Waterstones Booksellers Limited

Modern Slavery Statement for financial year ending 30 April 2024

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "MSA") on behalf of Waterstones Booksellers Limited, a private limited company registered in England and Wales with registered company number 00610095. This statement has been approved by the Board of directors.

We remain sensitive to the risk of modern slavery in our supply chains. We are committed to acting responsibly and with integrity in all our business relationships and continue to take measures to implement and enforce effective systems and processes to ensure that modern slavery and human trafficking is not taking place anywhere within our control or influence.

Our business

Waterstones is a leading retailer of books, stationery and other related products from its shops in the United Kingdom, Ireland, Isle of Man, Jersey, Holland and Belgium and online from its websites at: <u>www.waterstones.com</u>; <u>www.hatchards.co.uk</u>; <u>www.blackwells.co.uk</u>; <u>www.foyles.co.uk</u> and <u>www.wordery.com</u>. We also sell coffee and food from a number of cafés within our shops, arrange and host public and private events within our shops, and support a large number of literary festivals. Our internet business, distribution centre and head offices are all based in the UK.

Our staff

We are committed to creating a working environment that is open, inclusive, supportive, that is based on mutual respect and trust and where everyone feels valued. Our ambition is for our employees, contractors, temporary workers and prospective employees to enjoy a working environment that is free from discrimination, harassment, bullying and victimisation.

We have robust internal policies and processes in place to uphold and protect the rights and working conditions of our staff, to ensure that all employees are safe, of working age, and that we are complying with the provisions of the MSA. These policies are communicated to staff during onboarding and are easily accessible through the company's intranet. We will continue to monitor, review and distribute our policies, seeking to ensure that they remain relevant and effective. As well as our policies covering matters such as recruitment and hours of work, we maintain a Whistleblowing Policy which allows staff to identify and report any potential concerns to appropriate managers or senior officers of the business without fear or threat of reprisal or detrimental treatment. We carry out onboarding checks to ensure employees have the correct eligibility to work in their country of residence.

In addition, we offer face to face and virtual learning on topics such as recruitment, diversity, management and leadership. We are in the process of trialling a new management apprenticeship course utilising our apprenticeship levy and have launched a new manager induction programme. We have recently reviewed many policies and supporting tools for recruitment to ensure we are attracting a diverse workforce. We have reviewed materials for our work experience and internship

programmes along with producing a new Safeguarding Policy to ensure we have awareness and measures in place to protect younger workers.

Furthermore, we have implemented more tools to support the wellbeing of our employees including offering an Employee Assistance Programme, a legal support helpline and 24/7 confidential access to a GP.

Our supply chains

Our supply chains include a wide range of suppliers of books, stationery, coffee, food and other related products. We operate zero tolerance to slavery and human trafficking within our business. We expect all those in our supply chains to comply with our values. Suppliers of physical goods are required to comply with our Supplier Manual, which requires information to be submitted for initial supplier set up and due diligence purposes and incorporates our standard terms and conditions of purchase. We keep our Supplier Manual under review, making revisions and reissuing it to our suppliers as and when we consider necessary. We assess our supply contracts by size and risk profile and whilst our related product ranges have expanded recently to introduce a greater reliance on suppliers outside of the UK and the EU to some extent, we continue to, wherever possible and commercially viable, purchase goods and services from established suppliers in the UK. We expect all suppliers to have suitable antislavery and human trafficking policies and processes in place. We also expect, at the very least, the adoption of 'one up/down' due diligence. A majority of products that we buy are processed through our central distribution centre in the UK, which is fully managed on our behalf by a well-established third-party company, also registered and based in the UK.

We purchase a wide range of professional and operational services as would be expected of a large retailer, such as legal, accountancy, information technology, insurance, property, cleaning, catering, maintenance and other such services from time to time. These relationships are governed by written supply contracts which we aim to ensure are fair and balanced and include responsibilities for compliance.

We acknowledge our responsibility to be alert to the risks of modern slavery and human trafficking in our supply chains. We consider the risks in our current supply chains to be low, based on the location of the majority of our suppliers and product/service categories that we purchase. Nevertheless, we continue to monitor and develop our responsibilities in this regard, as appropriate.

Governance Framework

The Board oversees the governance of sustainability issues, including those relating to modern slavery and wider human rights. The Board has ultimate responsibility for modern slavery and, going forwards, will consider issues relating to risk management and controls at least twice per year.

As part of our risk management processes, a business wide risk register is being implemented which will be used to identify, manage and monitor risks. Our Risk Steering Committee will meet quarterly and monitor action plans for each risk including those in business operations and our supply chain, as needed.

Training

We make training available to relevant members of staff to improve and develop our knowledge on this subject, with particular focus on our human resources, logistics and buying teams. This modern slavery statement is accessible to all and, the Company directors are aware of and have received training in order to understand their responsibilities and to ensure compliance with the requirements of the MSA. We will continue our training programmes, focussing on awareness and reporting and will strive to make further improvements in this regard throughout future years.

Conclusion

This statement reflects the steps that Waterstones Booksellers Limited has taken during its financial year ending 30 April 2024 to ensure that slavery and human trafficking are not taking place in its own business or wider supply chain. We are committed to the continuous improvement of our knowledge and efforts in eradicating modern slavery. We will continue to review and adapt our approach in order to manage these risks effectively.

Signed by:

James Daunt

Managing Director For and on behalf of Waterstones Booksellers Limited Dated: 24 June 2024