chilled food is sourced locally within our countries of operation. We have the strongest relationships, and most influence, with our top 20 suppliers by value, where we buy a larger proportion of their supply and tend to have longer-term commercial relationships. Outside of this supply base, we tend to be a comparatively small

customer, buying relatively limited quantities. Our ability to influence activity with these suppliers is more limited.

We continue to grow our own *Smith's Family Kitchen* brand of food-to-go products, using a small number of familiar suppliers. Due diligence includes reviewing policies on modern slavery and labour rights and checking suppliers' processes for audit and engagement of their supply chain. As we expand our product offering further, due diligence is included at the first stages of onboarding for new suppliers to ensure our Responsible Sourcing Standards are accepted and adopted.

Third party branded products

Over 1,500 suppliers provide third-party branded products, ranging from large multi-national brands to small enterprises, with complex global supply chains involving thousands of businesses. The suppliers we work with source from across the world, but principally from the United Kingdom, China, the US, Australia, Germany and Vietnam. Products include food and drinks, books, newspapers and magazines, cards, stationery, health and beauty and technology products.

Procurement (non-trade)

We have over 1,500 suppliers of non-trade services and goods not for resale, which include IT equipment, store fixtures and fittings, professional services, transport and logistics, staff uniforms and cleaning services.

Governance and policy frameworks

We have a well-developed set of policies and processes to protect the human rights of those who work for us, either directly in our operations, or indirectly through our business partners and in our supply chains. These policies and processes include measures to prevent modern slavery. We will not tolerate any abuse of human rights, including any form of slavery, anywhere in our business, supply chains or partnerships.

WHSmith is committed to respecting human rights in our business operations and supply chain as set out in [the United Nation's Universal Declaration of Human Rights](#); [the United Nation's Guiding Principles on Business and Human Rights](#); and the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#).

Our governance framework

The WHSmith Board oversees the governance of sustainability issues, including those relating to modern slavery and wider human rights. The Group Board has ultimate responsibility for modern slavery and receives updates on the effectiveness of risk management and controls at least once per year. The Environmental, Social and Corporate Governance (ESG) Board Committee leads and oversees delivery of our sustainability strategy, setting out our ambition and monitoring progress. The Committee is responsible for understanding the potential impact and related risks of ESG considerations on the business. It approves the Company's sustainability strategy - including those components relating to human rights and responsible sourcing policies; objectives and the roadmap for delivery; and monitors progress against agreed targets. The ESG Committee meets at least three times per year.

The Group Audit Committee is responsible for governance in respect of company systems for internal controls, business risks and related compliance activities. This includes any principal risks relating to human rights. The Group Executive Committee has overall accountability to the Board for sustainability issues, including those relating to modern slavery.

An ESG Steering Group chaired by the Group Chief Executive and including the Managing Directors of each business, the Group Chief Financial Officer, the Group Communications Director and the Sustainability Director meets monthly to review progress and next steps for all ESG work, including our human rights strategy and modern slavery work.

As part of WHSmith’s risk management processes, detailed risk registers are maintained by each business and used to identify, manage and monitor risks. Business Risk Committees meet quarterly and monitor action plans for measures to prevent modern slavery or associated risk issues in business operations and supply chain.

Modern slavery risks and the measures taken to mitigate those risks are co-ordinated by the Sustainability Director, who also leads the development of policies, processes and wider activities to prevent modern slavery across our businesses and supply chains.



Policies and standards

Our policy framework includes a number of group-wide standards relevant to protecting human rights and preventing modern slavery, all of which are reviewed annually by our Board-level ESG Committee.



Our Code of Business Conduct

Describing how we do business

Revised: January 2025



Human Rights Policy

Revised: January 2025



Responsible Sourcing Standards

Ethical trading requirements for suppliers to WHSmith

Revised: January 2025

One of WHSmith's core values is 'Value our People' and we try to ensure that all colleagues are valued and respected in an open and honest environment. Our [Code of Business Conduct](#) sets out how our business operates, and what is expected of every person who works for and on behalf of WHSmith. This includes WHSmith employees, directors, contractors, subsidiaries, joint ventures, suppliers, franchisees, agents, consultants and professional advisors.

