



# **Responsible Sourcing Standards**

Ethical trading requirements for suppliers to  
WHSmith

Revised: January 2025

# Contents

Introduction.....	3
Acting Lawfully and with Integrity.....	6
Employment is freely chosen.....	7
Freedom of association and a right to collective bargaining are respected.....	7
Working conditions are safe and hygienic.....	8
Child labour shall not be used.....	9
Living wages are paid.....	9
Working hours are not excessive.....	10
No discrimination is practiced.....	10
Regular employment is provided.....	11
No harsh or inhumane treatment is allowed.....	11
Disciplinary and grievance procedures are in place.....	11
Responsible recruitment for agency and indirect staff.....	12
Protecting the rights of migrant workers.....	12
Environmental and community impacts are minimized.....	13
Compliance.....	14
Responsible Sourcing of Minerals.....	16
Acknowledgement Form.....	17
Appendix:	
Biodiversity and Sustainable Forests Policy.....	18
Animal Welfare Policy.....	21
Restricted Sourcing Countries List.....	23

# 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.

Our Responsible Sourcing Standards set out our expectations for business conduct in our supply chain. WHSmith is committed to respecting human rights and the environment throughout our operations and supply chain and ensuring that we source goods and services responsibly is a key component in delivering this commitment. We want to partner with suppliers who:

- Are committed to working with integrity, and always operate within the law;
- Provide safe, fair and decent working conditions, respecting employees' individual and collective freedoms and rights;
- Treat all workers with dignity, respect and without discrimination;
- Minimise the impact of their operations on the environment and on the communities in which they are located.

WHSmith is committed to responsible sourcing practices, to ensure that our procurement activities do not have a detrimental impact on worker welfare, the environment or local communities. We expect our partners, suppliers and manufacturers to commit to working towards compliance with these Responsible Sourcing Standards, both within their own operations and those of their suppliers.

This document builds upon and replaces our previous Ethical Trading Code of Conduct and sets out the standards we expect. It is based upon a number of international human rights principles and standards, including:

- [The Ethical Trading Initiative's \(ETI\) Base Code](#);
- [The United Nations Guiding Principles on Business and Human Rights](#);
- [The International Labour Organisation's \(ILO\) Declaration on Fundamental Principles and Rights at Work](#) and associated [fundamental ILO conventions](#) on freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation; and
- [Business Principles for Countering Bribery produced by Transparency International](#).

The requirements in this document constitute minimum and not maximum standards, and they should not be used to prevent companies from exceeding these standards. All of our suppliers are expected to comply with national and other applicable law and, where the

provisions of law and this document address the same subject, suppliers should adhere to the provision which provides the worker with the greater protection.

We monitor compliance through a due diligence process of supplier self-declaration, in-house assessment, independent audit and on-going supplier engagement to verify that all suppliers of WHSmith-branded products meet acceptable standards and are working towards continuous improvement and full compliance with our requirements. We are committed to working with suppliers, their employees, elected representatives and NGO's where appropriate through the due diligence process. Suppliers are responsible for enforcing these standards in their own operations, and in those of their supply chain, and should be sensitive to the rights of their workers in implementing these standards.

We assess and address the risk of modern slavery (including child labour) within our own operations and supply chains. Our policies and practices are in line with the requirements of the United Kingdom Modern Slavery Act 2015, the Australia Modern Slavery Act 2018, the California Transparency in Supply Chains Act 2010 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023. Where applicable, suppliers must produce a modern slavery statement in accordance with legislation and Government guidance. Clause 1 of these standards specifically addresses measures to mitigate the risk of modern slavery, while several other sections and clauses are also pertinent. We pay particular attention to the protection of foreign contract workers who may be potentially vulnerable to exploitation. WHSmith aims to ensure that all foreign workers retain passports and other identity documents to facilitate their unhindered freedom of movement, and do not have to pay recruitment fees that would leave them indebted to their employer. We expect all of our suppliers and partners to follow this policy within their own operations and supply chains, and to ensure that these standards are upheld throughout the value chain.

