



WH Smith PLC Modern Slavery Statement 2024

Introduction

This is WH Smith PLC's (WHSmith)'s ninth annual statement published in accordance with the Modern Slavery Act 2015. This statement is also published in accordance with the Australian Modern Slavery Act 2018, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 and the California Transparency in Supply Chains Act 2010. This statement outlines the steps we have taken to prevent modern slavery in our operations and supply chain for the financial year ending 31 August 2024.

Modern slavery, including all forms of slavery, servitude, forced and compulsory labour and human trafficking are abhorrent practices that continue throughout the world today. WHSmith and its group companies are committed to ensuring that the human rights of anyone working for us in any capacity are fully respected. We recognise we have a responsibility to prevent modern slavery, and to mitigate and remediate cases where necessary, and we have zero tolerance for any cases of human rights abuses in our business operations or supply chains.

This year we made progress in strengthening our approach, which includes:

- Developing our due diligence processes for products that do not carry one of our brand names (third party products) to assess the level of risk for workers in those parts of our supply chain.
- Introducing responsible sourcing considerations into our supplier onboarding processes for new third part product suppliers to request information at the earliest stage of supplier involvement.
- Doubling the number of factories involved with our Worker Representation Initiative.
- Completing a comprehensive review of our salient risks as part of the United Nations Global Compact, Business and Human Rights Accelerator project.
- Improving transparency of our supply base by providing a list of our suppliers and factories through the Open Supply Hub.

This statement sets out the steps taken to prevent slavery and human trafficking in the operations and supply chains of all subsidiary companies included within our financial statement for the year 2023 / 24 including WH Smith Retail Holdings Limited, WH Smith Travel Limited, WH Smith High Street Limited, WH Smith Hospitals Limited, WH Smith North America Inc and WH Smith Australia Pty Ltd. The statement was approved by the Board of WH Smith PLC on 29th January 2025.

Carl Cowling
Group Chief Executive, WH Smith PLC
Date: January 2025

Mandatory Criteria

- (a) Reporting Entity: Page 1
- (b) Reporting entity's structure, operations, and supply chains: Pages 2-4
- (c) The risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls: Pages 6-7
- (d) The actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes: Pages 8-11
- (e) How the reporting entity assesses the effectiveness of these actions: Page 12
- (f) The process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement): Page 13
- (g) Any other information that the reporting entity, or the entity giving the statement, considers relevant: N.A.

Our Business Operations

WHSmith is a leading global travel retailer for travel essentials operating from airports, hospitals, railway stations and motorway services areas. We also have a smaller business located on UK high streets and an online presence providing our customers with direct access to stationery, books and gifts.

- **Travel UK** is the largest division in the Group and operates from airports, hospitals, railways stations and motorway services across the UK, selling a range of products including food and drink, books, magazines, digital accessories, health and beauty products and souvenirs. As of 31st August 2024, Travel UK operated from 594 stores. This year, we launched our first food to go range called Smith's Family Kitchen.
- **North America** is the second largest division in the Group in profit terms with stores primarily in airports across the continent, and a smaller Resorts business located in Las Vegas. We operate from 341 stores in the United States and Canada.
- **Rest of the World** division operates in 29 countries worldwide from 356 stores, throughout Australia, the Middle East, Asia and Europe. Further details on international locations, including the numbers of stores in each country, can be found on our [website](#).
- **WHSmith High Street** sells a wide range of stationery, books, newspapers, magazines, toys, cards and confectionery. As of 31 August 2024, the business operates from 500 stores located on UK high streets and in shopping centres. Our High Street stores also include business partnerships with the Post Office Limited and Toys "R" Us. We have an online presence through [whsmith.co.uk](https://www.whsmith.co.uk), our online personalised greetings cards and gifts website [funkypigeon.com](https://www.funkypigeon.com) and our specialist pens business [cultpens.com](https://www.cultpens.com).

