

Modern Slavery Act Transparency Statement

2016-17

Whistles is a contemporary fashion brand based in London. We are committed to conducting business within the spirit of ethical standards, and to having a positive impact on our stakeholders and those who work at Whistles.

Whilst we are in the early stages of our corporate social responsibility journey, we firmly believe the work we have started reflects our commitment to providing those that work for us with dignified work and we have put human rights and higher labour standards at the centre of our programme.

The complexity of modern slavery allows it to exist in many forms and greater transparency will allow us to identify risks and prioritise how to approach the issue in the most effective way.

This transparency statement sets out some of the steps that Whistles has taken to ensure that modern slavery and human trafficking are not present in our business operations and supply chains. It covers the financial year ending 31 March 2017 and has been published in accordance with the Modern Slavery Act 2015 (the “Act”).

WHISTLES

Our Business Organisation and Supply Chain

Whistles is a UK-based multi-channel brand. We operate in 11 territories across the globe through wholesale, concessions, solus sites, franchise and web. We employ **729** people, with **552** employees in the UK across our **49** stores and **29** concessions, **102** in Head Office and **75** in our international stores across Europe and the USA.



Our product is manufactured across **19** countries. We have an active supply base of **134** units comprising 102 factories through **98** suppliers, 23 factories through agents, and **9** factories through other brands that we sell in-store. Our top **5** sourcing countries are China, Portugal, Turkey, India and Romania.

WHISTLES

Our Policies

In addition to the Whistles code of conduct, in 2016 we developed the following policies which are also relevant to the Act and which will be implemented and published 2017. They are:

The Whistles Buying Policy

The Whistles Human Rights Policy

These policies are designed to support ethical sourcing and labour standards and are based on the ILO labour standards, the UN Declaration on Human Rights, and the Guiding Principles for Business and Human Rights.

Our Supplier Code of Conduct (“Code of Conduct”) is aligned with the Ethical Trading Initiative (“ETI”) framework and 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.

The Code of Conduct explicitly states that Whistles expects all employment to be freely chosen and working conditions to be safe and hygienic. Child labour is prohibited, living wages are to be paid, working hours should not be excessive and workers should not be subjected to harsh or inhumane treatment.

We ask all suppliers to sign our Code of Conduct, and we ask them to obtain the same from their sub-contractors to maintain consistent labour standards across all aspects of production. The supplier is responsible for ensuring that the Code of Conduct is implemented and adhered to by all of its approved subcontractors and business partners.

We will only do business with suppliers that share our commitment to fair and safe labour practices and who sign up to our Code of Conduct.

Our Anti-Bribery and Corruption Policy, Equal Opportunities Policy and Whistleblowing Policy sit alongside the Code of Conduct and we expect our suppliers to implement these policies as if they were their own.

WHISTLES

Our Risk Assessment and Management

Whistles sees the mapping of the supply chain as an essential piece of work in managing and mitigating risks. In 2016 we carried out a supply chain mapping exercise and now have visibility of all of our first tier suppliers. We acknowledge that the supply chain is constantly moving as new suppliers are added in line with our growth and some suppliers are removed. Therefore, we plan to review this on an annual basis and we will expand this process to encompass second-tier suppliers involved in processes such as printing, embroidery and finishing.

Factory Audits

We review our first-tier factories at source on an annual basis, either by carrying out Whistles ethical audits or third party social audits through SEDEX. As members of ETI we use a public methodology called SEDEX Members Ethical Trade Audit (SMETA) as the basis for our audits.

All suppliers and factories undergo ethical audits and social compliance reviews prior to their engagement. Each season we review the compliance of our key suppliers with respect to the commercial and ethical criteria we set. We share our findings with our suppliers and highlight areas which should be addressed in order to improve performance.

When issues occur, we highlight these to the Suppliers and work with them to help resolve any non-conformance in a timely manner.

Though monitoring may highlight the issues occurring at a factory level we acknowledge that in order to solve such issues we need to identify and address the root causes behind them. Being a member of the ETI gives Whistles the opportunity to collaborate and work with other brands, organisations, NGOs and Trade Unions to identify and address the root causes that lead to problems at factories.

The SEDEX platform enables members to report on trends across the supply chain and to liaise with one another where indications of forced or bonded labour arise so that these can be followed up.

WHISTLES

Corporate Social Responsibility Working Committee

In 2016 we set up a Corporate Social Responsibility Working Committee comprising members from a range of departments in the organisation, including Technical & Compliance, Logistics, Buying, IT, Legal, Brand, HR and Communications. The committee meets on a monthly basis and provides us with the opportunity to explore and discuss matters of corporate responsibility at management level. The outcomes of these meeting are communicated to all appropriate levels and areas of the business.

Training

Training on ethical buying, social compliance and factory engagement programmes was issued to the buying, design and senior management teams within Whistles' Head Office. This will be repeated in 2017.

WHISTLES

Our next steps

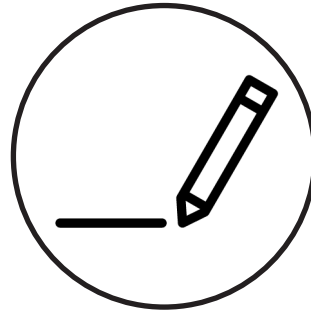
The next steps for us as an organisation will be:



Create remediation policies on Child labour and Modern Slavery.



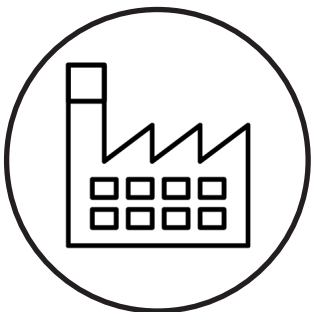
Collaboration work with external peers to effect change at factory level.



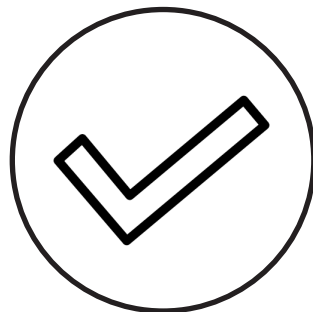
Focus on two key projects: Cotton Pledge and Turkey Syrian Crisis.



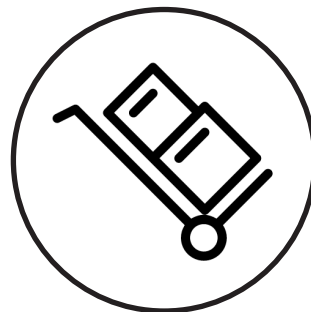
Use ETI framework on Human Rights due diligence to support our CSR program and employment rights of workers in Turkey.



Develop a strategy that includes clear targets for managing labour standards and human right in the supply chain, and monitors on-going progress against these targets.



Monitor and report the number and proportion of direct suppliers that have a valid social compliance audit from the last year, and records suppliers in full compliance with the relevant social standards.



Ensure labour standards and human rights' training is provided to supplier's management teams, and maintains records of training coverage through Supplier Workshops.



Initiate and organise capacity building projects relevant to its supply chain, and maintains learning and feedback mechanisms to ensure that the lessons learned are built into the brand activities on labour standards and human rights.

WHISTLES

Whistles remains committed to working towards the elimination of Modern Slavery and will continue to take steps to mitigate the risks in 2017 and onwards. 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.

The statement has been approved by the board of directors.



Justin Hampshire

Managing Director
On behalf of the Board of directors