Suppliers are expected to always act lawfully and with integrity and adopt standards covering these areas:

1. Employment is freely chosen
2. Freedom of association and a right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed
10. Disciplinary and grievance procedures are in place
11. Responsible Recruitment for agency and indirect staff

12. Protecting the rights of migrant workers
13. Environmental impacts are minimised, and community land rights protected

**Who do these standards apply to?**

These standards apply to all suppliers providing products for sale and non-trade goods for all companies operating under the WH Smith PLC group structure, including our joint venture businesses, and to WHSmith franchise operations. This includes suppliers producing WHSmith and InMotion branded products and third-party suppliers. By third party suppliers we mean suppliers who provide any products which do not carry the WHSmith or InMotion brand.

WHSmith commits to supporting and working with suppliers who have genuine difficulties in meeting these standards, or who identify other risks not considered in this document which need addressing.

Carl Cowling

Group Chief Executive

Approved by the WH Smith PLC Board: January 2025

## Acting lawfully and with integrity

Any supplier to WHSmith must comply with all laws and regulations in the country in which it operates, and with other applicable international laws and regulations. These include those relating to international trade, such as sanctions, export controls and reporting obligations; data protection; and anti-trust and competition law. The supplier must not take any action or permit actions by its supplier or other third parties, which may render WHSmith liable for a violation of any law.

WHSmith does not tolerate corruption, bribery 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 and applies to any bribes paid in connection with WHSmith's business anywhere in the world. We require our suppliers, and all those in their supply chain, to comply with the UK Bribery Act, in addition to any local anti-bribery and anti-corruption laws.

Bribery is the act of offering, giving, requesting, accepting or receiving something of value in exchange for some kind of influence or action in return. Bribes can be offered in many forms: facilitation payments, offers of gifts or hospitality, and donations to political parties can all constitute forms of bribery. The supplier must have an anti-bribery policy and adequate processes in place to ensure bribery does not take place in any of its commercial undertakings, including improper offers or payments to or from employees, customers, suppliers, organisations or individuals. On request, the supplier must provide evidence that their own suppliers, sub-contractors, agents or representatives have similar anti-bribery and anti-corruption procedures in place and there are signed compliance statements to confirm this.

Any actual or potential conflict of interest in any commercial dealings with WHSmith must be declared by the supplier. Any ownership or beneficial interest in a supplier by a government official, a representative of a political party or a WHSmith employee must be declared in advance of any contractual relationship with WHSmith.

All financial and commercial dealings should be accurately recorded in the suppliers' reporting systems. There should be no actual or attempted fraud or money laundering and no use of confidential information to engage in insider trading. Any money or other consideration paid to the supplier by WHSmith should not be used for any unlawful purpose. We expect transparency from our suppliers, and double books, fake or deliberately inconsistent records will not be tolerated.

## 1. Employment is freely chosen

- 1.1 Suppliers must ensure that all workers on their site, both permanent and casual, are provided with employment documents that are freely agreed and which respect their legal and contractual rights. These documents must include understandable information about their employment conditions, including wages, hours, holidays and reasonable notice periods and must be provided before workers enter employment.
- 1.2 There must be no forced, bonded, compulsory or involuntary prison labour. Any form of mental or physical coercion, slavery or human trafficking is strictly forbidden. All employment should be voluntary.
- 1.3 There must be no requirement for workers to lodge deposits, provide financial guarantees or lodge identify papers with their employee. Employers must not withhold payments or place debt upon employees. Employees must be free to leave their employment if they so wish after reasonable notice.
- 1.4 Suppliers must respect the rights of workers to take meal and rest breaks as scheduled and leave their workplace at the end of their shift. Any use of worker accommodation must be voluntary and must not restrict workers' freedom of movement, or other principles laid out in this document.
- 1.5 All suppliers must ensure they are familiar with local and international laws on Modern Slavery, including those enacted by the UK and Australian Governments. Suppliers must be willing to support WHSmith in our compliance with our legal requirements, ensuring their own due diligence procedures are in place to prevent modern slavery.

## 2. Freedom of association and a right to collective bargaining are respected

- 2.1 Workers, without distinction, have the right to join or form trade unions or similar representative bodies of their own choosing and to bargain collectively to the extent permitted by applicable law. Conversely, no worker shall be forced to join trade unions or similar bodies against their wishes.
- 2.2 The employer adopts an open attitude towards the activities of trade unions or similar representative bodies, and their organisational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

- 2.4 here the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent free association and bargaining.