Our Code of Conduct makes it clear that we will not tolerate any form of discrimination, harassment or bullying. In support of this Code of Conduct, we have additional policies covering equality and diversity, dignity at work, grievance mechanisms and whistleblowing.

Our [Human Rights Policy](#) emphasises our commitment to respecting the human rights of our employees, those working for our suppliers and business partners, and our customers and the communities in which we are based. It sets out our values, principles and monitor procedures for each of our stakeholder groups and includes those linked to grievance mechanisms and access to remedy.

Expectations for suppliers and business partners are set out in our [Responsible Sourcing Standards](#) which are aligned to the Ethical Trading Initiative's (ETI's) Base Code. These Standards provide further clarification on our expectations regarding modern slavery controls, including restrictions on the withholding of identity documents and payments of deposits, additional information on verification checks for child labour and steps to prevent excessive working hours. We also stipulate that no worker should have to pay a fee or other deposit for a job and include specific policy requirements aimed at protecting migrant workers, agency staff and female workers.

We continue to support industry-wide initiatives and are a signatory to the British Retail Consortium's [Better Retail, Better World](#) actions, which commits the retail industry to build a fairer, more sustainable economy in line with the UN Sustainable Development Goals, including promoting decent work for all.

Embedding our policies

All employees are expected to re-appraise themselves of the requirements of Our Code of Business Conduct and associated policies covering modern slavery risks on an annual basis and certify that they have done so. The Code of Business Conduct is also included in induction material for all new starters. We expect our staff to have completed a number of essential training courses relating to responsible commercial practices, including risks from modern slavery.

We regularly refer to the requirements of our Code of Business Conduct and Responsible Sourcing Standards through our dialogue and engagement with suppliers, business partners and franchisees. WHSmith's joint venture and franchise partners are required to provide written confirmation of compliance with our policies every year. Our Responsible Sourcing Standards are included in all standard supplier contracts and agreements. Potential new suppliers are informed of our Responsible Sourcing Standards during the tender process so that they can take our requirements into account when quoting for the provision of goods or services. Any potential new supplier of our own-brand products is audited by our in-house, specialist ethical trade team before any order is placed.

Own-brand products: suppliers are required to notify WHSmith of any non-compliances with our Responsible Sourcing Standards. We audit suppliers of our own-brand products at least every two years and have processes in place to support remedy with any non-conformances and drive continual improvement. Audits are primarily conducted by our in-house, specialist teams based in Hong Kong and Shanghai, who make specific checks on modern slavery as part of their processes. The team

undertake announced and unannounced site visits to own brand suppliers, in addition to assessing the reports of inspections undertaken by third party audit firms.

Third party audits, covering the same elements of the ETI's Base Code as our own, are used to assess compliance with our Responsible Sourcing Standards for those factories where the order value and ethical trade risk is low. Our in-house team will review the report and assess any corrective action plan and may follow this up with a physical visit if there is any doubt that standards are not being met. We also ask our suppliers to ensure that they are upholding the same standards of human rights, including steps to prevent modern slavery in their own supply chains.

Any issues identified are categorised by level of seriousness, and an action plan is put in place to address non-compliance within an agreed timescale. If the factory does not adhere to an agreed corrective action plan to address areas of non-compliance, the supplier receives a formal written warning. This communication outlines the reasons for the warning and the steps which would need to be taken before any orders will be resumed. In the event of any serious violations, where a supplier shows no steps to improve, no further orders will be placed.

WHSmith funds a confidential worker hotline operated by a third-party organisation, to provide a channel for workers to report any concerns that they may have over their employment conditions or possible exploitation. Any suggestion of any breach in our responsible sourcing requirements is investigated thoroughly and the required remediation put in place.

There were ten phone calls to the worker hotline during the year. Three enquiries related to pay and benefits, two to living arrangements in dormitories, two to canteen arrangements, one to loss of personal belongings, one to overtime and one to a grievance regarding line management. The hotline operator provided updates and information to help the workers.

