



MODERN SLAVERY STATEMENT 2020



This statement is made pursuant to The Modern Slavery Act 2015 and sets out the steps that Whittard Trading Ltd has taken and will continue to take, to ensure the detection and prevention of slavery and human trafficking within the business and its supply chain.

Introduction

This is the third statement that Whittard Trading Ltd has published.

The statement reviews the progress in the last twelve months and defines our objectives for the following year.

Business Overview

Whittard Trading Ltd is a medium sized business based in the UK, with a head office in Didcot, Oxfordshire.

We are predominantly a retailer of own brand tea, coffee, hot chocolate and confectionery, as well as ceramics and equipment lines to support the core categories.

We have 44 retail outlets in the UK and franchise partners operating in international locations worldwide. We also trade our products with other independent 3rd party retail and food service customers, both in the UK and internationally.

Our direct supply base is small, located in the UK and mainland Europe. Our indirect supply base is more diverse, with ingredients being sourced from worldwide origins including China, India, Africa and South America. We also purchase ceramics and drinks equipment from across Asia.

Activity Overview

The activities described in this statement relate to the period between December 2019 and the date of publication. In this time, we have further risk assessed our supply base, programmed training for all stakeholders, and gathered information about training programmes.

Risk assessment

Modern slavery is a complicated issue and worldwide, is hidden and difficult to detect.

As a company involved in the procurement of raw ingredients internationally, including from the developing world, we recognise that this represents a challenge, and the focus of our activity is the detection and prevention of modern slavery in our supply chain through an ongoing process of risk assessment.



Governance

The CEO retains ultimate responsibility for ensuring that Whittard Trading Ltd monitors human rights risks and takes mitigating action.

The measures we already have in place to protect food safety and integrity, overlap with modern slavery.

Our activity to date has been to explore our supply chain risks, considering geographical and supplier specific aspects and identify mitigation.

To date, we have not identified any examples of modern slavery, human trafficking or any other human rights abuses in our supply chain or within our retail operations.

2020 progress:

- We have reviewed internal policies and procedures to ensure comprehensive alignment with modern slavery controls.
- We have developed a timeframe for the implementation of retail and head office staff training on Modern Slavery and Human Trafficking.
- Engaged with key product suppliers in sharing our modern slavery statement and gaining responses to our modern slavery questionnaire. Results and analysis of which are held on file.

Training

We have committed to developing a staff training programme on Modern Slavery and Human Trafficking to include:

- The basic principles of the Modern Slavery Act 2015
- How to recognise the risks in our purchasing practices and supply chains
- How to spot signs of Modern Slavery
- How to report potential breaches and understanding whistleblowing

In terms of our supply base, we are gathering information about approaches to training on modern slavery and trafficking risks.



2021 and future plan:

- We will document a modern slavery policy and strategy for issue to our suppliers – end of 2022
- We will investigate opportunities to join other ethical schemes that correlate with modern slavery controls e.g. B Corp – end of 2022
- We will propose solutions for educating our suppliers in the core elements of modern slavery controls, particularly, in territories where there is currently no equivalent to the Modern Slavery Act 2015 – end of 2022
- We will conduct a review of all policies and training programmes in relation to Modern Slavery and Human Trafficking – end of Q2 2022
- We will roll out Modern Slavery and Human Trafficking training across the whole organisation in line with the proposed timetable – end of Q2 2022
- We will adopt awareness raising methods such as poster campaigns, indicating how to report slavery or trafficking concerns – end of Q2 2022
- We will raise awareness across all locations highlighting our key policies and helplines – end of Q2 2022
- Roll out the questionnaire to all suppliers and analyse results – end of 2022.

This statement has been approved by the Directors of Whittard Trading Ltd.

Signed:

Date