### 3. Working conditions are safe and hygienic

- 3.1 Suppliers must provide a healthy, safe and hygienic working environment for employees, contractors, partners and others affected by their activities. Adequate steps must be taken to prevent accidents and injury to health arising from, or associated with, or occurring in the course of work, by minimising, so far as reasonably practicable, any hazards present in the working environment.
- 3.2 The supplier must assign responsibility for health and safety to a member of senior management. The supplier should ensure it meets acceptable standards of health and safety risk prevention, including identifying, minimising and preventing hazards, using trained and competent workers, and providing and maintaining safe equipment, tools and personal protective equipment where required.
- 3.3 The supplier shall have procedures in place to ensure that all of its employees are competent to carry out their work safely. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.4 Access must be provided to potable water, clean toilet facilities and, if appropriate, suitable facilities for safe food preparation and storage. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The supplier must have adequate safeguards against fire, and must ensure the strength, stability and safety of all buildings and equipment. Fire safety requirements include:
- prominent display of evacuation posters, with layout, exit routes, assembly points and evacuation procedures;
  - fire exits and escape routes which are clearly signed, free from obstruction and easily opened;
  - fire extinguishers with adequate instructions on their use;
  - fire alarms on all floors to warn of the need for evacuation;
  - fire doors which meet local legislation and industry standards;
  - regular inspection of fire prevention measures for signs of damage or obstruction, and to check that they are working;
  - regular testing of emergency evacuation procedures in both the workplace and accommodation where present.



- 3.6 The supplier shall have a system and training to prepare for and respond to accidents and other foreseeable emergency situations. There should be mechanisms in place to record, investigate and implement corrective action from any accident and emergency situation.

## 4. Child labour shall not be used

- 4.1 There shall be no recruitment or employment of child labour. No one below the minimum legal age for employment should be employed.
- 4.2 In any given country the minimum working age, will be defined by the conventions of the ILO or national/regional law, whichever affords greater protection to the individual.
- 4.3 If a child is found working directly or indirectly for a supplier, the interests of the child should be the primary consideration. The employer must implement a remediation plan, developing, contributing to, or supporting policies and programmes to assist the child enabling her or him to attend and remain in quality education until no longer a child.
- 4.4 Children and young people under 18 shall not be employed at night, in hazardous conditions or in a way which will interfere with their education or be harmful to their health, safety or physical, mental, spiritual, moral and social development.
- 4.5 The policies and procedures relating to the employment of children shall conform to the provisions of the relevant [ILO standards](#).
- 4.6 Suppliers must have procedures and processes in place to ensure that they do not recruit child labour and that young workers under 18 are protected. All work for young people under 18 must be subject to an appropriate risk assessment and regular monitoring of health, working conditions and hours of work.
- 4.7 Verification of age must be undertaken, and suppliers must have systems in place to guard against the use of falsified documents as proof of age or use of an older person's identification papers.

## 5. Living wages are paid

- 5.1 Wages and benefits paid for a standard working week should meet or exceed national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their wages and employment conditions before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

- 5.3 Deductions from wages as a disciplinary measure are not permitted nor any deductions not provided for by national law without the expressed permission of the worker concerned. Any wage deductions or disciplinary measures must be recorded.
- 5.4 Employees must be paid at regular intervals and on time.

## 6. Working hours are not excessive

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions detailed below, whichever affords the greater protection for workers.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime must be voluntary and not be used to replace additional regular employment. Overtime shall be used responsibly, taking into account the extent, frequency and hours worked by individual workers and the workforce as a whole. Overtime must always be compensated at a premium rate and must meet local law requirements. If no local law exists, the premium rate is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except in the exceptional circumstances where the following are met:
- this is allowed by national law;
  - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
  - appropriate safeguards are taken to protect the workers' health and safety; and
  - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies (production peaks which can be reasonably anticipated do not count as exceptional circumstances).
- 6.5 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period. The supplier shall grant its employees the right to paid annual vacation.

## 7. No discrimination is practised

- 7.1 Suppliers must base their employment practices on the principles of equal opportunity and fair treatment for all. They must not engage in, support or tolerate discrimination in any area of employment.

