



Our Code of Business Conduct

Describing how we do business

Revised: January 2025

A message from Carl Cowling, our Group Chief Executive

Our Code of Business Conduct governs how we run our business and sets out our guiding principles to ensure that we act ethically and with the utmost integrity in all situations. These principles define the conduct that is expected from anyone who works for WHSmith in any capacity, in order that we earn and maintain the trust of our customers, colleagues and all other stakeholders.

The Code is more than a set of rules to ensure that we comply with the law. It guides our behaviours and how we live our values to inform our decision-making so that we always do the right thing.

We ask anyone working for WHSmith to take time to read this Code of Conduct and understand how it applies to their role. If anyone has concerns that this Code is not being adhered to, then we ask that they speak up straight away.

This Code of Conduct has been approved by the WHSmith Board.

Carl Cowling
Group Chief Executive

January 2025

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Why we have a Code

We must always act with integrity, making the right decisions and demonstrating the appropriate behaviours to earn the trust and respect of our customers and all those with whom we do business.

Our Code of Business Conduct sets out how our business operates, and what is expected of every person who works for and with WHSmith. This includes WHSmith employees, directors, contractors, subsidiaries, joint ventures, suppliers, franchisees, agents, consultants and professional advisors. We expect our business partners and suppliers to adhere to the same principles defined in this Code and to abide by our Responsible Sourcing Standards. Our Code also sets out our responsibilities to our customers, our employees, our shareholders, our suppliers and the communities in which we operate.

WHSmith is an international business. This Code of Conduct cannot cover all laws and regulations in all countries where we operate. We expect those who work for us to be familiar and fully compliant with their local laws and regulations. Where there is a difference between our Code and local laws and regulations, the most stringent standard should always be applied.

Our Code of Business Conduct summarises a series of individual policy documents aimed at employees, contractors and business partners. These policy documents are available in local languages and we mandate that everyone working for WHSmith confirms that they have read and understood these policy requirements annually. We will monitor compliance with this Code and provide training on any areas where we believe further guidance is needed.

Whistleblowing

We encourage anyone who works for or with us, to speak up if they feel a working practice is not ethical, safe or breaches our Code of Business Conduct. Employees must report any behaviour that they suspect to be unlawful or criminal such as bribery, fraud or breaches of data privacy. They can do this through speaking to their Line Manager in the first instance, or if this is not possible to our Human Resources team or by contacting WHSmith's external Whistleblowing helpline at: www.safecall.co.uk/report/ or in the UK on 0800 915 1571 or on one of their international numbers; All reports are treated with dignity, respect and confidentiality.

When someone raises a concern, a decision will be made as to which area of the business should initially respond. We will make sure we have all relevant information from the person raising the concern, and then decide whether the concern needs investigating further. We will keep detailed records throughout the process and maintain regular contact with the person raising the concern to make sure they are kept informed.

WHSmith has a non-retaliation policy: no action will be taken against anyone reporting a genuine concern, even if there is no proven unlawful conduct or compliance breach. We

have a policy to protect the identity of anyone raising a concern and will not tolerate any retaliation against those individuals. Any report will be kept private and confidential throughout the investigation, subject to our legal obligations. A report can be left anonymously, although this may affect our ability to fully investigate any concerns raised.

We will instigate disciplinary action and where necessary legal action against anyone who is found to have breached the Code of Conduct. This can range from warnings to dismissal, depending on the nature of the breach.

Our values

We strive to be an outward-facing, customer-focused, responsive organisation that delivers on our promises. To achieve this aim, everyone working for us needs to live our four key values:

1. Customer Focus – We will keep the customer at the heart of all that we do.
2. Drive for Results – We will act with tenacity to deliver ambitious and competitive results.
3. Accountability - We will take responsibility and deliver what we say we will.
4. Value our People - Our people are respected and valued in an inclusive, open environment.

Our business principles

WHSmith seeks to operate with integrity, honesty and transparency and we respect the legitimate interests of all stakeholders. All WHSmith companies and employees are required to comply with the laws and regulations of the countries in which we operate. We are committed to ensuring full respect for the human rights of anyone working for us in any capacity.