We directly employ over 14,000 colleagues to operate our stores across the world (as at 31st August 2024). We also have agreements with a number of partners to run franchised stores on our behalf.

This year we transferred the running of our three UK-based distribution centres and logistics operations to a third-party provider, GXO. We are working closely with GXO to ensure appropriate due diligence measures are in place to prevent modern slavery.

Our Supply Chain

WHSmith rely on over 3,000 suppliers to provide trade products, goods not for resale and services. Suppliers range from large multi-national companies to small and medium sized enterprises.

Purchasing and supply chain management are led by a team of buyers based predominantly in the UK, supported by a procurement and ethical trade team based in Hong Kong and Shanghai.

Own Brand Products

We work with over 200 suppliers who provide our own-brand products – principally stationery and technology accessories. The vast majority of suppliers for our own-brand goods are based in China, and we also source a small number of products from factories in India, Indonesia, Philippines, South Korea, Taiwan, Turkey and Vietnam. Chilled food is sourced locally within our countries of operation. We have the strongest relationships, and most influence, with our top 20 suppliers by value, where we buy a larger proportion of their supply and tend to have longer-term commercial relationships. Outside of this supply base, we tend to be a comparatively small customer, buying relatively limited quantities, often of seasonal products. Our ability to influence activity with these suppliers is more limited.

This year, we launched our own branded range of food to go products, Smith's Family Kitchen. Prior to launch, we conducted due diligence with our new suppliers, reviewing policies on modern slavery and labour rights, and checking suppliers' processes for audit and engagement of their supply chain.

Third party branded products

Over 1,500 suppliers provide third-party branded products, ranging from large multi-national brands to small enterprises, with complex global supply chains involving thousands of businesses.

Procurement (non-trade)

We have over 1,500 suppliers of non-trade services and goods not for resale, which include IT equipment, cleaning services and logistics.

Governance and policy frameworks

We have a well-developed set of policies and processes to protect the human rights of those who work for us, either directly in our operations, or indirectly through our business partners and in our supply chains. These policies and processes include measures to prevent modern slavery. We will not tolerate any abuse of human rights, including any form of slavery, anywhere in our business, supply chains or partnerships.

WHSmith is committed to respecting human rights in our business operations and supply chain as set out in [the United Nation's Universal Declaration of Human Rights](#); [the United Nation's Guiding Principles on Business and Human Rights](#); and the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#).

Our governance framework

The WHSmith Board oversees the governance of sustainability issues, including those relating to modern slavery and wider human rights. The Group Board has ultimate responsibility for modern slavery and receives an update on the effectiveness of risk management and controls at least once per year. The Environmental, Social and Corporate Governance (ESG) Board Committee leads and oversees delivery of our sustainability strategy, setting out our ambition and monitoring progress. The Committee is responsible for understanding the potential impact and related risks of ESG

considerations on the business. It approves the Company's sustainability strategy - including those components relating to human rights and responsible sourcing policies; objectives and the roadmap for delivery; and monitors progress against agreed targets. The ESG Committee meets at least three times per year.

The Group Audit Committee is responsible for governance in respect of company systems for internal controls, business risks and related compliance activities. This includes any principal risks relating to human rights. The Group Executive Committee has overall accountability to the Board for sustainability issues, including those relating to modern slavery.

An ESG Steering Group chaired by the Group Chief Executive and including the Managing Directors of each business, the Chief People Officer, the Group Communications Director and the Sustainability Director meets monthly to review progress and next steps for all ESG work, including our human rights strategy and modern slavery work.

As part of WHSmith's risk management processes, detailed risk registers are maintained by each business and used to identify, manage and monitor risks. Business Risk Committees meet quarterly and monitor action plans for measures to prevent modern slavery or associated risk issues in business operations and supply chain.

Modern slavery risks and the measures taken to mitigate those risks are co-ordinated by the Sustainability Director, who also leads the development of policies, processes and wider activities to prevent modern slavery across our businesses and supply chains.