- 7.2 There must be no discrimination in hiring, employment terms, remuneration, compensation, access to training, promotion, termination or retirement based on race, social class, national or ethnic origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 7.3 Suppliers must not require medical tests or a pregnancy test as a condition of starting or continuing employment, except where required by applicable laws or regulations or where it is necessary for safety reasons. The worker should provide written consent prior to any medical test taking place.
- 7.4 Suppliers should make reasonable adjustments for workers with a disability or chronic illness, including re-arranging working duties, providing opportunities for rest breaks and allowing time off for medical appointments.

## 8. Regular employment is provided

- 8.1 To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, temporary labour, excessive use of fixed-term contracts, home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

## 9. No harsh or inhumane treatment is allowed

- 9.1 Suppliers must treat all employees with respect and dignity. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of mental or physical coercion and intimidation are prohibited.

## 10. Disciplinary and grievance procedures are in place

- 10.1 Suppliers must establish written disciplinary procedures and explain them in clear and understandable terms to workers. All disciplinary and other performance management actions must be recorded and explained to workers.
- 10.2 Workers have the right to trade union or other appropriate representation at disciplinary hearings which may result in significant penalties or dismissal.

- 10.3 Suppliers must provide a grievance mechanism for workers to raise concerns, without fear of reprisal and with an option of anonymity. Grievances must be thoroughly investigated, and feedback and appropriate remedy given in a timely manner. The root causes of any grievances which are substantiated should be understood and learnings integrated into business processes.
- 10.4 The existence and scope of this grievance mechanism must be clearly communicated to all workers, and all workers must have equal access.

## 11. Responsible recruitment for agency and indirect staff

- 11.1 Suppliers are responsible for all workers on their site, whether they are directly employed, or employed or engaged through a labour provider, agent or contractor. Suppliers must have a process to ensure that they have a record of all workers working at their site, and procedures for recording working hours, wage payments and ensuring that employment of these workers meets any local laws.
- 11.2 Suppliers to WHSmith must have written agreements with any third-party labour provider to ensure the rights of those workers are protected. These agreements should include pay and benefits, accommodation where provided, health and safety and all other protections described elsewhere in this document. The supplier should monitor adherence on a regular basis to ensure compliance.

## 12. Protecting the rights of migrant workers

- 12.1 A migrant worker is defined in the International Labour Organization (ILO) instruments as a person who migrates from one country to another with a view to being employed other than on their own account. Migrant workers may be particularly vulnerable to exploitation, trafficking and indicators of modern slavery. The protections for workers laid out in these standards are as equally applicable to migrant workers as they are to local workers.
- 12.2 Suppliers must recruit workers through reputable, and in countries where they exist, government-registered recruitment agencies. All workers must be legally permitted to work in the host country. Suppliers must adhere to the laws of the host country and of the country of origin of the worker.
- 12.3 Migrant workers should not have to pay any fee or other deposit to an agency in order to find work. Suppliers are expected to pay the cost of employment, including recruitment fees, visa fees, fees for work permits and initial travel costs from the country of origin to the host country. These costs must not be charged back to the worker.

- 12.4 Prior to leaving their home country, workers should be provided with their employment contract in their own language, detailing all pay, working conditions and living arrangements. The contract should be between supplier and worker directly, and not the recruitment agency and worker.
- 12.5 In line with paragraph 1.3, migrant workers must not be expected to lodge identify documents with their employer. If workers ask for their documents to be held for safe-keeping, then written permission must be obtained from the employee, and documents should be returned to the worker whenever requested.
- 12.6 Migrant workers must be able to return home at any time without fear of reprisal or incurring unexpected debt. Suppliers must not withhold workers' pay for insurance, bonds, guarantees or similar purposes.
- 12.7 At contract completion, the supplier must pay travel costs for the worker to return home. Any wages, benefits or other remuneration must be paid before the worker leaves the host country.

## 13. Environmental and community impacts are minimised

- 13.1 The supplier shall comply with all relevant legislation and international standards, and in countries where environmental legislation is not evident or enforced, ensure reasonable practices are in place for managing environmental impacts as defined in the following paragraphs.
- 13.2 Suppliers should identify and where appropriate, seek to reduce the environmental impacts of their business activities. An environmental management system should be in place to allocate responsibilities, identify legislation and key environmental impacts, set objectives and targets, ensure policies and processes are in place to manage environmental risks and provide a framework for audit, employee training and corrective actions for continual improvement.
- 13.3 In addition to complying with local laws, steps should be taken to optimise the use of energy and natural resources and reduce the generation of waste and air pollutants. Principles of resource efficiency and circular economy should be adopted to minimise energy, water and raw materials as far as possible. Suppliers should set targets and action plans to decarbonise their activities, in line with the requirement to reduce emissions to minimise global warming to 1.5°C
- 13.4 Waste must be disposed of legally, responsibly and in a way which is not detrimental to the local community or environment. Any wastewater effluents should be subject to appropriate treatment prior to discharge and should meet any local regulatory standards.

