Modern Slavery And Human Trafficking Statement

Graff is a vertically integrated diamond jewellery business. Our operations comprise the design, manufacture and retail distribution of high and ultra-high end jewellery and watches. In addition, through our procurement and polishing division we source, cut and polish rough diamonds primarily for use in our retail operations.

Whilst the diamond industry has in the past been associated with conflict and exploitation, the industry has taken a number of pro-active steps to combat this, most notably in the form of the Kimberley Process (which certifies that diamonds originate from conflict free zones). Graff has always been at the forefront of such developments and is committed to acting in an ethical and responsible manner in all its business practices. We do not tolerate slavery, servitude, forced or compulsory labour or human trafficking either within our business or within our supply chains. We expect all members of our supply chain to share the same values and adhere to the same best practice guidelines to ensure that no such forced labour exists within their business or their own supply chains.

Through our procurement and polishing division we are subject to the rigorous requirements of the De Beers Best Practice Principles (BPPs). These BPPs set out the detailed standards our procurement and polishing division, Safdico, is required to adhere to in order to maintain its 'Sightholder' status with De Beers. Among other requirements the BPPs focus carefully on supply chain management, provenance claims, child and forced labour and ethical standards generally. Alongside Safdico we are regularly subject to audit procedures in order to ensure ongoing compliance with the BPPs. This has, over a number of years, fostered a culture of increased vigilance and compliance within Graff.

Nonetheless, we are conscious that with an extensive supply chain with wide geographical reach, more can always be done. And whilst we would never knowingly engage with a supplier involved in forced labour, we recognise that such a supplier would take steps to conceal the true position, meaning that continued vigilance is always necessary.

We have therefore developed a Code of Conduct which has been distributed to all new and existing suppliers of the Graff group of companies. This Code of Conduct rejects the use of forced labour. We expect our suppliers to comply with the Code of Conduct and to place similar expectations on their supply chains.

The Code of Conduct sets out our right to audit compliance by inspecting facilities and interviewing staff members (a practice we already undertake on a regular basis as part of our existing procurement and due diligence processes when engaging a new supplier) as well as our right to review records, policies and practices. This will facilitate our ongoing due diligence processes and allow us to identify issues of concern. All these processes have been further developed and enhanced during the financial year ended 31 December 2018, to which this statement relates.

If we identify or suspect non-compliance with the Code of Conduct we will work with the relevant supplier to ensure that immediate remedial action is taken to address the situation, failing which to stop working with the supplier in question.

Our commitment across all the Graff group of companies is to ensuring that there is no forced labour within our supply chains is an ongoing process. Our future plans include further training for staff and development of our due diligence procedures, both when we engage a new supplier and on an ongoing basis in respect of our existing suppliers.

This statement has been approved by the board of Graff's parent company and relates to the financial year ended 31 December 2023. It applies to all the entities within the Graff group of companies.

Francois Graff

CHIEF EXECUTIVE OFFICER

MAY 2024