When our local team visit the factories for either an audit, worker representation meeting or training, the team take posters to display within the factory to promote the worker hotline. During the worker interviews, the auditor reminds the workers that there is a confidential hotline that is operated by a third party, and they can either call or send a message via WeChat.

Third Party Products: suppliers of trade products which do not carry one of our brands are informed of our policies and Responsible Sourcing Standards prior to onboarding. Suppliers are asked to provide due diligence information at the earliest stage of their engagement with WHSmith, with our expectations being made clear during commercial negotiations.

Whistleblowing hotline

Our confidential whistleblowing hotline, 'Speak Up' is available for employees, agency staff and third parties to report any concerns they may have about any aspect of their work for WHSmith, including modern slavery concerns or human rights violations. The operation of this is managed by '[Safecall](#)' and concerns can be raised by telephone or online. There were no reported incidents relating to modern slavery during the reporting period.

WHSmith commits to taking reasonable steps to investigate whistleblowing disclosures by:

- Promptly acknowledging receipt of the concern.
- Assigning an impartial investigator with appropriate training.
- Conducting a timely and fair investigation in line with internal standards.
- Providing updates to the whistleblower at key stages.
- Documenting findings and actions taken.

- Ensuring confidentiality throughout the process.

Risk identification and assessment

We use a wide range of sources of country and supplier-specific information from external organisations and our own intelligence gathering in order to inform our risk identification and assessment processes.

We recognise that there is a risk of modern slavery in any area of our business or supply chain, and that the risk is greater for certain groups of individuals, such as migrant workers, agency staff and seasonal employees. In order to better understand and continually assess those areas of our business and operations which give rise to the highest modern slavery risks, we use a number of external and internal sources including:

- Membership of the [Ethical Trading Initiative](#) (ETI) which gives us access to resources, guidance and benchmarking. We participate in the General Merchandising workstream with other retailers, providing peer learning and examples of best practice within the industry. We have access to dialogue with other companies, civil society groups and trade unions on best practice in identifying, managing and reporting on modern slavery issues;
- Membership of the [British Retail Consortium](#) (BRC) and the [United National Global Compact](#) (UNGC) which provide information and insights on modern slavery and human rights issues;
- Sources of modern slavery risks for particular countries (such as the [Global Slavery Index](#) produced by the Walk Free Initiative and the International Trade Union Congress [2025 ITUC Global Rights Index](#));
- Information from in-house supplier engagement and audit processes, and third-party audits, including those published through [Sedex](#). We recognise there are limitations in audit investigations, and so our approach includes wider engagement and collaboration processes with suppliers; and
- Interviews with workers and with worker representatives to understand the issues that are important to them in their place of work. We conducted confidential worker surveys, and the workers gave ratings, which ranged from 1 (lowest satisfaction) to 5 (highest satisfaction). The survey included different areas such as working hours, overtime arrangement, air quality in the workshops, noise levels and PPE usage. There were some areas in the survey for workers to provide opinions on top of the existing questions. 31 factories joined the survey, and 2,031 completed surveys were received. The average score was 4.46 out of 5 and the issues raised typically related to food quality and conditions in factory canteens and overtime arrangements. Our team provided feedback to the factory management individually to follow up on concerns raised, and the findings integrated into our due diligence processes to further evaluate in future site visits.

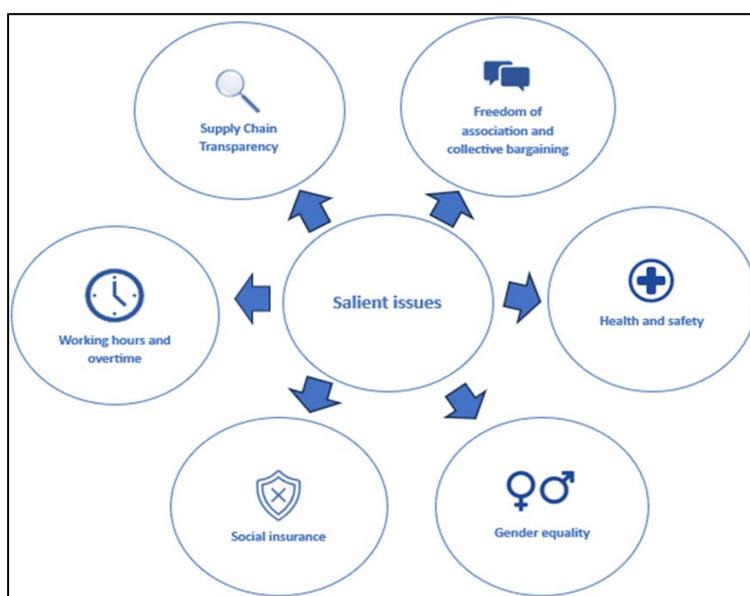
In our business operations, areas of potential exposure include use of agency workers contracted for security and cleaning services, many of whom have moved to the UK from other countries.

