



Human Rights Policy

Revised: January 2025

Introduction

WH Smith PLC is a leading global travel retailer for travel essentials. We operate in 32 countries through more than 790 retail units in airports, railway stations, hospitals, motorway service stations. WHSmith sells convenience foods, travel accessories, books, stationery, magazines, newspapers, entertainment products, confectionery and health and beauty items.

As an international retailer, WHSmith has a responsibility to respect and support the dignity, wellbeing and human rights of our employees, the workers in our supply chains and the customers and communities that we serve. This means we must act in a way that avoids infringing the rights of others and prevents adverse human rights impacts from our activities.

We are committed to respecting human rights in line with the United Nations Guiding Principles for Business and Human Rights. This commitment includes recognition of all internationally-recognised human rights contained in the following international instruments:

- 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.

In particular we:

- Are committed to safe and healthy working environments.
- 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.
- Do not tolerate forced, bonded or compulsory labour, human trafficking, child labour or discrimination.
- Respect the right of workers to freedom of association and collective bargaining.

This WHSmith Human Rights Policy sets out the minimum requirements that everyone working for and with WHSmith must meet. This policy applies to all companies operating under the WH Smith PLC group structure including our joint venture businesses, and to WHSmith franchise operations. We expect our business partners and suppliers to uphold the same standards, as further defined in our Code of Business Conduct and Responsible Sourcing Standards. Human rights will be included in any due diligence undertaken prior to mergers and acquisitions by or on behalf of WHSmith.

WHSmith will always comply with applicable laws and respect the rule of law. In situations where there is a conflict between domestic legal requirements and international human rights norms, we will seek to uphold our company values.

We recognise the importance of dialogue with employees, suppliers, local communities and external stakeholders who are or could potentially be affected by our activities. This dialogue includes the development and on-going monitoring of our approach to human

rights. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation including for example indigenous people. We recognise that the risks to individuals may differ on the basis of their gender, ethnicity, sexual orientation or age.

We appreciate the power of collaboration in driving change, and seek to work with supply chain partners, civil society, governments and other businesses on human rights. We are members of the Ethical Trade Initiative, an alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe.

This policy has been communicated to all employees through our annual policy self-certification process and is available to external stakeholders via our website. We commit to annual monitoring and reporting on human rights impacts.

Approved by the WH Smith PLC Board: January 2025.

Human rights due diligence

As part of our commitment to embedding a respect for human rights into our business we will undertake appropriate due diligence throughout our operations, supply chains and wider value chain and for existing and new relationships with external parties. This includes:

- Assigning executive-level responsibility for human rights within WHSmith to our CEO and ensuring that there is dedicated management and resource for day-to-day responsibility for human rights across our human resource, commercial and procurement functions. Our human rights work is co-ordinated by our Sustainability Director.
- Undertaking systemic and regular reviews to identify salient human rights issues and risks associate with our operations, wider value chain and external business relationships, both existing and new.
- Conducting a human rights impact assessment of our operations and supply chain and ensuring it is regularly updated to remain relevant and to capture any emerging risks or changes in operating practice. We assess actual and potential human rights impacts when entering new markets, considering new partnerships or engaging with our suppliers.
- Establishing, implementing and embedding robust operating polices and processes to prevent, mitigate and remediate our salient human rights issues. Further details are provided in the next section.
- Providing appropriate training and awareness-raising to ensure this policy is understood by our employees, suppliers and business partners.
- Monitoring human rights impacts on an on-going basis through due diligence processes to ensure consistent implementation and policy compliance and reviewing the findings to introduce improvements where required.

The rights of our employees

We are committed to respecting the human rights of anyone works for us. We want our organisation to be a place where people love to work; where they can be themselves and develop the skills to flourish; and where they feel safe and able to lead healthy lives.

