



# MODERN SLAVERY STATEMENT 2025



## **Our Commitment**

At Whittard of Chelsea, we take great pride in our products, the people who bring them to life, and the places where they are produced and sold. Whether individuals are employed directly through our stores or one of our global offices, or through third party relationships we recognise and value the critical role they all play.

We are unwavering in our belief that every person has the fundamental right to work in a fair, safe, and healthy workplace. Our commitment to respecting human rights, upholding fair labour standards, and fostering safe and healthy working environments is at the heart of how we do business, and we will not compromise on these principles.

In 2022, we commissioned the Slave-Free Alliance (SFA) to conduct an external review of the existing modern slavery prevention provisions within our organisation. Over the past three years we have focused on improvements from this review.

We have recently engaged with the SFA to conduct a benchmarking and horizon scanning project in January 2026.

The goals of this project are to:

- Identify areas of risk for focus on human rights and modern slavery.
- Understand upcoming legislation and emerging trends.
- Identify and address compliance gaps with legislation across the UK, USA, and Asia.
- Build on and review the findings of the previous SFA report.

This Statement is published in accordance with Section 54 of the Modern slavery Act 2015 and sets out the steps we have taken for the period from July 2024 to June 2025.

This Statement was approved by the Board of Whittard Trading Limited.

A handwritten signature in black ink, appearing to read 'N. Smith'.

**Nathan Smith**

**CEO – Whittard Trading Limited – t/a Whittard of Chelsea.**



## **Our Company:**

Our story began in 1886, when Walter Whittard began selling the finest tea, coffee, and hot chocolate in London with the approach to buy the best. Over 135 years later, our never-ending curiosity to find unique blends and distinctive tastes lives on at Whittard. We continue to flourish, and our ambition will always remain the same – to ensure every customer can enjoy their own Whittard moment and make each day more special.

## **Introduction:**

This Statement is made pursuant to The Modern slavery Act 2015 and sets out the steps that Whittard Trading Ltd takes, to ensure the detection and prevention of slavery and human trafficking within our business and supply chain.

In 2015, the UK government introduced legislation that requires all businesses operating in the UK, with a turnover greater than £36m, to produce an annual statement detailing activities performed in the past year to eradicate modern slavery within their organisation and supply chain.

## **The reporting period for this Statement is July 2024 to June 2025**

## **Our structure, and operations**

We are a medium-sized business specialising in tea, coffee, hot chocolate, confectionery, and other complementary products like ceramics and equipment.

Our Head office is based in Oxfordshire, with a satellite office based in London. Globally, we have offices in the USA, Hong Kong and China.

Our routes to market include over 40 UK retail outlets, a global ecommerce platform, international franchise partners, and global wholesale relationships. As of June 2025, we have 491 employees based in the UK and 6 based in our locations in the USA and Asia.

## **Business Risk register**

We are committed to addressing modern slavery in all its forms within our operations and supply chains. We recognise that modern slavery poses significant risks to our business, reputation, and the broader ethical and social landscape. By proactively tackling these risks and taking the appropriate actions, we not only fulfil our moral obligations but also unlock potential benefits that contribute to the long-term sustainability of our business.



We recognise that modern slavery represents a multifaceted risk. By acknowledging its presence on our business risk register, we not only safeguard our operations but also harness the benefits that come with responsible and ethical business practices. We are dedicated to implementing measures that contribute to eradicating modern slavery and ensuring a more equitable future for all.

The leadership team reviews the business risk register quarterly, with a standalone modern slavery risk assessment planned for completion by end-2025, aligned to the OECD framework for responsible business conduct and due diligence.

### **Our Supply Chain**

In areas of our operations under direct control, including our supplier and franchise partners, our commitment is to provide a good place to work. By complying with local laws and avoiding practices that could lead to inadvertent labour abuses we ensure that the risk of modern slavery remains low.