The potential risks for **service providers and other business partners** include workers involved with store construction and refit providers, and shipping and distribution partners.

In our supply chain for trade goods, areas of potential exposure include:

- Bonded labour in the manufacture of stationery products, toys, gifts and technology accessories for foreign workers who may have been asked to pay deposits to recruitment agencies, hand over identity papers, or ask for an exit permit to leave the country.
- Exploitation of seasonal and foreign workers in our chilled food supply lines.
- Child labour in the manufacture of gifts, technology accessories, stationery products and toys, particularly in China, India and Malaysia.
- More than 85 per cent of our own-brand products come from China where there is a risk of forced labour, excessive working hours and wages below statutory requirements.

We continue to utilise the results of our risk assessment to better understand the nature of potential and actual risks and to ensure that they are being appropriately managed and mitigated. We regularly review our most salient labour risks and are working towards ensuring we can support the people who work for us and on behalf of WHSmith:



Due diligence and risk management

Our due diligence processes focus on those areas of highest risk identified by our risk identification and assessment processes. We monitor our business and supply chain for any indicators or evidence of modern slavery or human trafficking and ensure that there are controls in place to prevent incidents occurring.

WHSmith's due diligence process is based on the [UN Guiding Principles on Business and Human Rights](#), ensuring that we identify, prevent, mitigate and account for how we address any adverse impacts. Our due diligence is based on some core and practical beliefs – that workers are at the centre of the process; that modern slavery is likely to exist somewhere in our supply chains; that collaboration with business partners, suppliers and other third parties is essential; and that due diligence should be closely aligned to our commercial business practices.

Due diligence in our business operations

Our due diligence activity to mitigate risks from modern slavery in our own operations begins with ensuring that our staff know how to spot the signs of modern slavery, what questions to ask when working with business partners and what else might be required of them to identify and mitigate any risks. Line managers, our human resource teams and personnel working with our franchisees and business partners have all completed our online training course on modern slavery.

Our recruitment and onboarding procedures ensure that employees are eligible to work in their country of residence, and that they have a bank account in their own name. There is a 'speak up' line for employees and agency workers to raise any concerns that they have, and call handlers have been trained on how to identify modern slavery risks. Calls are monitored for any suspected concerns in relation to modern slavery.

Management teams in all our international businesses are regularly briefed on possible indicators of modern slavery and the associated risks. Our International Management Team based in our UK head office regularly visit our international operations in Europe, the Middle East and Asia to emphasise the importance of due diligence to prevent modern slavery.

We have made on-going efforts to promote the wellbeing and mental health of all our workforce, with regular communications about how employees can look after themselves, and places where they can seek support locally if they need it. We continue to promote the WHSmith Benevolent Fund, a registered charity that benefits WHSmith employees and their families who are in financial difficulty or hardship and to ensure that all staff were aware of the support line available for all employees to seek confidential third-party help with any challenges that they may be facing.

GXOs manage our UK and US distribution centres and has internal policies on modern slavery, how to spot the signs and what to do if there was a suspected case or cause for concern. The information is available to all employees. Training for employees about modern slavery is part of the mandatory Code of Business Ethics training. Posters across each site provide step by step instructions on how to report concerns over potential modern slavery.