Our Code of Business Conduct sets out the values and principles by which our business operates and expected standards for every person who works for and with WHSmith. These include those relating to:

- Promoting diversity, inclusion and equal opportunities for all.
- Provision of a safe and healthy working environment.
- Zero tolerance of forced, compulsory and child labour, discrimination, harassment or bullying,
- Working hours and annual leave arrangements that are fully compliant with national laws and collective agreements, and that overtime is voluntary and not excessive.
- Equal remuneration for men and women workers for work of equal value.

- Respect for the right of employees to freedom of association and collective bargaining.

The Code is supplemented by a series of more detailed internal policies on specific rights. The policies are implemented through the work of our line managers and human resources teams, using established processes and procedures, for example for people management and health and safety, and through company-wide initiatives such as those promoting diversity and inclusion and mental well-being.

Our informal and formal grievance procedures are set out in our Grievance Policy which is available to all employees through our intranet should they wish to raise a complaint. We have a set of procedures to ensure that the process is transparent, fair and confidential, allowing employees to raise concerns without fear of reprisal. Employees can raise concerns through speaking to their Line Manager, our Human Resources team or by contacting WHSmith's external Whistleblowing helpline. Our informal and formal grievance procedures are set out in our Grievance Policy which is available to all employees through our intranet should they wish to raise a complaint. We have a set of procedures to ensure that the process is transparent, fair and confidential, allowing employees to raise concerns without fear of reprisal. Employees can raise concerns through speaking to their Line Manager, 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 listed on their website. All reports are treated with dignity, respect and confidentiality.

The rights of those working for suppliers and business partners

Strong partnerships with trusted suppliers, landlords and other third-party organisations are a vital part of our success. We rely on international supply chains that span several tiers and close working relationships with joint venture and franchise partners. We work with our suppliers and business partners to drive responsible and ethical standards and ensure that the rights of workers at all stages of our value chain are respected.

We have robust policies and procedures which we expect our suppliers and business partners to share. Our Responsible Sourcing Standards are aligned with the Ethical Trading Initiative's Base Code which was founded on the conventions of the ILO. The standards set out our expectations of suppliers to respect and protect the human rights of their workers. Our joint ventures and franchise partners are expected to operate to the same or similar standards and are required to confirm to us that they are meeting these standards on an annual basis.

We have audit and engagement programmes in place with our suppliers and business partners and seek to continually improve labour conditions for those working in our supply chains. We monitor for non-compliance with our Standards and work to help suppliers strengthen their own compliance and processes. We also require our suppliers to cascade our Standards to their suppliers and sub-contractors.

We require our suppliers and business partners to provide a grievance mechanism that is communicated and explained to all employees. We respect the rights of workers in our supply chain to freely associate and bargain collectively. In countries where grievance systems such as independent trade unions or collective bargaining are not permitted, we encourage suppliers to facilitate the development of parallel means for independent and free association and bargaining.

The rights of customers and communities

We serve millions of customers every year through our shops and online businesses. Customers expect a professional, helpful service in a safe environment and to be able to buy from us products that have met all applicable quality and safety standards. We also provide financial and in-kind support to hundreds of charities and other good causes, often in the communities in which we are located.

Our Code of Business Conduct describes our business principles for engaging with customers and local communities. It also sets out our standards for Product Quality and Safety, Clear Pricing and Responsible Marketing and Protecting Data. We have additional internal policies covering all of these areas, and Data Policies as they relate to customers are available on our website.

Customers can ask questions, raise concerns and make complaints through our customer service channels, either by letter, phone, email or social media. For local community and charity contacts, we have a dedicated email address at sustainability@whsmith.co.uk.

Access to remedy

We commit to providing access to remedy through effective complaints and grievances procedures and we acknowledge the importance of effective remedy for those concerned. We continue to build awareness of employees and supply chain workers on human rights, encouraging them to speak up, without retribution, about any concerns they may have.

Where we have caused or contributed to adverse human rights impacts we will contribute to their remediation as appropriate. We will inform and engage with those who are affected or potentially affected on risks, impacts and management measures and keep them involved in monitoring performance. We will incorporate the lessons learned into our policies and processes to prevent future impacts.