1. Shareholders

The Company is responsible to those who provide our funding. We -

- Communicate accurately and in a timely manner to all concerned regarding our policies, achievements, risks and prospects.
- Seek to use financial resources entrusted to us in ways that maximise value over time.
- Provide financial reports that are accurate and timely.
- Always work in compliance with the provisions of the Stock Exchange Listing Rules and corporate governance best practice.

2. Employees

The Company values its employees highly. We aim to achieve a working environment in which:

- Those who work for us are proud of the Company and feel responsible for its success.
- Everyone is respected, treated fairly, listened to and involved.
- People achieve real satisfaction from their accomplishments and business friendships and enjoy their place of work.

This will be achieved through a climate and style of leadership which is direct, open to new ideas, offers personal accountability and recognises individual and team achievements. Within the Company everyone contributes to its success. In return, we will aim to provide a good career at whatever level.

We -

- Respect the dignity and human rights of all employees.
- Provide healthy and safe work environments.
- Recruit the right people for the right job.
- Ensure that working hours and annual leave arrangements are fully compliant with national laws and collective agreements, and that overtime is voluntary and not excessive.
- Provide a range of flexible working patterns.
- Have a transparent remuneration policy that fairly rewards the contribution of our people.
- Provide equal remuneration for men and women workers for work of equal value
- Invest in training and development and encourage employees to develop skills and progress their careers.
- Do not tolerate any sexual, physical or mental harassment of our employees.
- Promote an equal opportunities culture that encourages diversity. We do not discriminate on the grounds of colour, ethnic origin, gender, sexual orientation, age, disability or religion.
- Do not use any form of forced, compulsory, trafficked or child labour.
- Respect the right of employees to freedom of association and collective bargaining.
- Encourage employees to report any suspicions of fraud, corruption, bribery or other undesirable practices through our defined processes.
- Maintain effective two-way dialogue with employees through company information and employee consultation.
- Ensure transparent, fair and confidential processes for employees to raise concerns including through informal and formal grievance mechanisms, without fear of reprisal.
- Actively communicate these principles to employees through various internal engagement channels.

3. Customers

The Company's customers are of paramount importance. We -

- Seek to be honest and fair in our dealings with our customers.
- Provide the quality and standard of service that customers have a right to expect.
- Provide and promote a range of products responsive to customer needs.
- Provide products that are safe, fit for purpose, meet legal standards and are not described in a misleading manner.
- Ensure that customer data is kept secure and only used for the purposes for which it was collected.
- Treat all customer complaints seriously and provide a readily accessible source of advice and guidance regarding our products and services.

4. Suppliers & Business Partners

The Company's relations with its suppliers are based on mutual trust and respect. We -

- Seek to be honest and fair in our relationships with suppliers and business partners.
- Pay suppliers in accordance with agreed terms.
- Ensure that we treat suppliers and franchisees fairly and do not misuse or abuse our purchasing power.
- Respect any confidential information.
- Respect copyright and intellectual property rights.
- Have a policy not to offer, pay or accept bribes or substantial favours.
- Have a set of Responsible Sourcing Standards which are communicated to our suppliers. We work with our suppliers to ensure that these Standards are understood and met.
- Ask our suppliers and business partners to meet as a minimum the same standards of business conduct as those outlined in this Code.

5. Community

The Company seeks to be a good corporate citizen, respecting the laws of the countries in which we operate and making an important contribution to local communities. We -

- Aim to make the communities in which we work better places to live and do business
- Seek to be sensitive to the local community's culture and social and economic needs.
- Listen to the concerns that local communities may have and seek to answer any questions.
- Encourage our employees to be involved with local communities to their mutual benefit.

Our main vehicle for charitable giving is the WHSmith Group Charitable Trust, an independent registered charity with a Board of Trustees, which has two objectives:

- To support the local communities in which WHSmith staff and customers live and work; and
- To support education and lifelong learning, helping people of any age to achieve their educational potential.

These objectives are consistent with the core activities of our business. Full details are provided at www.whsmithplc.co.uk/sustainability/community/whsmith-trust

6. The Environment

The Company is committed to protecting the environment and to making continuous improvements in the management of our impacts. We -

- Measure, monitor and seek to reduce the environmental impacts of our business activities.
- Optimise our use of energy and natural resources and reduce our generation of waste.
- Minimise any harmful emissions from our operations.
- Comply with relevant national and international legislation and standards.
- Work with suppliers and business partners to develop products that minimise the impact on the environment.