Due diligence in our supply chain

We continue to focus on our own brand products as we believe we have greater visibility and leverage with this part of our supply chain. We operate a long-established, supply chain monitoring process to assess and mitigate ethical trade risks for our own-brand suppliers. Labour rights are a key part of this process and are included in the evaluation of new suppliers and the on-going management of existing suppliers. The work is undertaken by a specialist team based in Hong Kong and Shanghai. We continue to extend our due diligence processes for third party products.



As part of our supplier on-boarding process, any new suppliers to WHSmith must provide evidence of adherence to international standards of human rights and environmental management and that they comply with our Responsible Sourcing Standards. All new high risk or high value suppliers of WHSmith-

branded products are visited by our in-house team before any orders are placed. Lower value potential suppliers are required to provide an independent assessment of their ethical working practices for us to review.

If a potential new WHSmith-branded supplier is found to be non-compliant with a part of our Responsible Sourcing Standards, we will try to work with them to address the issue. If we believe that after appropriate support, non-compliances cannot be remedied, we will place no further orders with that particular supplier.

We use a combination of in-house audits, third party assessments and on-going engagement with suppliers and workers to identify any potential or actual incidents of modern slavery. Audits are often unannounced and include confidential worker interviews, inspection of worker accommodation and extensive document checks. Special attention is paid to modern slavery and the process is focussed on risks that are appropriate to individual suppliers. For example, our visits to Chinese factories will look for signs of excessive working hours, risks to agency workers or any signs of under-age labour

Working hours are closely monitored to ensure that long hours are strictly limited to peak times to cope with seasonal demand and are not a permanent feature for workers. We also ensure that there is a clear policy for voluntary overtime hours which workers agree to and are paid for accordingly. We avoid placing late orders wherever possible to ensure that factories have enough time for production and do not need to put pressure on workers to work long hours.

We have maintained regular engagement with our suppliers and have strengthened our due diligence activities to promote worker health and safety, fair payment practices and limits on worker overtime.

During our 2024/25 financial year, our factory audit and supplier engagement programme identified a number of non-conformances with some elements of our Responsible Sourcing Standards that could indicate a heightened risk of modern slavery. These included overtime wages not being paid in accordance with the statutory minimum; lack of transparency on reviewing working hour and wage records; excessive working hours which are assessed against both the legal requirement and our Responsible Sourcing Standards; and payment irregularities. We have agreed action plans with all suppliers to address any non-conformances and followed up to ensure that any impacts on workers have been appropriately remedied.

We require suppliers to maintain a mechanism for workers to openly communicate and share grievances with management, without fear of reprisal, intimidation or harassment. This requirement is included in our Responsible Sourcing Standards and compliance is checked as part of our audit programme.

We know that audit processes are not necessarily the most effective way of identifying incidences of modern slavery, and so we continue to engage with our suppliers to help them build their management systems and mechanisms for workers to be able to present their views to and raise any concerns with senior management. We are proactively working with key suppliers in China to increase the channels for workers to voice any concerns they may have over labour standards or modern slavery issues.

We have helped to establish worker representative councils, to increase worker voice representation to raise and resolve issues regarding working conditions, pay, or any concerns about modern slavery. Factory management are provided with training on how to ensure worker representatives are freely elected, how to collect suggestions from all employees and how to report back on outcomes from the

worker committee meetings. WHSmith monitors the worker committees closely, reviewing agendas and meeting minutes and ensuring that any corrective action is undertaken, and that appropriate remedy is provided for workers.

The aim of the project is to help some of our key suppliers to develop fully functioning worker management committees to represent workers on any matter affecting their rights and to resolve problems as they arise. To date, we have helped to implement employee committees in 20 per cent of own brand factories, enhancing dialogue with management for over 5,000 employees. Factory managers are provided with training from our in-house ethical trade specialists on how to ensure worker representatives are freely elected, how to collect suggestions from all employees and how to report back on outcomes from the worker committee meetings. Over 200 issues were raised this year, including those relating to the working and dormitory environments, food quality, working hours, annual leave and overtime pay, with all of them being addressed and remedied successfully.