- 13.5 Suppliers must obtain, maintain and keep current all necessary environmental permits, approvals and legislation.
- 13.6 Individual and local community rights and title to property must be respected. We expect all suppliers to adhere to the principles of free, prior and informed consent during negotiations with regard to use of and / or transfer of land.
- 13.7 Suppliers must also comply with the Sustainable Forests Policy and Animal Welfare Policy contained in Appendix 1. All products containing paper, board or wood materials must be made from certified materials - FSC (Forest Stewardship Council), PEFC (Programme for the Endorsement of Forest Certification) or other approved certification schemes; or from recycled materials. Vendors must provide sufficient accurate information to WHSmith to demonstrate compliance with a due diligence system as required by UK and EU Timber Regulations prior to any shipments being made and to provide any information WHSmith may require from time to time.
- 13.8 Suppliers of goods for sale in the European Union must also comply with the EU Regulations on Deforestation-free products which require suppliers of products derived from cattle, cocoa, coffee, oil palm, rubber, soya and wood, or any products derived from these commodities, to conduct extensive diligence on the value chain to ensure the goods do not result from recent deforestation, forest degradation or breaches of local environmental and social laws.

## Compliance

One of the primary aims of our approach to responsible sourcing is to facilitate continual improvement in working conditions and environmental performance and we are committed to supporting suppliers who are willing to work with us to achieve this goal. WHSmith is a member of the Ethical Trading Initiative and suppliers are expected to join collaborative efforts to understand the root causes of non-compliances and work towards their elimination. The ETI Base Code, or a similar set of principles must be displayed to workers at each supplier site.

In order to minimise duplication of audits across the sector, we will request that certain suppliers join Sedex (the Supplier Ethical Data Exchange, which is an online system that allows suppliers to maintain data on ethical & responsible practices and allows them to share this information with their customers. They may be a requirement for selected suppliers to share SAQs and audit reports and this will be communicated to the supplier at onboarding or prior to placing a purchase order.

### **WHSmith or InMotion branded products**

We reserve the right to audit, either on an announced or unannounced basis, any factory used for the production of products which carry one of the brands owned by the WH Smith PLC Group of companies. These include, but are not limited, products carrying the WHSmith or

InMotion name, logo or registered address. If access is denied, then no further orders will be placed with the supplier until the situation is resolved satisfactorily.

We expect transparency from all of our suppliers, and all WHSmith employees and / or third-party auditors should be given unrestricted access to premises, workers and relevant documentation. It is the supplier's responsibility to report all production sites and any use of sub-contractors before work begins. If it comes to light, either through inspection arrangements or other reliable sources, that there is more than one factory and it has not been reported to us already, the undeclared site(s) would be audited, and a charge made to the supplier.

Our approach is one of continual improvement, however, there are certain breaches of our standards which will not be tolerated. These include:

- Employment of child labour;
- Use of forced, bonded or involuntary labour;
- Coercion or harassment of workers;
- Unsafe working or living arrangements;
- Illegal working practices.

If serious non-conformances are discovered, then an improvement plan will be agreed, and no further orders will be placed until the issue is resolved to our satisfaction. We reserve the right to cancel orders and / or terminate supplier contracts with immediate effect in extreme cases, or if the supplier refuses to put in place an improvement plan.

We require our suppliers to report any violations of the law or major breaches with these standards. In the first instance this should be with the WHSmith procurement team who placed the order, or through email contact to [sustainability@whsmith.co.uk](mailto:sustainability@whsmith.co.uk).

### **Expectations for third party suppliers**

WHSmith is committed to respecting and protecting the human rights of all individuals who come into contact with its operations. This responsibility extends to all of our suppliers and business partners who must ensure that the human rights of every worker in their supply chain is respected and protected.

