

Waterstones Booksellers Limited

Modern Slavery Statement for the financial year ending 2 May 2026

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 are 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; www.hatchards.co.uk; www.blackwells.co.uk; www.foyles.co.uk, www.hodgesfiggis.ie and 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, based on mutual respect and trust, where everyone feels valued. Our ambition is for our employees, contractors, temporary workers and prospective employees to experience a working environment that is free from discrimination, harassment, bullying and victimisation.

We maintain robust internal policies and processes to uphold and protect the rights and working conditions of our staff, ensuring that employees are safe, are of working age, and that we comply with the provisions of the MSA. The policies cover topics including Bullying, Harassment & Victimisation, Equity, Diversity & Inclusion, Grievances, Recruitment & Onboarding, and Whistleblowing, and are communicated during onboarding and remain readily accessible through the company intranet. We continue to review and, where needed, update our policies at least every two years to ensure they remain effective and aligned with evolving legal and best practice requirements. We also maintain an ongoing training programme to reinforce the responsibilities of employees and managers in this area. During the year, we developed an enhanced harassment training course to reflect potential scenarios that employees may experience. It offers realistic, relevant and practical scenarios which are designed to reinforce employees' understanding of harassment and how to deal with it in situations that they might experience, including in connection with visitors, contractors and in a customer service environment.

Our Whistleblowing Policy enables employees to raise concerns confidentially and without fear of reprisal or detrimental treatment and we are implementing changes to our Supplier Manual so that

equivalent channels are available to workers in our supply chain. We encourage feedback from employees through a variety of channels, including employee feedback platforms and exit interviews, using this insight to inform ongoing improvements across the business.

We carry out comprehensive right-to-work checks for all employees before employment commences, supported by regular internal audits. During 2026, we completed a full audit of right-to-work checks across our Retail estate. Additional due diligence continues to be undertaken for senior appointments. We also carry out right-to-work checks for temporary workers and the agencies we work with are responsible for right-to-work checks for agency workers.

During the year, we continued to invest in learning and development across the business. Face-to-face and virtual learning programmes remain available, covering topics including people leadership skills, career development and inclusion. Following our enhancement to our new shop manager induction we have delivered a significant number of courses aimed at those transitioning into management roles. We have invested in improving both our Book Seller and Café induction programmes to support new starters joining the business. We continue to review the effectiveness of our intern programme, apprenticeship programmes and wider management development initiatives to ensure they meet the needs of the business and our employees.

Our recruitment processes remain a focus, and we continue to develop our approach to attracting and retaining a diverse workforce. Our work experience and internship programmes have continued to expand, supported by safeguarding policies and procedures designed to protect younger workers. We also continue to promote employee wellbeing through our Employee Assistance Programme, legal support helpline, 24/7 confidential GP access and resources supporting 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. Breaches of the Supplier Manual are monitored by the business and assessed case-by-case. Where appropriate, and depending on severity, breaches could result in termination of the supplier.

As part of our focus on ethical sourcing and supply chain transparency, we continue to work with Sedex (Supplier Ethical Data Exchange), an organisation that supports businesses in identifying and managing risks relating to labour rights, health and safety, the environment and business ethics. Sedex will be working with our Procurement Manager to ensure that suppliers complete a Self-Assessment Questionnaire based on internationally recognised labour standards, including those established by the International Labour Organisation, and aligned with the Ethical Trading Initiative Base Code.

During the year, the number of our suppliers registered through Sedex increased to 102. This enables us to better assess potential risks, engage constructively with suppliers, encourage good practice and

support the continuous improvement of working conditions throughout our supply chain, and informs and strengthens our internal procurement processes which we continue to develop.

We assess our supply contracts by size and risk profile and, whilst our related product ranges continue to involve suppliers outside of the UK and EU, wherever possible and commercially viable we continue to purchase goods and services from established suppliers. 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 continues to be managed in-house.

We purchase a wide range of professional and operational services from time to time, such as legal, accountancy, information technology, insurance, property, cleaning, catering, maintenance and other such services. These relationships are governed by written supply contracts which include appropriate 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 and 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 is provided with updates relating to risk management and controls at least twice per year.

As part of our risk management processes, our business-wide risk register is used to identify, manage and monitor risks. Risks are assessed based on the probability of their occurrence and the severity of the outcome. Our Risk Steering Committee meets quarterly and monitors action plans for each risk as needed, including those relating to business operations and our supply chain. No risks relating to modern slavery and wider human rights matters, including human trafficking, have been identified as high risk.

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, Equality, Diversity and Inclusion, Sexual Harassment and Bullying & Harassment. Completion of relevant training modules is actively monitored to ensure that staff undertake and complete applicable courses in a timely manner, with any failure to complete training reported to the employee's manager for follow-up.

This Modern Slavery Statement is accessible to all employees within the business. We will continue our training programmes, focusing on awareness and reporting, and will make further improvements as appropriate in future years.

Conclusion

This statement reflects the steps that Waterstones Booksellers Limited has taken during its financial year ending 2 May 2026 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 understanding of the risks of modern slavery and the steps required to address them. We will continue to review and adapt our approach in order to manage these risks effectively.

Signed by:

A handwritten signature in black ink, appearing to read 'J. Daunt', with a stylized flourish at the end.

James Daunt

Managing Director

For and on behalf of Waterstones Booksellers Limited

Date: 8 October 2026