We work with a diverse global network of suppliers, with sourcing regions varying by commodity type. Whilst we typically buy through wholesalers and distributors our commodities are grown in many different regions, including:

- Tea: India, China, Indonesia, Sri Lanka, and Kenya.
- Coffee, primary sourcing regions are Brazil and Guatemala, followed by Indonesia, Central America, and India.
- Cocoa: West Africa, South America Mainly Cameroon, Coted'Ivoire, Ghana, Guine, Liberia, Nigeria, Peru, Sao Tome and Principe, Sierra Leone, Toga.

These regions provide the high-quality raw ingredients essential to our products. Given that these ingredients are procured from diverse regions, often involving complex and multi-tiered supply chains, we recognise that our sourcing activities inherently carry the highest risk for modern slavery, forced labour, and other human rights abuses.

While we do not purchase directly from farmers, we recognise that the conditions under which they operate are among the most vulnerable stages of the supply chain. Factors such as informal labour practices, lack of oversight, and socio-economic challenges within farming communities contribute to these risks. We are committed to work closely with our suppliers to ensure that robust human rights and labour standards are upheld throughout the supply chain, with particular attention to protecting the rights and well-being of farmers and their communities. Currently this is delivered through our risks assessments as outlined below.

Farming has been identified and recognised as a high-risk area for tea, coffee and Cocoa. Current visibility is limited beyond our tier one suppliers, and a comprehensive understanding back to farm level is not yet established. We are working with our tier



one suppliers to address this by enhancing supply chain mapping and strengthening transparency in these areas.

Our knowledge of non-goods-for-resale (GNFR) supply chains is also incomplete. To address these gaps, we are working with the SFA on a project aimed at improving supply chain mapping and understanding in this area.

### **Due Diligence: Risk Assessment and Management**

Our buying and technical teams actively engage with tier one suppliers through regular contact, including bi-annual face-to-face meetings. Supplier performance is monitored and reviewed monthly, and all contracts include a clause addressing modern slavery.

Our due diligence approach involves conducting a risk assessment of our suppliers based on various factors such as geographic location of supply, the nature of the workforce, and the structure of the supply chain. We then assess the risk into three categories, high, medium and low. The first risk assessment took place in July-24, and this will be reviewed annually. In addition, our approach also includes supply chain mapping, monitoring, engaging suppliers directly, training and collaboration.

We require our suppliers to register on Sedex and complete a self-assessment or recognised social audit, such as (Sedex Member Ethical Trade Audit (SMETA) or Business Social Compliance Initiative (BSCI). These measures, supported by supplier engagement provide baseline insights into social, economic, and environmental conditions, enabling us to assess compliance, address risks, and align with legislation.

We are working closely with partners such as the Ethical Tea Partnership (ETP) to outline our tea origin mapping and its risk mitigation plan.

We also partner with Safe Call, who manage our Whistleblowing platform. Currently, we use this for our own employees, however our plan is to extend this to our supply chain in 2026.

We remain committed to regularly reviewing and strengthening how we work with all stakeholders to support the long-term sustainability, ethical conduct and integrity of our business.

### **Recruitment Policy/Processes**

During 2025, we implemented a new Applicant Tracking System (ATS) to support our recruitment policies and procedures, enhancing transparency and compliance in our hiring processes. As part of this project we also reviewed all our recruitment policies.



## **ESG Strategy and Commitments**

Our Environmental, Social, and Governance (ESG) strategy prioritizes anti-slavery responsibilities, and we are committed to fostering an anti-slavery culture throughout the organisation.

Quarterly governance meetings on Modern slavery are chaired by the Chief Executive Officer and led by the Head of Human Resources.. The meetings are attended by the Chief Finance Officer, Marketing & Product Director, International Director, and representatives from the Buying, Technical and Marketing teams. Responsibilities include setting strategy, reviewing risks, monitoring supplier compliance, and overseeing improvement actions.

We use the United Nations Guiding Principles on Business and Human Rights to underpin our ESG responsibilities,

We work with key partners to support our commitments, including

- Slave Free Alliance (SFA)
- Ethical Tea Partnership (ETP)
- World Coffee Research (WCR)
- British Retail Consortium (BRC)
- Safe Call – Whistleblowing platform.

Membership provides both strategic support and community impact.