All third-party suppliers are required to comply with the requirements set out in these Responsible Sourcing Standards throughout their end-to-end supply chains, including within subcontracted facilities e.g. manufacturing, production and packaging. WHSmith expects third-party suppliers to have their own code of conduct or follow these Responsible Sourcing Standards which protects the basic fundamental human and labour rights of everyone in their supply chains. The code of conduct must address the Ethical Trade Initiative (ETI) base code <https://www.ethicaltrade.org/eti-base-code> requirements and be appropriately enforced in their supply chains. WHSmith may request visibility of policies, supply chain processes and ethical



audits. By being a supplier of WHSmith we expect that you will be able to provide information on reasonable request. As part of our commitment to responsible sourcing and ethical trade, WHSmith has some **minimum requirements that third party suppliers must meet:**

- **Supply chain transparency:** third-party suppliers must have visibility of their supply chain and must maintain records including the names and addresses of all sites where product or major components are manufactured. WHSmith may request the information on a periodic basis.
- **Supplier ethical code of conduct:** third-party suppliers must have their own supplier ethical code of conduct (or equivalent) which covers the basic fundamentals to protect human and labour rights.
- **Human rights due diligence:** all suppliers must comply with human rights due diligence laws applicable to their business. Third-party suppliers must be able to demonstrate their commitment to human rights through policy and procedures, including appropriate due diligence through supplier audit and engagement activities.

WHSmith also expects third-party suppliers to have visibility of their end-to-end supply chain, including where products are manufactured, to monitor their supply chain and implement policies and procedures to identify and address any human rights or labour impacts and remediate where necessary.

### **Responsible Sourcing of Minerals**

WHSmith is committed to ensuring that we are not sourcing minerals (tantalum, tin, tungsten and gold) that fund armed groups and forced labour. We expect suppliers to adopt a policy and exercise due diligence for any tantalum, tin, tungsten and gold in the products they manufacture. This is to take all reasonable measures to ensure that they are sourced in accordance with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk areas, or an equivalent recognised due diligence framework.



# Acknowledgement Form

As the supplier's authorized representative, I hereby acknowledge and agree on behalf of the supplier that I have received and read WHSmith's Responsible Sourcing Standards detailed in this document. I understand the supplier's obligations detailed under the Standards, including those contained in the Appendices, and I confirm, on behalf of the supplier, that we will comply with these Standards and the law, rules, regulations and principles referred to in this document.

By signing this Acknowledgement Form, I also agree, on behalf of the supplier, that WHSmith may audit the supplier to evaluate compliance with these requirements and applicable laws, including those relating to human rights, labour standards, health and safety, the environment and the fight against corruption, to be carried out, with or without notice by WHSmith, or authorised, third-party auditors.

I further understand that failure to comply with any of the WHSmith's Responsible Sourcing Standards or applicable laws may result in WHSmith making demands for corrective actions to be undertaken. In the event of failure to implement agreed corrective actions within an agreed timescale, WHSmith reserves the right to terminate or suspend its contractual business relationship with the company, including the termination of current production of WHSmith merchandise, cancellation by WHSmith of all outstanding orders with the supplier and refusal and return of any shipment of goods from the supplier.

By signing below, I hereby affirm that my company accepts and agrees to abide by the terms set forth in the WHSmith Responsible Sourcing Standards and all applicable laws. I affirm that all actions required to make this certification binding and enforceable against my company have been completed.

Name of company: .....

Address of company: .....

Signed by (name): .....

Signed by (position): .....

Date: .....

Signature: .....

# Appendix

## **Biodiversity and Sustainable Forestry Policy**

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. We are committed to using responsibly sourced raw materials, and to minimising the environmental and social impacts from any of our products that our sourced from forestry products.

The natural resources used most widely by WHSmith are raw materials from timber, pulp and paper for some of our own-brand products and packaging. We also use water in the production of some of our products and packaging. Rising demand for commodities such as paper, pulp, palm oil, beef, leather and soy has driven vast areas of forest clearance.

Eliminating deforestation and the conversion of natural ecosystems and promoting sustainable plantation management practices are important for preventing climate change, preserving biodiversity and providing critical sources of income for local communities. We rely on timber for some of our main products, including our stationery, books and news and magazine ranges. We have a limited number of food products that may contain palm oil. Our customers want assurance that any of our products containing paper, pulp, timber or palm oil are sustainably sourced from known, legal, well-managed and certified sources.