Policies and standards

Our policy framework includes a number of group-wide standards relevant to protecting human rights and preventing modern slavery, all of which are reviewed annually by our Board-level ESG Committee.



One of WHSmith’s core values is ‘Value our People’ and we try to ensure that all colleagues are valued and respected in an open and honest environment. Our [Code of Business Conduct](#) sets out how our business operates, and what is expected of every person who works for and on behalf of WHSmith. This includes WHSmith employees, directors, contractors, subsidiaries, joint ventures, suppliers, franchisees, agents, consultants and professional advisors.

Our Code of Conduct makes it clear that we will not tolerate any form of discrimination, harassment or bullying. In support of this Code of Conduct, we have additional policies covering equality and diversity, dignity at work, grievance mechanisms and whistleblowing.

Our [Human Rights Policy](#) emphasises our commitment to respecting the human rights of our employees, those working for our suppliers and business partners, and our customers and the communities in which we are based. It sets out our values, principles and monitor procedures for each of our stakeholder groups and includes those linked to grievance mechanisms and access to remedy.

Expectations for suppliers and business partners are set out in our [Responsible Sourcing Standards](#) which are aligned to the Ethical Trading Initiative’s (ETI’s) Base Code. These Standards provide further clarification on our expectations regarding modern slavery controls, including restrictions on the withholding of identity documents and payments of deposits, additional information on verification checks for child labour and steps to prevent excessive working hours. We also stipulate that no worker should have to pay a fee or other deposit for a job and include specific policy requirements aimed at protecting migrant workers, agency staff and female workers.

We continue to support industry-wide initiatives and are a signatory to the British Retail Consortium’s [Better Retail, Better World](#) actions, which commits the retail industry to build a fairer, more sustainable economy in line with the UN Sustainable Development Goals, including promoting decent work for all.

Embedding our policies

All employees are expected to re-appraise themselves of the requirements of Our Code of Business Conduct and associated policies covering modern slavery risks on an annual basis and certify that they have done so. The Code of Business Conduct is also included in induction material for all new starters. We expect our staff to have completed a number of essential training courses relating to responsible commercial practices, including risks from modern slavery.

We regularly refer to the requirements of our Code of Business Conduct and Responsible Sourcing Standards through our dialogue and engagement with suppliers, business partners and franchisees. WHSmith's joint venture and franchise partners are required to provide written confirmation of compliance with our policies every year. Our Responsible Sourcing Standards are included in all standard supplier contracts and agreements. Potential new suppliers are informed of our Responsible Sourcing Standards during the tender process so that they can take our requirements into account when quoting for the provision of goods or services. Any potential new supplier of our own-brand products is audited by our in-house, specialist ethical trade team before any order is placed.

Own Brand Products: Suppliers are required to notify WHSmith of any non-compliances with our Responsible Sourcing Standards. We audit suppliers of our own-brand products at least every two years and have processes in place to deal with any non-conformances and drive continual improvement. Audits are conducted by our in-house, specialist teams based in Hong Kong and Shanghai, who make specific checks on modern slavery as part of their processes. The team undertake announced and unannounced site visits to own brand suppliers, in addition to assessing the reports of inspections undertaken by third party audit firms.

Third party audits, covering the same elements of the ETI's Base Code as our own, are used to assess compliance with our Responsible Sourcing Standards for those factories where the order value and ethical trade risk is low. Our in-house team will review the report and assess any corrective action plan and may follow this up with a physical visit if there is any doubt that standards are not being met. We also ask our suppliers to ensure that they are upholding the same standards of human rights, including steps to prevent modern slavery in their own supply chains.

Any issues identified are categorised by level of seriousness, and an action plan is put in place to address non-compliance within an agreed timescale. If the factory does not adhere to an agreed corrective action plan to address areas of non-compliance, the supplier receives a formal written warning. This communication outlines the reasons for the warning and the steps which would need to be taken before any orders will be resumed. In the event of any serious violations, where a supplier shows no steps to improve, no further orders will be placed.