7. Public policy engagement

The Company will co-operate with governments and other organisations, both directly and through bodies such as trade associations, in the development of legislation and other regulations relevant to our business. Our lobbying channels are limited to direct engagement, for example through meetings with policy makers or responses to Government consultations, or via memberships of trade associations, such as the British Retail Consortium. Where our views differ significantly from our trade associations on issues that are important to us we will make these known. We do not make political donations or support party political interests. We commit to publicly disclose any involvement in trade organisations and / or lobbying activity should this take place in any given year. Any external engagement on energy or climate change must be consistent with the Company's position that global emissions need to reduce to net zero by 2050 to restrict global warming to 1.5 degrees.

Standards of conduct

1. Individual conduct

Bribery and corruption

Bribery is the act of offering, giving, requesting, accepting or receiving something of value in exchange for influence or action in return. Bribes can be offered in many forms: facilitation payments, improper offers of gifts or hospitality, and donations to political parties can all constitute forms of bribery. Corruption can include money laundering and embezzlement. In many countries, the offering or giving of anything of value to public officials is illegal. We do not make any political donations.

WHSmith does not tolerate bribery, corruption or extortion in any form, either within our own business or in those we do business with. Bribery and corruption is a criminal offence under the

UK Bribery Act 2010 – which is widely regarded as one of the most all-encompassing anti-corruption laws in the world - and this applies to any bribes paid or received in connection with WHSmith's businesses, or to any of its associated third parties, anywhere in the world. We require all employees and anyone working for us in any capacity to comply with the UK Bribery Act, in addition to any local anti-bribery and anti-corruption laws. No one working for, or on behalf of, WHSmith should give or receive a bribe of any form. If they are confronted with bribery or corruption, they should immediately raise it with their Line Manager, or if this is not possible to our Legal team or by contacting WHSmith's Whistleblowing helpline. We ensure that staff are familiar with our stance on anti-bribery and anti-corruption and have processes in place to check for any instances of non-compliance.

We expect our suppliers and other business partners always to act in a professional and ethical manner, and to have anti-bribery and anti-corruption policies and programmes to verify compliance.

They must:

- comply with all relevant laws, including, but not limited to, the UK Bribery Act 2010;
- not take any action or permit the taking of any action by a supplier or third party which may render WHSmith liable for a violation of any relevant law;
- not use money or other consideration paid by WHSmith for any unlawful purposes; and
- upon request, be required to have their own subcontractors, consultants, agents or representatives execute a similar written anti-corruption compliance statement, and to confirm to WHSmith that such action has been taken.

Gifts & entertainment

We acknowledge that our employees will at times be offered gifts or entertainment from other companies as part of our normal business relationships. On occasions, offers of

corporate hospitality can be a legitimate part of business, however, this should never influence, or appear to influence, our business decisions. The Company does not expect, desire or encourage gifts and we prohibit the receiving of any gifts or hospitality that are excessive, disproportionate or improper.

Any gifts of hospitality, money, vouchers or items of inappropriate value must not be accepted. If an employee receives a gift from a supplier, publisher, manufacturer or any other business contact, they must inform their Line Manager who will then decide whether the gift can be accepted, whether it should be donated to charity or whether it should be returned to the sender. A central register is maintained of any gift which is not of low value. Samples may be accepted from suppliers, but only as examples of products for work purposes. Once finished with they should be treated as any other gift under the policy.

The Company does not permit the giving of gifts or incentives to third parties under any circumstances.

Conflict of interest

A conflict of interest happens whenever personal and business interests potentially come into conflict, influencing a person's ability to make the right decisions for the business. This may occur when a family member becomes a supplier, or if a known contact of a recruiting manager applies for a role. In the worst case, a conflict can lead to accusations of fraud or discrimination, and so it is important that we manage actual and potential conflicts of interest properly. We must avoid any contracts that might lead to, or suggest, a conflict of interest between personal activities and the business.

We ask anyone working for WHSmith to be aware of potential conflicts of interest and remove themselves from any situation where this could exist. If an employee is unable to avoid a potential conflict, then we ask them to discuss it with their Line Manager.

