



WATCHES OF SWITZERLAND GROUP PLC
WATCHES OF SWITZERLAND OPERATIONS LIMITED
WATCHES OF SWITZERLAND COMPANY LIMITED

MODERN SLAVERY ACT 2015 – TRANSPARENCY STATEMENT FOR THE FINANCIAL YEAR 2019-2020

CORPORATE STRUCTURE AND TRADING ENTITIES

Watches of Switzerland Group PLC and Watches of Switzerland Operations Limited are not trading companies, but are holding companies of Watches of Switzerland Company Limited. We believe that Watches of Switzerland Group PLC and Watches of Switzerland Operations Limited are fully compliant with the requirements of the Modern Slavery Act 2015: they achieve this compliance through the operations of Watches of Switzerland Company Limited.

The various brands operated by Watches of Switzerland Company Limited in the United Kingdom (Watches of Switzerland, Mappin & Webb and Goldsmiths) are not separate limited companies, but are trading divisions of Watches of Switzerland Company Limited. We have a number of corporate entities that operate in the United States, namely Mayor's Jewelers Inc, Watches of Switzerland LLC,

Watches of Switzerland (Nevada) LLC and Watches of Switzerland (A/S) LLC. All of these companies are subsidiaries of Watches of Switzerland Group USA Inc, which is in turn a subsidiary of Watches of Switzerland Company Limited.

BRANDS AND BUSINESSES COVERED BY THIS STATEMENT

This statement relates to all of the brands operated by Watches of Switzerland Company Limited in the United Kingdom and the United States:

- Watches of Switzerland
- Mappin & Webb
- Goldsmiths
- Mayors

INTRODUCTION

At the Watches of Switzerland Group, one of our Values is to do the right thing, and as a business we do our best to live up to this standard. This Value commits us to being fair, reasonable and responsible in all of our interactions.

We would certainly never knowingly engage with a supplier that was in any way involved in human trafficking, servitude, forced labour or any other aspect of modern slavery. However, we recognise that such people and organisations will take steps to conceal the true position, meaning that vigilance is always necessary.

GEOGRAPHICAL REACH OF OUR SUPPLY CHAIN

We source our products from a number of countries around the world, principally:



WATCHES

- 1 Switzerland
- 2 Germany
- 3 China
- 4 Japan
- 5 Italy

JEWELLERY

- 1 United Kingdom
- 2 Thailand
- 3 China
- 4 India
- 5 Italy
- 6 United States
- 7 France

RESPONSIBLE JEWELLERY COUNCIL

We are proud to be a member of the Responsible Jewellery Council (RJC). This is an independent body that carries out comprehensive audits of its members and aspiring members, to ensure that they met its exacting standards of business practice, not least in relation to the treatment of their employees. For the period covered by this Statement, our operations in the United States were not yet accredited by the RJC but were working towards this, meaning that their standards were aligned with those of the UK business. We are pleased to say that this accreditation has now been achieved.

We ask our suppliers to be members of the RJC, or working towards such membership. Twenty-two of our current suppliers of jewellery and precious metals are RJC members (and therefore accredited and audited by that body). Amongst our major suppliers the proportion is even greater: all of our top ten suppliers (when measured by value of spend) are RJC accredited. Many of the watch brands that we carry are also accredited by the RJC.

OUR SUPPLIER MANUAL AND CODE OF CONDUCT

Our membership of the RJC is extremely important to us, and a supplier's membership will naturally give us a good deal of confidence that its products are not tainted by modern slavery or other unacceptable practices. However, not all of our suppliers have this membership, and we therefore need to take further steps to obtain the necessary assurances. To that end, we have produced our own Supplier Manual, which is in use in both the UK and US. This manual is provided to all of our suppliers of watches, jewellery and precious metals. We ask our suppliers to return a letter of acceptance to confirm that the supplier, and its staff, will comply with the specifications and requirements set out in the Manual.