WHSmith funds a confidential worker hotline operated by a third-party organisation, to provide a channel for workers to report any concerns that they may have over their employment conditions or possible exploitation. Any suggestion of any breach in our responsible sourcing requirements is investigated thoroughly and the required remediation put in place.

There were eight phone calls and nine WeChat messages through the worker hotline during the year. The calls related to workers wanting reassurance that they had received all relevant entitlements in terms of pay, holiday and social insurance. In every case, the worker queries were investigated and followed up to the workers' satisfaction.

Third Party Products: suppliers of trade products which do not carry one of our brands are informed of our policies and Responsible Sourcing Standards prior to onboarding. Suppliers are asked to provide due diligence information at the earliest stage of their engagement with WHSmith, with our expectations being made clear during commercial negotiations.

Whistleblowing hotline

Our confidential whistleblowing hotline, 'Speak Up', is available for employees, agency staff and third parties to report any concerns they may have about any aspect of their work for WHSmith, including

modern slavery concerns or human rights violations. The operation of this is managed by 'Safecall' and concerns can be raised by telephone or online. There were no reported incidents relating to modern slavery during the reporting period.

Risk identification and assessment

We use a wide range of sources of country and supplier-specific information from external organisations and our own intelligence gathering in order to inform our risk identification and assessment processes.

We recognise that there is a risk of modern slavery in any area of our business or supply chain, and that the risk is greater for certain groups of individuals, such as migrant workers, agency staff and seasonal employees. In order to better understand and continually assess those areas of our business and operations which give rise to the highest modern slavery risks, we use a number of external and internal sources including:

- Membership of the ETI which gives us access to resources, guidance and benchmarking. We participate in the General Merchandising workstream with other retailers, providing peer learning and examples of best practice within the industry. We have access to dialogue with other companies, civil society groups and trade unions on best practice in identifying, managing and reporting on modern slavery issues;
- Membership of the British Retail Consortium (BRC) and the United Nations Global Compact (UNGC) which provide information and insights on human rights issues;
- Sources of modern slavery risks for particular countries (such as the [Global Slavery Index](#) produced by the Walk Free Initiative and the International Trade Union Congress [2024 ITUC Global Rights Index](#));
- Information from in-house supplier engagement and audit processes, and third-party audits, including those published through [Sedex](#). We recognise there are limitations in audit investigations, and so our approach includes wider engagement and collaboration processes with suppliers; and
- Interviews with workers and with worker representatives to understand the issues that are important to them in their place of work. We conducted confidential worker surveys, and the workers gave ratings, which ranged from 1 (lowest satisfaction) to 5 (highest satisfaction). The survey included different areas such as working hours, overtime arrangement, air quality in the workshops, noise levels and PPE usage. There were some areas in the survey for workers to provide opinions on top of the existing questions. 26 factories joined the survey, and 1,610 completed surveys were received.

In our business operations, areas of potential exposure include use of agency workers contracted for security and cleaning services, many of whom have moved to the UK from other countries.

The potential risks for **service providers and other business partners** include workers involved with store construction and refit providers, and shipping and distribution partners.

In our supply chain for trade goods, areas of potential exposure include:

- Bonded labour in the manufacture of stationery products, toys, gifts and technology accessories for foreign workers who may have been asked to pay deposits to recruitment agencies, hand over identity papers, or ask for an exit permit to leave the country.
- Exploitation of seasonal and foreign workers in our chilled food supply lines.
- Child labour in the manufacture of stationery products, toys, gifts and technology accessories, particularly in China, India and Malaysia.
- More than 90% of our own-brand products come from China where there is a risk of forced labour, excessive working hours and wages below statutory requirements.

We continue to utilise the results of our risk assessment to better understand the nature of potential and actual risks and to ensure that they are being appropriately managed and mitigated. During the year, we reviewed our most salient labour issues to identify which are important because of their potential detriment on the people who work for and on behalf of WHSmith:



Due diligence and risk management

Our due diligence processes focus on those areas of highest risk identified by our risk identification and assessment processes. We monitor our business and supply chain for any indicators or evidence of modern slavery or human trafficking and ensure that there are controls in place to prevent incidents occurring.