We are continuing to engage with tier two suppliers who provide materials and components to our direct tier one suppliers and have visited nearly half of our tier two suppliers assessed as providing significant materials or componentry for our own brand products. Our initial focus has been completing audits on the tier two factories supplying our top 20 direct tier one suppliers (by value). Our audits are identifying similar levels of compliance and the same issues as for our tier one factories. Our Asia Sourcing team continue to provide support to suppliers to build up their own capability to identify and manage salient risks in their supply chains independently.

We continue to review the policies and process to minimise any risk of modern slavery in the businesses of our UK-based suppliers of chilled food to confirm that appropriate controls are in place to assess and address modern slavery risks.

Third party branded products: Improvements to our supplier onboarding process now mean that we are receiving initial due diligence information from all new suppliers, prior to orders being raised. This includes whether they have policies addressing the prevention of Modern Slavery and Human Rights abuses, their compliance with our Responsible Sourcing Standards, and whether they conduct due diligence on their supply chain. Additionally, suppliers are asked to confirm that they are willing to share supply chain details and audits upon request, and that they are not supplying products from countries on our restricted list.

The other part of our due diligence for third party products relates to the existing suppliers that we already work with. We risk assess all new lines on the basis of country of origin and the type of product supplied, and higher risk lines are subject to additional due diligence in the form of supplier engagement and audit review.

Training

We recognise that all our colleagues working with suppliers and business partners need to be able to recognise the signs of modern slavery and to know what to do if they encounter anything of concern. Our suppliers also need to understand that modern slavery will not be tolerated in our supply chain and that they must have policies and processes to prevent it.

Our digital learning platform which is for all WHSmith colleagues based in the UK includes mandatory completion of our e-learning course on modern slavery by those employees who have direct contact with our suppliers, business partners or who work in high-risk areas of our business. Colleagues from commercial teams, procurement, human resources and the international team complete the training

on an annual basis. The course is designed to ensure that anyone in our business who is likely to interact with suppliers or other business partners understands:

- What we mean by the different types of modern slavery;
- How to identify possible risk factors and indicators of modern slavery;
- What our Responsible Sourcing Standards and Human Rights Policy requires of suppliers;
- What to do in the case of finding any evidence of bonded, forced or child labour, or human trafficking.



All employees are required to re-familiarise themselves with our Code of Business Conduct and associated policies every 12 months. Our e-learning materials on the issues covered by the Code of Conduct include sections on human rights and supplier engagement processes.

This year, our Ethical Trade Manager participated in a peer review project organised by the UN Global Compact. Two representatives from other companies reviewed and provided feedback on our modern slavery statement, and we discussed the points raised to gain further clarity and support on what could be included in the future. In return, our Ethical Trade Manager provided advice to two of the other companies in the project.

Additionally, we joined the [UNGC working group on modern slavery](#) which provides a forum to discuss key risks within modern slavery and human rights. During these sessions, we connected with experts working on modern slavery issues and brought these learnings back to our own work to further evolve our approach.

Members of the ethical sourcing team also attended working groups on human rights in supply chain held by ETI and BRC in order to learn more from others about emerging issues and best practice in the retail industry.

Evaluating the impact of our programmes

We continue to develop ways of monitoring the effectiveness of our policies and processes to prevent modern slavery. Effectiveness is reviewed as part of our quarterly Business Risk Committee meetings, by the ESG Committee and by the Group Audit Committee which are sub-committees of our Board.

We monitor and evaluate:

- written confirmation of the acceptance of our policies by our business partners;
- key performance indicators relating to our factory audit programme, including the number of supplier assessments completed, individual and collective supplier ratings, key issues that have been identified and follow-up actions required to address any non-conformances;
- the rollout of training programmes and feedback from course attendees to ensure that our training meets our stated learning objectives;

- feedback from employee and supplier hotlines and surveys and through our engagement project focussed on worker representation;
 - any other information gathered from our due diligence activities.

Ongoing Commitments

- Refresh our modern slavery training for all colleagues.
- Further increase our own brand suppliers participating within the worker representation committees.
- Issue our Ethical Trade and Sustainability questionnaire to non-trade suppliers to evaluate risks in this part of our supply chain, particularly in relation to modern slavery.
- Review due diligence processes for our North America and Australian businesses to ensure they remain appropriate as commercial strategies evolve.