

FRASER HART Fraser Hart Group Modern Slavery Act 2015 – Transparency Statement

This statement has been published in accordance with section 54 of the UK Modern Slavery Act 2015 and sets out the initiatives undertaken during our financial year ended 30th June 2019 to mitigate the risks of slavery and human trafficking in our business and our supply chains

This statement relates to all businesses operated by the Fraser Hart Group in the United Kingdom and includes our brands

- Fraser Hart
- Bernstones
- Crouch
- Lyons

At Fraser Hart, our purpose is to ensure that our beautiful jewellery and watches are ‘Chosen With Love’ by our customers. To achieve this, we seek to create and source only the very highest quality products from around the world and, in doing so, we also choose With Love. We are only motivated by goodness and so there is absolutely no tolerance in our Group for Modern Slavery.

Modern slavery is a heinous crime and a brutal way of maximising profits, by producing goods and services at ever lower costs with scant regard for the terrible impact this has on individuals.

We at Fraser Hart have a vital role to play in ensuring that it does not exist within our sector and we are taking deliberate actions to ensure we are not knowingly or unknowingly complicit in any form of Modern Slavery or Human trafficking. Individually and collectively we must be vigilant and continuously improve.

1. Structure and supply chains

We source our products from several countries around the world, principally:

UK, Belgium, Switzerland, Denmark, Italy, Germany, Spain, Turkey, India, Thailand, China, Canada

We have a team of very experienced and knowledgeable buyers who specialise in ranging each of our jewellery and watch product categories Proc .nt

of services and non-stock supplies is managed and overseen by the relevant Senior Management and Executive Leadership teams.

We currently work with long established and trustworthy supply partners to ensure we only align ourselves with those who share the same principles and implement best practices, especially in relation to compliance with labour laws , fundamental human rights, and respect for health & safety and the environment. Before selection of new suppliers, we follow a due diligence procedure which is aimed at ensuring they comply with our supply chain code of conduct.

2. Policies on modern slavery

We have created and issued a supply chain manual detailing the 30 principles of our supply chain code of conduct which cover the standards to be achieved and maintained in 4 main areas:

- General Legal Requirements
- Responsible Supply Chain
- Labour Practices and Human Rights
- Environment

This manual has been shared with all of our jewellery and watch suppliers and we ask them to confirm their acceptance and compliance with these principles to us in writing. In addition to the manual, we have also requested detailed reports to ensure compliance with our own industry standards. These include signed statements and confirmations relating to:

- Kimberley Process Agreement
- Nickel Directive
- Reach Regulations
- Dirty Gold & conflict Materials
- Invoice Statements

3. Risk Assessment

We have introduced a philosophy of supply chain partnership in which the relationships consist of open and honest information share with the co. on

aim to continuously improve the business relationship including working collaboratively on risk mitigation.

We request that relevant suppliers be members of the Responsible Jewellery Council (RJC), an independent body that carries out comprehensive audits of its members and aspiring members to ensure they meet agreed standards of business practices including human resource and labour practices. Where suppliers are not members of the RJC, compliance with our Supplier Manual ensures that the risks of Modern Slavery are mitigated.

This financial year our senior executive buyer along with the buying team have made factory visits to 35% of our existing preferred suppliers including all new suppliers.

During this audit our buying team personally check that key human resource practices meet our standards as set out in our code of conduct. This includes an extensive factory tour where we can observe their standard operating procedures, records of training on key processes and meet factory workers within the environment they work within. In addition, we also gain access to our suppliers' invoices from their own suppliers to ensure conformance within the extended chain.

To date, we have not discovered or been made aware of any slavery or human trafficking issues within the operations of any of our suppliers. Should this ever occur, or should any supplier refuse to conform with our code of conduct, we would cease to source any product from them.

4. Measuring effectiveness

We have implemented internally a program of continuous improvement and our effectiveness of this is measured by our key performance Indicators.

- ALL Fraser Hart employees to receive policy awareness training by end of FY2019
- All Suppliers commit to the Modern Slavery Policy statement set out in supplier manual;