WHSmith's due diligence process is based on the [UN Guiding Principles on Business and Human Rights](#), ensuring that we identify, prevent, mitigate and account for how we address any adverse impacts. Our due diligence is based on some core and practical beliefs – that workers are at the centre of the process; that modern slavery is likely to exist somewhere in our supply chains; that collaboration with business partners, suppliers and other third parties is essential; and that due diligence should be closely aligned to our commercial business practices.

Due diligence in our business operations

Our due diligence activity to mitigate risks from modern slavery in our own operations begins with ensuring that our staff know how to spot the signs of modern slavery, what questions to ask when working with business partners and what else might be required of them to identify and mitigate any risks. Line managers, our human resource teams and personnel working with our franchisees and business partners have all completed our online training course on modern slavery.

Our recruitment and onboarding procedures ensure that employees are eligible to work in their country of residence, and that they have a bank account in their own name. There is a 'speak up' line for employees and agency workers to raise any concerns that they have, and call handlers have been trained on how to identify modern slavery risks. Calls are monitored for any suspected concerns in relation to modern slavery.

Management teams in all our international businesses are regularly briefed on possible indicators of modern slavery and the associated risks. Our International Management Team based in our UK head office regularly visit our international operations in Europe, the Middle East and Asia to emphasise the importance of due diligence to prevent modern slavery.

We have made on-going efforts to promote the well-being and mental health of all our workforce, with regular communications about how employees can look after themselves, and places where they can seek support locally if they need it. We continue to promote the WHSmith Benevolent Fund, a registered charity that benefits WHSmith employees and their families who are in financial difficulty or hardship and to ensure that all staff were aware of the support line available for all employees to seek confidential third-party help with any challenges that they may be facing.

GXO manage our three UK distribution centres and have internal policies on modern slavery, how to spot the signs and what to do if there was a suspected case or cause for concern. The information is available to all employees. Training for employees about modern slavery is part of the mandatory Code of Business Ethics training. Posters across each site provide step by step instructions on how to report concerns over potential modern slavery.

Due diligence in our supply chain

We continue to focus on our own brand products as we believe we have greater visibility and leverage with this part of our supply chain. We operate a long-established, supply chain monitoring process to assess and mitigate ethical trade risks for our own-brand suppliers. Labour rights are a key part of this process and are included in the evaluation of new suppliers and the on-going management of existing suppliers. The work is undertaken by a specialist team based in Hong Kong and Shanghai. This year we have extended our due diligence processes for third party products.



As part of our supplier on-boarding process, any new suppliers to WHSmith must provide evidence of adherence to international standards of human rights and environmental management and that they comply with our Responsible Sourcing Requirements. All new high risk or high value suppliers are

visited by our in-house team before any orders are placed. Lower value potential suppliers are required to provide an independent assessment of their ethical working practices for us to review.

If a potential new supplier is found to be non-compliant with a part of our Responsible Sourcing Requirements, we will try to work with them to address the issue. If we believe that after appropriate support, non-compliances cannot be remedied, we will place no further orders with that particular supplier.

We use a combination of in-house audits, third party assessments and on-going engagement with suppliers and workers to identify any potential or actual incidents of modern slavery. Audits are often unannounced and include confidential worker interviews, inspection of worker accommodation and extensive document checks. Special attention is paid to modern slavery and the process is focussed on risks that are appropriate to individual suppliers. For example, our visits to Chinese factories will look for signs of excessive working hours, risks to agency workers or any signs of under-age labour

Working hours are closely monitored to ensure that long hours are strictly limited to peak times to cope with seasonal demand and are not a permanent feature for workers. We also ensure that there is a clear policy for voluntary overtime hours which workers agree to and are paid for accordingly. We avoid placing late orders wherever possible to ensure that factories have enough time for production and do not need to put pressure on workers to work long hours.