Insider dealing and market abuse

It is a serious criminal offence for anyone to profit from insider dealing, where someone uses information that they have access to through their job that is not widely available, to inform the purchase or sale of shares or other securities. This includes information about WHSmith, but also information gained through business relationships with our suppliers and other business partners. It is also an offence to share any of this inside information with other people if they might use it to make a trading decision. These rules apply even after employees stop working for WHSmith.

Those employees who are required to have access to insider information are detailed on the WH Smith PLC Insider List and must comply with the WH Smith PLC Share Dealing Code which includes clearance procedures that must be followed prior to any deal.

Fraud and tax evasion

Fraud is a serious crime that harms our business and can severely impact on our financial performance. Fraud is defined as criminal deception committed by a person acting in a

false and deceitful way. This can include theft, forgery, deception and tax evasion, and could take place at our tills, during online transactions, during the transport and distribution of our goods, or in our offices. We trust all employees always to act honestly but ask that if anyone in our business suspects fraud is taking place, that they report it to their Line Manager, Human Resources team or the Whistleblowing helpline immediately. We will always investigate and take action if fraud is taking place.

Tax evasion is a serious criminal offence in many countries and is defined as cheating the public revenue or fraudulently evading tax. The offence requires an element of fraud, which means there must be a deliberate fraudulent action, or an omission to do something with dishonest intent. We make it clear to anyone working for us that it is strictly forbidden to engage in any form of facilitation of tax evasion either directly or through another person. Any request or demand from a third party to facilitate must be reported immediately. Employees are encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion at the earliest possible stage, and we have robust systems in place to monitor and follow-up on any incidences of suspected tax evasion.

Protecting data

We collect, process and make use of personal data from customers, employees, shareholders and other key stakeholders, and they all trust us to treat their data responsibly and lawfully in accordance with the prevailing legislative framework. Each company in the WHSmith Group has a data protection policy which provides full details on what personal information we collect, how this information is used, whether it is shared with any other parties and under what circumstances it is retained.

Our approach to data management is underpinned by a series of principles. All companies that are part of the WH Smith PLC Group must have data protection policies in place aligned to the following principles:

- **Obtaining data:** we will only obtain customer, employee and other personal data through lawful and transparent means, with explicit consent in line with data protection laws.
- **Secure:** we will keep all customer, employee and any other personal data secure.
- **Appropriate:** we will only use data for the purpose for which it was collected, limiting disclosures of personal data to partners to only those purposes described in our privacy policies.
- **Transparent and timely:** we will be fully open about what data we store and how and why we use it. We will notify data subjects in a timely manner when any data breaches occur. Any changes in our data policies will be made public.
- **Retention:** we will only hold data for as long as is necessary for the purpose for which it was collected.
- **Control:** wherever possible, we enable people to make choices about how we use their data, enabling them to access, update or delete their personal information.
- **Safeguards:** we implement appropriate technical and organisational processes to protect personal data against unauthorised access, use or loss.

- **Compliance:** We comply with all national and international data protection laws and seek to implement leading data protection standards.

Our data protection processes are embedded in our Group-wide risk and compliance management systems. We employ a framework of controls to protect against unauthorised access to our systems and data which include maintenance of firewalls and intruder detection systems, encryption of data, penetration testing and regular independent audits of privacy policy compliance. If we share data with third parties, we require them to comply with our company policies. We expect our business partners and suppliers to adhere to the same standards.

Any suspected breaches in data security or any other concerns regarding data privacy should be reported immediately to our Data Protection Officer at data.privacy@whsmith.co.uk or write to the Data Protection Officer at Greenbridge Road, Swindon, Wiltshire SN3 3LD. We ensure that all employees who handle or have access to personal information receive training on data security, that they understand how our data management principles apply to their role and that any breaches of personal data may lead to disciplinary action.

2. Working together

Human rights

Businesses can only be truly successful in a society where human rights are respected, upheld and advanced. WHSmith recognises it has a responsibility to respect human rights and seeks to promote only positive human rights impacts throughout our value chain. We aim to ensure that we are not, directly or indirectly, in any way complicit in human rights abuses.