The SFA is currently leading a risk assessment across our GNFR (Goods Not for Resale) supplier base to help us better understand potential risks, including labour standards, environmental practices, and broader supply chain resilience. The findings will form the foundation for our GNFR Policy, ensuring it is both robust and practical, and will guide how it is applied consistently across our supplier network.

We work with external partners to support supply chain mapping in relation to modern slavery risks, though we are not currently affiliated with technology providers, NGOs, trade unions, or government agencies.

## **Internal Operational Policies**

Our internal operations policies provide the framework for ensuring that our business is conducted ethically, transparently, and in full compliance with modern slavery legislation. These policies set clear expectations for our employees, contractors, suppliers and partners, outlining responsibilities, reporting mechanisms, and safeguards to prevent exploitation. By embedding these standards into our day-to-day operations, we aim to foster a culture of integrity and accountability.



We are currently revising key operating policies related to modern slavery, including the Human Rights Policy, Supplier Code of Conduct, Employee Code of Conduct, and Business Code of Conduct, aligning them with the UN Guiding Principles on Business and Human Rights. While these policies are referenced within this Statement, specific criteria and detailed provisions relating to modern slavery are not fully outlined. Once revised, the policies will clearly address key protections and obligations. This work will be completed by the end of 2025.

### **Whistleblowing Policy**

We have a Whistleblowing Policy for colleagues to use when they see or suspect serious concerns or wrongdoing. Modern slavery is included in the policy, giving employees the platform to report in the correct manner and have assurances that any concern reported will be treated confidentially.

Our partner, Safe Call, provides access for our employees to report anonymous disclosures. Employees have the choice of using a dedicated hotline or making a report through a standard web portal. There are 100+ language options to choose from, and employees can choose to remain anonymous. .

Since the line was launched in 2024, we have not received any reports relating to modern slavery.

We are exploring opportunities to enhance our whistleblowing process by extending access to our suppliers. This initiative is currently under review and will align with the launch of the revised Business Code of Conduct and Supplier Code of Conduct.

### **Policy Committee**

The Policy Committee, chaired by the Head of Human Resources, reviews and approves all policies, seeking Director-level approval where required. Policies are communicated via the Employee Handbook and shared with suppliers as appropriate. Collaboration with internal teams, suppliers, and partners ensures alignment and effective implementation.

### **Modern Slavery Training**

In 2024, our leadership team participated in a Modern slavery Awareness course delivered in collaboration with the SFA. The training emphasised the critical importance of modern slavery monitoring, outlined leadership responsibilities, and provided practical guidance on identifying and reporting potential concerns across all business activities. We will repeat this training every 2 years.



In 2025, we launched a comprehensive internal training programme to strengthen awareness of modern slavery and reinforce reporting procedures across staff at all levels in the organisation. This training is delivered online, and we track monthly completion rates, which as of June 2025 was 90%.

To further support our Buying and Technical teams, we will ensure that they undertake specialist, role-specific training within the twelve months to deepen their understanding and ability to identify and address modern slavery risks in our supply chain.

We will continue to revise our training and awareness across the business aligned to any policy or regulatory changes.

## **Monitoring and Evaluation**

### **Purpose of Monitoring and Evaluation**

Monitoring and evaluation are central to ensuring our modern slavery programme is effective, targeted, and continuously improving. Through annual reviews of our policies, due diligence processes, supplier engagement, and training, we assess risk reduction across our operations and supply chains, identify gaps, and take corrective action. This process enables us to address weaknesses, enhance our practices, and adapt to emerging risks, providing transparency and evidence of progress in line with the UK Modern slavery Act 2015, and reinforcing our ongoing commitment to responsible and ethical sourcing.

### **Methods and Data Sources**

Our modern slavery programme includes audits, supplier assessments, whistleblowing channels, and engagement activities to monitor risks, with further enhancements expected from our 2026 audit. This includes data consolidation, benchmarking against industry standards, and establishing key metrics to track progress.