We have maintained regular engagement with our suppliers and have strengthened our due diligence activities to promote worker health and safety, fair payment practices and limits on worker overtime.

During our 2023 / 24 financial year, our factory audit and supplier engagement programme identified a number of non-conformances with some elements of our Responsible Sourcing Requirements that could indicate a heightened risk of modern slavery. These included wages not being paid in accordance with the statutory minimum; missing paperwork in relation to voluntary overtime agreements; excessive working hours which are assessed against both the legal requirement and our Responsible Sourcing Standards; and payment irregularities. We have agreed action plans with all suppliers to address any non-conformances and followed up to ensure that any impacts on workers have been appropriately remedied.

We require suppliers to maintain a mechanism for workers to openly communicate and share grievances with management, without fear of reprisal, intimidation or harassment. This requirement is included in our Responsible Sourcing Standards and compliance is checked as part of our audit programme.

We know that audit processes are not necessarily the most effective way of identifying incidences of modern slavery, and so we continue to engage with our suppliers to help them build their management systems and mechanisms for workers to be able to present their views to and raise any concerns with senior management. We are proactively working with key suppliers in China to increase the channels for workers to voice any concerns they may have over labour standards or modern slavery issues.

This year, we discovered that a child was present during the school holidays at a supplier's site where their mother was working and staying in on-site designated accommodation. The child was not engaged in any work though it was possible that the child was not under constant supervision by their mother. The supplier was also used by a fellow member of the ETI, and together, we worked closely with the Centre for Child Rights and Business to provide training and awareness for factory

management, as well as supporting them to set up a child friendly space, where children can read, draw and play with supervision from a trained member of staff during school holidays.

We have helped to establish worker representative councils, to increase worker voice representation to raise and resolve issues regarding working conditions, pay, or any concerns about modern slavery. Factory management are provided with training on how to ensure worker representatives are freely elected, how to collect suggestions from all employees and how to report back on outcomes from the worker committee meetings. WHSmith monitors the worker committees closely, reviewing agendas and meeting minutes and ensuring that any corrective action is undertaken, and that appropriate remedy is provided for workers.

The aim of the project is to help some of our key suppliers to develop fully functioning worker management committees to represent workers on any matter affecting their rights and to resolve problems as they arise. 164 issues have been identified this year across 26 suppliers' factories, with all of them being addressed and remedied successfully. They included issues relating to working and living arrangements, worker health and safety and food quality.

We are continuing to engage with tier two suppliers who provide materials and components to our direct tier one suppliers and have visited nearly half of our tier two suppliers assessed as providing significant materials or componentry for our own brand products. Our Asia Sourcing team continue to provide support to suppliers to build up their own capability to identify and manage salient risks in their supply chains independently.

We continue to review the policies and process to minimise any risk of modern slavery in the businesses of our UK-based suppliers of chilled food to confirm that appropriate controls are in place to assess and address modern slavery risks.

Third party branded products: Improvements to our supplier onboarding process now mean that we are receiving initial due diligence information from all new suppliers. This includes whether they have policies addressing the prevention of Modern Slavery and Human Rights abuses, their compliance with our Responsible Sourcing Standards, and whether they conduct due diligence on their supply chain. Additionally, suppliers are asked to confirm that they are willing to share supply chain details and audits upon request, and that they are not supplying products from countries on our restricted list.

The other part of our due diligence for third party products relates to the existing suppliers that we already work with. We risk assess all new lines on the basis of country of origin and the type of product supplied, and higher risk lines are subject to additional due diligence in the form of supplier engagement and audit review.

Two of our suppliers in Malaysia providing food items to our Singapore business were identified as having non-compliant practices, including storing passports for workers without a policy for voluntary document retention policy and payment of recruitment fees by a few migrant workers. Our commercial team in Singapore supported by informing the supplier that we do not tolerate these practices and the reasons why. As a result, both suppliers developed their policies and practices to ensure full compliance with our standards.

