

## **Waterstones Booksellers Limited**

### **Modern Slavery Statement for financial year ending 30 April 2025**

#### 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: [www.waterstones.com](http://www.waterstones.com); [www.hatchards.co.uk](http://www.hatchards.co.uk); [www.blackwells.co.uk](http://www.blackwells.co.uk); [www.foyles.co.uk](http://www.foyles.co.uk), [www.hodgesfiggis.ie](http://www.hodgesfiggis.ie) and [www.wordery.com](http://www.wordery.com). 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 and supportive, and 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; to ensure that they are of working age; and to ensure that we are complying with the provisions of the MSA. These policies are communicated to staff during onboarding and are easily accessible thereafter 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 actively encourage feedback from our staff, and we also review feedback provided through different methods such as Glassdoor and exit interviews. We carry out onboarding checks to ensure that employees have the correct eligibility to work in their country of residence, with regular audits taking place. Additional scrutiny is applied to in-depth onboarding checks for those with more senior roles within the business.

We offer face-to-face and virtual learning on topics such as recruitment, diversity, management and leadership. We recently trialled a new management apprenticeship course utilising our

apprenticeship levy which is currently under review. We have also strengthened the induction programme for new shop managers which has been adapted and amended over the years with great success, and we have seen more people in 2025 provided with the opportunity to attend.

We recently reviewed many policies and supporting tools for recruitment to ensure that we are attracting a diverse workforce, along with launching new toolkits for both managers and employees to understand what to expect from their career with Waterstones. We have reviewed materials for our work experience and internship programmes which continue to expand each year with positive feedback, along with producing a new safeguarding policy to ensure that we have awareness and measures in place to protect younger workers. Furthermore, we have implemented further 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, together with advice and support on financial wellbeing.

### 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 these 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.

To strengthen our approach to ethical sourcing and supply chain transparency, we are now working with Sedex (Supplier Ethical Data Exchange). Sedex helps businesses to identify and manage risks in labour rights, health and safety, the environment and business ethics. The Sedex registration process includes completion of a questionnaire by suppliers which is based on internationally recognised labour standards, including those set out by the International Labour Organisation (ILO), and is aligned with the Ethical Trading Initiative's (ETI) Base Code. This provides us with an opportunity to work together with suppliers to ensure best practices are in place and continuously improved upon. Our aim is not only to identify and manage risk but to support our suppliers in creating safe, fair, and respectful working environments for all employees.

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, wherever possible and commercially viable we continue to purchase goods and services from established suppliers in the UK. We expect all suppliers to have suitable anti-slavery and human trafficking policies and processes in place. We also expect, at the very least, the adoption of 'one up/down' due diligence. The majority of products that we buy are processed through our central distribution centre in the UK, which we now manage in-house.

We purchase a wide range of professional and operational services from time to time, as would be expected of a large retailer, such as legal, accountancy, information technology, insurance, property, cleaning, catering, maintenance and other such services. These relationships are governed by written

supply contracts which we aim to ensure are fair and balanced and include compliance responsibilities and obligations.

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 the product/service categories that we purchase. We continue to monitor and develop as appropriate our responsibilities in this regard.

#### 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 is provided with updates relating to risk management and controls at least twice per year.

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

#### 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, along with our people managers across the business. We have a mandatory annual and bi-annual training programme which includes topics such as Fraud, Bribery & Corruption, Equity, Diversity and Inclusion, Sexual Harassment and Bullying & Harassment. This modern slavery statement is accessible to all employees within the business. We will continue our training programmes, focussing on awareness and reporting, and will make further improvements as is appropriate in future years. We actively monitor completion of training modules to ensure that staff undertake and finish applicable courses in a timely manner.

#### Conclusion

This statement reflects the steps that Waterstones Booksellers Limited has taken during its financial year ending 30 April 2025 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 in our understanding of the efforts to eradicate 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: 30 September 2025**