This policy applies to all of our own-brand products sourced by companies operating under the WH Smith PLC group structure including our joint venture businesses, and those sourced by WHSmith franchises. It also applies to non-trade goods, such as office paper, marketing collateral and timber products used in furniture, building and refurbishment programmes. The policy is owned by our Group Chief Executive, and its day-to-day implementation is the responsibility of our sourcing, procurement and quality teams. This policy is part of our wider sustainable business programme, and we are committed to going beyond regulatory compliance.

### **Commitments**

WHSmith is committed to achieving no net deforestation and to eliminating the conversion of natural ecosystems by 2035. All paper, pulp, board, wood and palm oil in our products must be from recycled or sustainable certified sources. We encourage the use of paper, pulp and wood from secondary sources which have been reclaimed, reused or recycled. In particular, none of our products or non-trade goods should contain:

- Forest materials that have been illegally harvested or traded;
- Materials from High Conservation Value Area Forests, Primary Forests or High Carbon Stock forests;

- Materials arising from land clearance, for example by burning or cutting, or from conversion of natural forests or peatlands to plantations;
- Materials from species which are protected by the Convention on International Trade in Endangered Species (CITES) (see [www.cites.org](http://www.cites.org)), or those appearing as Critically Endangered, Endangered or Vulnerable on the International Union for Conservation of Nature and Natural Resources (IUCN) red list ([www.iucnredlist.org/](http://www.iucnredlist.org/));
- Paper bleached with elemental chlorine.

We want to ensure that human rights and livelihoods are protected for those indigenous people and communities local to the places of origin of raw materials. We are committed to the adoption of Free, Prior and Informed Consent principles and any complaints or conflicts should be resolved through open, transparent and consultative processes. Further information on our grievance and remedy processes can be found in our Human Rights Policy, based on the United Nations International Labour Organisation Principles.

The UK and EU Timber Regulations prevent the trade in illegal logging of timber and ensure a legal obligation on anyone who first places forestry products on the UK or EU markets to ensure they know the source of those materials. The EU Deforestation Regulations extend this to cover any products containing or derive from cattle, cocoa, coffee, oil palm, rubber, soya and wood to ensure goods do not result from recent deforestation, forest degradation or breaches of local environmental and social laws. Our aim is always to exceed legislative requirements in our purchasing practices, but as a minimum we expect all suppliers to comply with international and national law.

In addition, we will consider any other interfaces that our value chain may have with nature and any resulting impact on biodiversity and will:

- Engage with stakeholders on biodiversity.
- Conduct a biodiversity risk assessment.
- Require partners in our value chain to commit to avoid operational activities near sites containing globally or nationally important species.
- Define biodiversity-related targets for priority areas to aim for no net loss in biodiversity.
- Apply a mitigation hierarchy of avoidance, minimisation, restoration followed by offsets to reduce any impacts on biodiversity from the activities of our value chain.
- Aim to achieve a net positive impact on biodiversity by 2035.

## Certification

WHSmith supports the use of third party certification to show sustainable production and transparent trade. Certification seeks to provide evidence of legality and sustainability and many schemes have been set up around the world. We believe that any credible certification scheme should:

- Be independent and recognised by environmental groups;
- Be able to trace materials from source through to consumer products;
- Provide a simple logo that is recognised worldwide.

The schemes that we consider to best meet these requirements are those provided by the Forestry Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC), for paper, pulp and timber-based products; and that provided by the Roundtable on Sustainable Palm Oil (RSPO) for palm oil products. Trade suppliers are required to provide certification from one of these schemes for any raw materials that have been derived from timber or from palm oil.

A significant proportion of our paper and wood-based products are already certified, but for a small proportion of product lines, this has not yet been possible. As a minimum we expect our suppliers to know where forest material used in their products comes from and to be able to provide evidence that it has been legally harvested.

**To implement this policy we will:**

- Communicate this policy and associated aims to our suppliers of products containing paper, pulp, board, wood or palm oil and to other interested parties;
- Work with suppliers to ensure that all forest material has been legally harvested and as much of it as possible is certified by FSC or PEFC;
- Work with other sectors such as the publishing industry and food industry to develop and support national and international initiatives to tackle deforestation, and to raise awareness with all stakeholders.
- Integrate our requirements into the purchasing decisions of our business functions.
- Report annually on the proportion of pulp, paper and timber products purchased for sale that are from certified or recycled sources.