Training

We recognise that all our colleagues working with suppliers and business partners need to be able to recognise the signs of modern slavery and to know what to do if they encounter anything of

concern. Our suppliers also need to understand that modern slavery will not be tolerated in our supply chain and that they must have policies and processes to prevent it.

Our digital learning platform which is for all WHSmith colleagues based in the UK includes mandatory completion of our e-learning course on modern slavery by those employees who have direct contact with our suppliers, business partners or who work in high-risk areas of our business. Colleagues from commercial teams, procurement, human resources and the international team have completed the training. The course is designed to ensure that anyone in our business who is likely to interact with suppliers or other business partners understands:

- What we mean by the different types of modern slavery;
- How to identify possible risk factors and indicators of modern slavery;
- What our Responsible Sourcing Standards and Human Rights Policy requires of suppliers;
- What to do in the case of finding any evidence of bonded, forced or child labour, or human trafficking.



All employees are expected to re-familiarise themselves with our Code of Business Conduct and associated policies every 12 months and confirm in writing that they have done so. Our e-learning materials on the issues covered by the Code of Conduct include sections on human rights and supplier engagement processes.

This year, in person and online refresher training was provided for our commercial teams on our Responsible Sourcing Standards and risks of Modern Slavery and Human Rights. Members of the ethical sourcing team also attended working groups on human rights in supply chain held by ETI and BRC in order to learn more from others about emerging issues and best practice in the retail industry.

Evaluating the impact of our programmes

We continue to develop ways of monitoring the effectiveness of our policies and processes to prevent modern slavery. Effectiveness is reviewed as part of our quarterly Business Risk Committee meetings, by the ESG Committee and by the Group Audit Committee which are sub-committees of our Board.

We monitor and evaluate:

- written confirmation of the acceptance of our policies by our business partners;
- key performance indicators relating to our factory audit programme, including the number of supplier assessments completed, individual and collective supplier ratings, key issues that have been identified and follow-up actions required to address any non-conformances;
- the rollout of training programmes and feedback from course attendees to ensure that our training meets our stated learning objectives;
- feedback from employee and supplier hotlines and surveys and through our engagement project focussed on worker representation;

- any other information gathered from our due diligence activities.

Ongoing Commitments

- Review and update our modern slavery training for all colleagues.
- Make progress on our target of having 15% of own-brand suppliers with worker representation committees in place by 2025.
- Further evaluate risk areas within our non-trade supply chain.

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of WH Smith PLC on 29 January 2025.

Signature of Responsible Member

This modern slavery statement is signed by Carl Cowling, Group Chief Executive of WH Smith PLC.

Consultation with WH Smith Australia Pty Ltd

We engaged in a consultation process with WH Smith Australia Pty Ltd (**WHS AU**) in the preparation of this Modern Slavery Statement.

This process included:

- **Review of our Modern Slavery Statement:** WHS AU reviewed our 2023 Modern Slavery Statement. This provided WHS AU insight into our approach to identifying, assessing, and mitigating modern slavery risks across our global operations, including those relevant to WHS AU's business activities.
- **Direct Communication:** We regularly correspond with relevant personnel at WHS AU. These discussions focus on sharing information about each of our specific operations, supply chains, and potential modern slavery risks.
- **Data Sharing:** WHS AU regularly provides us with relevant data regarding its workforce suppliers, and other aspects of its business operations that could be relevant to modern slavery risks. This data is used to inform our assessment of overall group-wide risks.
- **Feedback and Iteration:** WHS AU provided feedback on our Modern Slavery Statement, ensuring that it accurately reflects the specific risks and mitigation strategies relevant to WHS AU's operations.

Through this consultation process, we ensure that WHS AU adheres with our group best practices for identifying, assessing, and mitigating modern slavery risks. It also ensures that WHS AU's understanding of these risks is aligned with our broader risk profile.