

WHISTLES

Whistles Modern Slavery Act Transparency Statement

Whistles Modern Slavery Act Transparency Statement for 2018. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps Whistles has taken during the 2017/2018 financial year (the “Year”) to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business, and the additional steps we plan to take in 2018.

Modern Slavery

About 150 years after most countries banned slavery millions of men, women and children are still enslaved. Contemporary slavery, as defined in the [1956 UN supplementary convention](#), takes many forms, including debt bondage, servitude, child slavery, forced labour and human trafficking. Slavery thrives on every continent and in almost every country. Forced labour, people trafficking, debt bondage and child labour are all forms of modern-day slavery that affect the world’s most vulnerable people.

Whistles is committed to respecting, protecting and advocating for the [human rights](#) of all the stakeholders who are involved in our own operations. As such we accept that is our responsibility to support transparency and integrity, to be proactive in resolving problems and to collaborate with others to protect the human and labour rights of workers.

About Whistles

Our Business Organisation:

Whistles is a multi-channel fashion brand based in London, selling apparel, footwear and accessories for the contemporary woman and man.

Whistles is based in the UK, with a head office in London and additional customer services team in Rochester. The Whistles distribution centre is located in Milton Keynes.

We operate in 11 territories across the globe through wholesale, concessions, solus sites, franchise partners and online. We employ 716 people, with 694 employees in the UK and ROI across our 43 stores and 66 concessions, 111 in Head Office and 22 in the USA.

Location	Number of employees
Head Office - London	111
Stores (across the UK)	382
Concessions (across the UK)	168
Stores – Ireland	33
Stores – US	22

Our product is manufactured across 18 countries. We have an active supply base of 128 manufacturing sites comprising 97 factories through 55 suppliers, 23 factories through agents, and 8 factories through other brands that we sell in-store. Our top 5 sourcing countries are China, Portugal, Turkey, India and Mauritius.

Our Supply Chain

Our supply chain is divided into two channels:

- a. Products for re-sale online and in stores, including Whistles branded products and other third party brands' products.
- b. Non stock items and services, including outsourced customer deliveries, logistics, IT, cleaning, customer care and catering.

We design our own brand's products in our head office in London which are manufactured by third party factories.

The sourcing department (comprised of Technical, Buying, Merchandising and Design) manages the Whistles brand supply chain. The CSR and Sustainability Executive sits within this department to ensure that product and raw material suppliers are selected based on ethical and sustainable credentials together with commercial criteria.

Whistles non-stock products and services are managed by our Procurement Team, supported by the CSR and Sustainability Executive, as well as the Legal team.

Whistles has an established Modern Slavery Working Group, set up to drive the modern slavery agenda forward across all departments, looking at both supply chain channels. The modern slavery working group carries out a risk assessment across our manufacturers, non-stock suppliers, and Whistles direct employers.

Whistles supply chain is defined as follows:

Tier	Definition	Example	Status
1	Main Production Sites	Factory that cuts, makes and trims Whistles products and ships to Whistles	Fully mapped
2	Primary Process Subcontractors	Provider of one or more processes e.g. stitching, cutting, packing, QC and shipping to Whistles	Fully mapped
3	Secondary Process Subcontractors	Provider of one or more processes e.g. stitching, cutting, packing, QC and shipping to Whistles	Partially mapped
4	Fabric and Components	Fabric mills, tanneries, hardware and trims	Partially mapped
5	Raw Materials	Textile fibres, natural and synthetic materials	Not mapped

Our Policies

As part of our ever evolving ethical trading strategy based on the UN Guiding Principles on Business and Human Rights (UNGPs) and the ETI Human Rights Due Diligence Framework, we have developed our operational policies with the view of respecting, protecting and remedying the human and labour rights of all that work on our behalf.

Whistles core policies relating to our commitment to adopting the UNGPs, to benefit all those who work on behalf of Whistles are our Supplier Code of Conduct, the Migrant Workers Employment Policy and Implementation Guidelines and the Young Worker and Child Labour Policy.

Our Supplier Code of Conduct (“Code of Conduct”) is aligned with the Ethical Trading Initiative (“ETI”) base code, with elements of the SAI SA1000 Standard:2014. It outlines the minimum social and environmental standards we expect each factory to meet and our expectations regarding the conditions in which our products should be manufactured.

Our Migrant Workers Employment Policy and Implementation Guidelines set out the supplier requirement to protect, respect and remedy the rights and welfare of migrant and contract workers, some of the most vulnerable to exploitation and modern slavery. Within this policy, Whistles endorses the Employer Pays Principle, which reflects the Dhaka Principles for Migration with Dignity.

Our Young Worker and Child Labour Policy prohibits the recruitment of child workers in our supply chains and outlines remediation guidelines.

Finally other policies that are also related to the prevention of modern slavery are our Anti Bribery Policy, Whistleblowing Policy, Equal Opportunity Policy and our Compliance Handbook.

Due Diligence

Our Governance

The Managing Director and Whistles Board of Directors are responsible for ensuring Whistles meets its human rights responsibilities. They are supported by the CSR and Sustainability Executive and the Sourcing team.

Our Risk Assessment and Management

Whistles has identified the key elements that pose a risk of modern slavery in our supply chain. As such we are conducting analysis of areas of our business where there is migrant labour, high presence of refugees, young workers and a risk of the use of child labour, contract and temporary workers, women workers, outsourced recruitment agencies.