We are committed to ensuring that all employees work in an environment that promotes diversity, and where there is mutual trust, respect for human rights and equal opportunity, and no discrimination or victimisation. Our Code of Conduct is in line with the United Nations Guiding Principles for Business and Human Rights and includes recognition of:

- the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights); and
- the International Labour Organisation's (ILO's) Declaration on Fundamental Principles and Rights at Work and its associated Fundamental Conventions.

Diversity and inclusion

WHSmith is committed to promoting a culture of inclusion and diversity through our policies, procedures and working practices, aiming to ensure everyone receives equal treatment throughout their employee journey with us. We aim to create a workforce that is representative of our society and promote equality of opportunity for everyone. We recruit, develop, promote, remunerate and provide training for our employees solely based on their skills, experience, achievements and performance and without discrimination.

We know that diverse teams perform better. All our employees should feel able to be themselves and we encourage them to bring their individual viewpoints, styles and experiences to their role. We value all our colleagues for their contribution and we celebrate diversity in all aspects of our business.

We will not tolerate any form of discrimination, especially related but not limited to age, disability, gender, gender identity, sexual orientation, ethnic origin, race, cultural background, family background, social origin or religious belief. We provide training for employees on our position against discrimination and harassment to raise awareness and ensure that anyone working for WHSmith is able to challenge discrimination and to raise any concerns with their Line Manager, Human Resources team or the Whistleblowing helpline.

Preventing harassment and bullying

WHSmith does not tolerate inappropriate behaviour including harassment, bullying or abuse of authority, towards customers, employees, suppliers, business partners or anyone

else. We make every conceivable effort to provide a work environment free from any form of harassment, intimidation or bullying that would be personally offensive to any individual.

We want to ensure that anyone working for or on behalf of WHSmith respects one another and works in harmony to achieve the aims and goals of the business. We want to promote an environment where individuals are confident enough to bring complaints without fear of ridicule or reprisal. This places a personal responsibility on every employee to ensure that the dignity of colleagues, business partners and customers is not abused.

We will instigate disciplinary action and where necessary legal action against anyone who is found to have engaged in harassment, bullying or other inappropriate behaviour.

Health and safety

WHSmith is committed to maintaining the health and safety of all its customers, employees, suppliers and contractors by providing a safe place to work and shop. Every employee has a duty to take care of themselves and others who may be affected by what they do whilst at work. All employees are duty bound to co-operate with the Company's arrangements for maintaining health and safety standards, as well as with responsibilities specified in their terms of employment. Employees are also required to report any workplace accidents and unsafe conditions that they identify.

Our Managers and Supervisors have additional responsibilities to manage health and safety issues under their direct control. This involves ensuring that suitable health and safety arrangements are in place locally and that individual responsibilities are clearly allocated.

We believe that it is just as important to support our colleagues' mental wellbeing as it is to look after their physical wellbeing and health and safety programmes include a focus on employee wellbeing.

We expect our suppliers and business partners to adhere to the same standards of health and safety as our own.

3. Trading Fairly

Competition law

Most of the countries where we operate have legislation in place to protect free and fair competition and there can be significant penalties for companies and individuals who break the law. These laws prohibit agreements or concerted practices between competitors that could affect trading, pricing or business dealings with third parties. Anti-competitive practices could be damaging for our business and so we aim to ensure that all employees understand that they must act independently and must never agree with competitors to fix prices, where we will or will not operate or what we can or cannot sell.

We have processes in place to prevent employees from asking for, receiving or sharing confidential or commercially sensitive information about competitors, for example when they are attending trade association meetings. Retail prices are always set independently and at the Company's discretion.

Sanctions and trade controls

Governments may impose restrictions on dealing with certain people, companies, countries or regions. WHSmith must comply with these laws and we must always be aware of these restrictions when trading internationally. There are extra requirements in the United States as its export laws and legislation on sanctions apply to situations where US citizens, products or currency are involved.

We ask anyone involved with buying, shipping or selling of goods internationally to ensure they are aware of sanctions risks, to make sure that any new suppliers are properly vetted and approved before we do business with them and to seek advice from our legal team if the situation regarding sanctions is unclear.

Some goods may need import or export licences when they are transported across national borders. We have processes in place to ensure that we always comply with import or export licence conditions and reporting requirements.