### **Stakeholder Roles**

Our modern slavery programme actively engages internal and external stakeholders. Internal teams collaborate to manage risks, deliver training, and ensure compliance. Externally, suppliers, business partners, and industry bodies (e.g., SFA, ETP) provide feedback, benchmarking, and verification. All activities are overseen through our ESG governance committee meetings. Looking ahead, we will strengthen engagement by expanding supplier collaboration, enhancing partner feedback mechanisms, and improving internal coordination to support more effective monitoring, risk mitigation, and continuous improvement.

### **Findings and Outcomes**





As part of our annual review, we identified that a modern slavery clause was not included in our supplier contract. This was addressed and circulated to all existing suppliers, whilst also updating the template for onboarding new. We always assure that modern slavery is a key consideration in supplier approval and have rejected onboarding a new supplier due to the fact it was not willing to comply and sign-up to our modern slavery clause.

### **Our future focus**

We remain committed to ensure that we operate in a fair, safe, and healthy workplace. Our commitment to respecting human rights, upholding fair labour standards, and fostering safe and healthy working environments is at the heart of how we do business, and we will not compromise on these principles.

### **Strategic Priorities for 2025–2026**

#### **1. Global Supply Chain Transparency**

**Objective:** Establish a robust and clear understanding of human rights and modern slavery risks across our operational footprint.

**Actions:**

- Launch the SFA-led benchmarking and horizon scanning programme in January 2026, covering the UK, USA, and Asia.
- Identify priority risk areas, anticipate emerging legislation, and close compliance gaps in key geographies and among suppliers.
- Integrate insights from this year's Modern slavery Statement review to ensure targeted interventions.

**Success Indicators:**

- Completion of initial benchmarking report by Q3 2026.
  - Risk mitigation plans in place for all high-priority regions by end of 2026
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#### **2. Enhance GNFRS Governance and Transparency**

**Objective:** Strengthen oversight and ethical standards in the Goods Not for Resale (GNFRS) category.

**Actions:**

- Undertake a risk assessment and define the roadmap and actions required to strengthen supplier compliance and improve transparency within procurement processes.
- Establish clear accountability and monitoring mechanisms.

**Success Indicators:**

- 100% of GNFRS suppliers assessed against updated ethical criteria by Q4 2026.
  - Annual GNFRS compliance review integrated into procurement governance cycle.
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### **3. Embed Human Rights into Core Governance Frameworks**

**Objective:** Align our corporate policies with global best practice to ensure a consistent, rights-based approach to operations and partnerships.

**Actions:**

- Finalise and implement the Human Rights Policy, Supplier Code of Conduct, Employee Code of Conduct, and Business Code of Conduct by the end of 2025.
- Align all policies with the UN Guiding Principles on Business and Human Rights.
- Use policy rollouts to engage employees, contractors, suppliers, and partners on our modern slavery commitments.

**Success Indicators:**

- 100% of employees trained on updated policies within 6 months of launch.
  - Annual policy review cycle embedded, with measurable improvements in awareness and compliance.
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### **4. Strengthened Monitoring, Evaluation and Stakeholder Engagement**

**Objective** Enhance the effectiveness, accountability, and continuous improvement of our modern slavery programme by integrating robust monitoring and evaluation processes with strengthened stakeholder engagement

**Actions:**

- Consolidate supplier assessments, whistleblowing reports, and partner feedback into a unified system.
- Benchmarking: Compare performance against industry standards and external datasets.
- Stakeholder Engagement: Strengthen collaboration with suppliers, partners, industry bodies (e.g., SFA, ETP), and internal teams (buying, technical, human resources, ESG group).
- Governance Oversight: Review all activities through ESG governance meetings.

**Success Indicators:**

- 90% of suppliers with up-to-date risk assessments.
- Volume and resolution rate of whistleblowing reports.
- Instances where external benchmarking informs risk mitigation.
- Evidence of improved internal coordination and supplier engagement
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**Collaboration and impact:**

Utilise benefits provided by membership of third-party organisations to create an impact within our business and supply chains.

**Support from Our Leadership:**

This report keeps our leadership team informed on modern slavery, raising awareness so they and their teams remain vigilant, uphold their responsibilities, and lead by example in fostering an inclusive and ethical workplace.