Within our Supplier Manual is a Supplier Code of Conduct, which contains twelve principles:

- Employment is freely chosen

- Freedom of association and the right to collective bargaining are respected

- Working conditions are safe and hygienic

- Child labour shall not be used

- Living wages are paid

- Working hours are not excessive

- No discrimination is practised

- Regular employment is provided

- No harsh or inhumane treatment is allowed

- Responsible environmental practices

- Zero tolerance of conflict products

- Compliance with the Watches of Switzerland Group's Code of Conduct

Our Supplier Manual has been revised and updated, so as to require an even greater level of compliance and verifiability from our suppliers. The latest version was issued in January 2020. In this updated manual, we pay particular attention to verifying the origin of raw materials, meaning that we are taking even further steps to ensure that human rights have been respected throughout our supply chain.

FACTORY VISITS

In order to test compliance with our Supplier Manual and Code of Conduct, we carry out factory visits. On these visits, senior members of our management make a personal check of the factory environment and working arrangements (including health and safety standards).

When we visit a factory for the first time, we require our vendors to sign a specific Statement of Commitment, confirming that they operate in compliance with our Code of Conduct, as well as with applicable laws, rules and regulations. All of our top ten suppliers of jewellery and precious metals have been visited by our management, who have carried out an audit on behalf of the company.

CONFLICT DIAMONDS AND THE KIMBERLEY PROCESS

The Kimberley Process is a joint initiative between governments and industry to restrict the supply of conflict diamonds, which are used to finance wars and insurrection against legitimate governments. Further details of the Kimberley Process can be found at www.kimberleyprocess.com

In respect of our operations in both the UK and the US, we require that our suppliers of diamonds have signed up to the Kimberley Process, and ensure that they have made a statement to that effect on their invoices.

SUPPLIERS OF GOLD AND OTHER PRECIOUS METALS

In January 2019 we wrote to all of our jewellery suppliers who provide our UK business with precious metals, asking them to name the source of their raw material. We then checked the suppliers' responses against the Good Delivery List operated by the London Bullion Market Association (LBMA). The LBMA's list seeks to ensure that the bullion is sourced responsibly, that it is not acquired from conflict areas and that human rights standards are properly respected. We are pleased to report that our suppliers were 100% compliant.

In the United States, the purchase of gold is governed by the Dodd-Frank Act, which requires businesses to ensure that they do not buy conflict metals. All of our US jewellery suppliers comply with this federal law. Our supplier manual, which applies to the US as well as to the UK, covers all other precious metals (such as silver and platinum), as well as gold.

STAFF AWARENESS

Our Buying teams are made aware of our Code of Conduct and its requirements, and we explain it to any new recruits to those teams, as part of their

induction process. We have a whistleblowing policy in place and our employees are encouraged to inform us if they suspect unacceptable practices, whether within our own business or our suppliers.

COMMITMENT TO IMPROVE

We are by no means complacent, and we recognise that further steps can always be taken to ensure that nobody involved in the production, distribution and sale of our products is a victim of modern slavery. We recently successfully completed our fourth RJC audit, which (as indicated above) included our United States operations for the first time. Our future audits will be against the RJC's latest code of practice, which is even more exacting than the previous code, particularly in relation to Human Rights compliance. As a result, over the coming years we will go deeper into our supply chain to ensure that not only our manufacturers, but also their suppliers, meet the standards of the OECD in relation to human rights. We will then have even better evidence of the ethical nature of our supply chain, and in the sad event of any of our suppliers falling short of these standards we will withdraw our custom until they have put this right.

In relation to factory visits, we propose to engage with a third party to carry out independent audits rather than relying on our own checks. We expect these new arrangements to be in place in early 2021, and we are looking to arrange four or five factory visits by our independent auditors per year. These audits will specifically focus on human rights, working conditions and compliance with labour laws. Suppliers that are RJC accredited will be included in these visits, as this will provide further independent verification in addition to their RJC credentials.

We welcome the government's new measures to strengthen the Modern Slavery Act that are due to be introduced in early 2021. The new mandated reporting areas will help us improve our operation's response as well as the reporting of our efforts to prevent and tackle slavery.

I confirm that this statement has been approved by the board of directors of Watches of Switzerland Group PLC.



Brian Duffy
Chief Executive Officer
15 October 2020