We recognise that certain countries within our own operations may have one or more of these modern slavery risks and as such we have divided them into three different categories of high, medium and low risk and allocated appropriate priorities. This differentiation was based upon assessing causes and contribution, direct and indirect impacts as well as level and influence.

Our priority focus is currently on product manufacture. As such we have developed specific policies and tools which allow us to investigate further where issues arise.

As part of our risk assessment and management, we partner with specialists on the ground to further investigations with our suppliers or to raise awareness of potential risks. At the same time Whistles values its partnerships with key NGOs, suppliers, other brands and multi stakeholder initiatives, working together on pre-competitive ground to find a common solution to salient issues.

Mapping our supply chain is an essential piece of work in managing and mitigating risks. In 2016 we started the mapping of our supply chain, which allowed us to gain visibility of all our tier 1 suppliers. Although we acknowledge that it is in the nature of supply chains to be continuously evolving, we are working towards establishing long lasting relationships with our existing suppliers and the aim for 2018 is to focus on mapping our supply base beyond Tier 1.

Actions taken

During our due diligence process we have identified key modern slavery risks where we directed our attention.

Modern Slavery Risk	Definition of Issue	Steps Taken	Whistles Commitment
Migrant Labour	<p>Migrant workers paying recruitment fees might be trapped in bonded labour and be subjected to substandard employment terms</p> <p>Recruitment agencies are often in between the employer and the worker, leaving the worker at risk of deceptive or coercive recruitment practices</p> <p>It is often difficult for migrant workers to understand their rights and terms of employment</p> <p>Countries of highest risk for Whistles are: Mauritius, China and Turkey</p>	<p>Developed our Migrant Workers Employment Policy and Implementation Guidelines</p> <p>Conducted an extensive impact assessment of our Mauritian factory</p> <p>Joined ETI Mauritius Migrant Labour caucus group</p> <p>Participated on the event <u>'Migrant Workers: Driving Collaborative Approaches Towards Responsible Recruitment'</u> in Mauritius, bringing together key stakeholders to discuss challenges in managing labour migration, and agree on a common framework for improving worker protection in Mauritius and beyond.</p>	<p>Further our commitment to map and carry out a risk assessment of migrant labour across our supply chain</p> <p>Identify and collaborate with specialist NGOs to further our migrant labour programme</p> <p>Continue collaborating with ETI members on migrant labour issues</p>
Refugee Labour	<p>Refugees are particularly vulnerable to exploitation and trafficking, as well as forced labour and debt bondage</p> <p>Often they don't have access to legal aid or support on the ground, making them more vulnerable to exploitation</p> <p>We identified our main risk in Turkey</p>	<p>Collaborated with ETI to develop a robust framework on exploitation and discrimination of refugees in Turkey, looking at issues such as purchasing practices, social dialogue and business and human rights</p>	<p>Continue to participate in ETI Turkey Working groups</p> <p>Identify and collaborate with specialist NGO to further our Turkey country programme and provide awareness training to our suppliers</p>

Child Labour and Young Workers	<p>Children and Young Workers are more vulnerable to exploitation and contemporary forms of modern slavery, also due to lack of robust HR practices to ensure their age</p> <p>Countries of risk identified: Turkey and India</p>	<p>Added robustness to our Child Labour and Young Worker policy and communicated this to all our suppliers</p>	<p>Continue to participate in ETI Turkey Working groups</p> <p>Identify and collaborate with specialist NGO to further our Turkey country programme and provide awareness training to our suppliers</p> <p>Conduct further risk assessment of our supply chain to understand where hot spots for child labour exist and the type of unit</p>
Contract and Agency Workers	<p>There is insecurity in the status of contract workers, which leaves them more vulnerable to exploitation</p> <p>Recruitment agencies create an additional layer between workers and the employer and don't guarantee a great deal of transparency, as well as potentially exposing workers to exploitative practices</p> <p>Areas of risk identified are Turkey, India and UK</p>	<p>Developed our Migrant Workers Employment Policy and Implementation Guidelines</p> <p>Developed a modern slavery risk assessment for our supply chain and our distribution centre</p> <p>Collaborated with a leading NGO to develop training programmes on modern slavery for our DC</p>	<p>Further our risk assessment of supply chain to identify where other potential risks lie, including home workers</p> <p>Continue our collaboration with leading NGO to extend awareness to our supply chain</p>

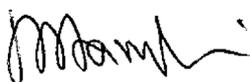
Training

The Modern Slavery Act has been an opportunity to embed a greater understanding of human rights within our product supply chain and to extend the awareness of the issue internally across departments. All of our heads of departments have been briefed, and engage in regular discussions on human rights and modern slavery through our Modern Slavery working group. We brought on board our distribution centre to be part of the wider discussion.

Next Steps

We commit to collaborate further with industry peers, NGOs, trade union and through our multi-stakeholder dialogue to address issues that are at the root cause of contemporary slavery and human rights breaches. Moving forward we will extend the breadth and depth of our approach to include non-stock suppliers and risk assessment of other sourcing regions. Our aim is to further strengthen and promote our core values of fairness, integrity, transparency and collaboration, and as such we will be updating this statement annually.

Whistles Modern Slavery Statement was prepared by Whistles Modern Slavery Working Group and approved by Whistles Board of Directors on 28th March 2018.



Justin Hampshire on behalf of the Board of Directors
Managing Director