Clear pricing and responsible marketing

We take the responsibility for the products we sell seriously, and we are committed to listening to our customers. We have a clearly defined set of standards that help to guide our promotional activity, marketing and advertising. Our central aim is to offer our customers choice, whilst also respecting customer views. Customers often have strongly differing views about the products we sell, so we aim to strike the right balance to meet the needs of all our customers.

As part of our commitment to promote and retail all products in a responsible manner, we will:

- Be honest and fair in our dealings with our customers.

- Ensure that our marketing and advertising materials are truthful, accurate, balanced and do not mislead our customers. We will never comment on competitors' activities.
- Provide and promote a range of products responsive to customer needs that provide choice and value for money.
- Sell products that are safe, fit for purpose, meet legal standards and are never described in a misleading manner.
- Always take into account the level of knowledge, sophistication and maturity of the people we are marketing to, particularly children or those with specialist needs. Our advertising should never offend.
- Ensure that any marketing or advertising is clearly labelled as such, including but not limited to magazine editorials, paid-for product placements or celebrity endorsements.
- Make certain that any product information, such as on environmental or health grounds, are balanced, accurate and fully compliant with any laws or trading standard guidelines. We will ensure that any environmental or social claims are substantiated and not over-exaggerated.
- Investigate any customer complaints about our products and react according to the findings of our investigation.
- Provide a readily accessible source of advice and guidance regarding our products and services.

These principles inform the design and development of products as well as the way that we retail and market products. This includes the way a product is positioned and promoted in store.

We endeavour to have clear, accurate and fair pricing across all stores, including those in travel destinations and in hospitals. We try to avoid complex price promotions and frequent price changes. We aim to provide our customers with the products and services they expect from us, as well as a convenience offer in some locations. Our pricing by format reflects the environment in which we operate as rent and operating costs vary considerably across our estate. Our relatively small scale in some of the categories we sell, such as toiletries, food and drinks means we cannot always match the prices of larger retailers, however we do offer our customers value through promotional offers. The timing and nature of our promotions can, from time to time, vary by location and channel.

Quality and product safety

We firmly believe in putting the customer first which means we must maintain and improve on the high standards our customers have come to expect. This is not only important for delivering customer satisfaction but also makes good business sense.

We will:

- Pursue a commitment to constantly improve the design, quality and safety of all our products to ensure suitability for customer use and market position.
- Comply fully with recognised standards required by law for every product line we sell.

- Take appropriate actions on the feedback we receive from our customers to continually improve our overall product offer.

Product safety is one of our key priorities and our quality assurance teams in Asia and the UK conduct a rigorous quality and safety assessment process to ensure that products are safe, fit for purpose and meet legal standards and our own brand standards. We pay particular attention to products designed for children. We closely monitor developments in legislation to ensure that products are compliant.

All own brand products and products which are new to our business are risk assessed for compliance with legal, safety and quality requirements before being made available for sale. The results from this risk assessment determine what testing is appropriate to ensure compliance. For products which remain in range for a long period, testing is repeated on a regular basis.

For those stores that sell food and within our distribution centres, we have a well-established and comprehensive food safety management system in place. We have strict protocols for monitoring and checking the quality and safety of our food, including temperature checks, food safety hygiene processes for employees, for equipment and our buildings, and signposting of allergens.

Ethical trade

Our procurement is governed by our Responsible Sourcing Standards which set out our expectations for business conduct in our supply chain. The standards are based on several international human rights principles and trading standards including those from the Ethical Trade Initiative, the United Nations and the International Labour Organisation.

Our customers want to be confident that the products they buy have been sourced ethically, made by workers who are not exposed to exploitation or unsafe working conditions, and without harm to the environment. Our ethical trade programme has three key elements to ensure this: training for buyers so that they understand the role they need to play; due diligence to assess supplier compliance with our Responsible Sourcing Standards; and supplier engagement projects aiming to continually improve labour rights and working conditions for factory employees. We provide full training for our buyers to ensure that all purchasing is conducted in compliance with our Responsible Sourcing Standards, and that they understand the risks of modern slavery in our supply chain.

Additional documentation

Available on the [WHSmith plc website](#):

- Diversity, equity and inclusion policy
- Environment policy
- Health and safety policy
- Human rights policy
- Responsible sourcing standards
- Tax policy

Available on the WHSmith intranet:

- Data policies