Approved by the WH Smith PLC Board: January 2025

## Animal Welfare Policy

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.

We are committed to using responsibly-sourced raw materials, and we believe that no animal should suffer unnecessarily in the production of any of the products we sell. Where animal-derived materials are used in any of our products, we require our suppliers to adhere to the animal welfare standards set out in this policy.

This policy applies to products sourced by all companies operating under the WH Smith PLC group structure including our joint venture businesses, and to WHSmith franchise operations. The policy is owned by our Group Chief Executive, and its day-to-day implementation is the responsibility of our sourcing teams. This policy is part of our wider sustainability programme and we are committed to going beyond regulatory compliance.

### Food lines

For our own-brand food lines, suppliers must be able to demonstrate the provenance back to the farm of any raw materials sourced from animals. We expect our suppliers to adopt high standards of animal welfare throughout the entire supply chain, and to adopt industry best practice standards for rearing, transportation and slaughter based on the internationally recognised Five Freedoms for animal welfare: 1. Freedom from hunger and thirst; 2. Freedom from discomfort; 3. Freedom from pain, injury and disease; 4. Freedom to express normal behaviour; and 5. Freedom from fear and distress. Any meat, poultry, or egg products used in our own-brand food lines will be sourced from suppliers who adhere to defined animal welfare standards.

### Non-Food lines

For any non-food lines sold in our stores, no animals should be slaughtered specifically to produce products; any animal material used must be a by-product of the meat industry, and not originate from animals caught in the wild. The supplier must be able to provide information on the name of the species of animal used (both common and scientific name) and the country of origin from where the animal was derived.

### The following materials must not be used:

- Materials derived from **any endangered or threatened species**, including those protected by the Convention on International Trade in Endangered Species (CITES) (see [www.cites.org](http://www.cites.org)), or those appearing as Critically Endangered, Endangered or Vulnerable on the International Union for Conservation of Nature and Natural Resources (IUCN) red list ([www.iucnredlist.org/](http://www.iucnredlist.org/)).
- **Real fur and pelts**, including angora and other rabbit hair.

- **Ivory, bone, horn, shell and teeth.**
- **Feathers, down, fibres and hair** from the live plucking of birds or animals. Synthetic alternatives are encouraged.
- **Leather and hides** must not be obtained whilst the animal is alive or from aborted animals, and should only be sourced as a by-product of the meat trade. These materials should not be obtained from animals caught in the wild.
- **Beauty and household products** should not be tested on animals, unless products are also sold through other retailers and / or testing is required to comply with local market regulations.

### Marketing and advertising

Any animal imagery featured on products or in advertising must be sensitive to animal welfare issues.

Approved by the WH Smith PLC Board: January 2025

## Restricted Sourcing Countries

This policy applies to products sourced by all companies operating under the WH Smith PLC Group structure including our joint venture businesses and third-party suppliers for own-branded WH Smith products. The policy is owned by our Group Chief Executive, and its day-to-day implementation is the responsibility of our buying and sourcing teams. This policy is part of our wider sustainability programme.

WH Smith's due diligence processes use a risk-based approach to focus resource on geographic areas that have higher potential for social risk and workplace safety non-compliance. We use a number of indicators to assess risk, such as rule of law, control of corruption, fundamental rights and freedom of working people and political stability, including those used by Sedex to assess geographic risk. Whilst these indicators provide the main component of our risk-based approach, WHSmith reserves the right to incorporate other data or risk factors into its risk-based approach. The list will be kept under review and updated if there are any significant changes.

The list of regions/countries we have identified as extremely high risk are shown below. We do not accept goods where the main point of manufacture has been one of the countries listed below.

- Afghanistan
- Belarus
- Burundi
- Central African Republic
- Eritrea
- Haiti
- Iran
- Libya
- Myanmar
- North Korea
- Russia
- Russian occupied regions of Ukraine
- Somalia
- South Sudan
- Sudan
- Syria
- Yemen

WHSmith also prohibits the use of cotton sourced from Uzbekistan, Turkmenistan and the Xinjiang Uyghur Autonomous Region in products supplied to us.

Approved by the WH Smith PLC Board: January 2025