WARREN JAMES

MODERN SLAVERY STATEMENT 2023

Introduction

Warren James has always believed in treating people with dignity and respect. Since our incorporation in 1979, doing business the "right" way has been a cornerstone of our family business and we have always strived to pursue our business activities in a responsible and ethical manner.
We have a zero tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain. We support the government's objectives to eradicate modern slavery and human trafficking.

Our business and supply chains

Warren James is the UK's largest independently owned jewellery chain with over 200 shops across the country.

Most of our employees are employed on permanent contracts although we also have seasonal temporary workers to accommodate the increased demand in the run up to Christmas. During the period 2020 – 2022, our shops were frequently closed as a result of the legislation enacted due to the pandemic and many staff placed on furlough. We took swift and essential steps to ensure our staff took all precautions when working either in shops or at head office. It now seems that we have moved on and away from the many restrictions and negative impacts on our business as a result of the pandemic.

Our products are sourced from all over the world. We enjoy, and put trust in, long standing relationships with many of our suppliers. We align ourselves with those who share our principles and our fully willing to implement best practices in their business with a focus on employment rights, human rights, health and safety and protecting the environment.

The global Covid-19 pandemic had a huge impact on our supply chains during the 2020-21 and 2021-22 financial years. The effects of the pandemic have continued to have an impact during the 2022-23 financial year.

Our supply chains have also been affected by Brexit and other global issues. We are acutely aware of the impact of the current war between Russia and Ukraine on the global market and the consequences affecting us all.

We are increasingly focused on the environmental and social impacts of our business and in excess of 75% of metals that we use in our jewellery are recycled and we are committed to increasing this percentage even further.

Policies

We have in place a variety of policies for identifying and preventing slavery and human trafficking in our operations and to protect worker rights and to promote a safe and fair supply chain:

- Recruitment policy – we have a robust recruitment policy which includes conducting checks that employees are eligible to work in the UK to safeguard against human trafficking or individuals being forced to work against their will. We endeavor to ensure that employees making recruitment and selection decisions do not discriminate and all applicants will receive fair treatment;

- Equal opportunities policy – we are committed to preventing discrimination and encouraging diversity amongst our workforce. We are opposed to all forms of unlawful and unfair discrimination;

- Whistleblowing policy – we operate a whistleblower disclosure system available to all members of staff so that employees can raise concerns about how their colleagues are being treated or practices within our business or supply chain without fear of reprisal;

- Supplier Code of Practice - which stipulates our requirements, including the obligation for our suppliers to operate in a responsible and ethical manner, the prohibition of child labour and forced labour, appropriate health and safety standards and procedures and compliance with local laws in respect of working hours, minimum wages, overtime and employee benefits;

- Warren James' Terms and Conditions of trade that all our suppliers must sign up to and adhere to. These specifically require all suppliers to adhere to universally acceptable standards of business practice and must not engage in unethical, immoral or commercially unacceptable business activities. Our suppliers must adopt our social, ethical and environmental principles;

- We require all our suppliers to adhere to the Kimberley Process which seeks to tackle the trade in conflict diamonds around the world. The Kimberley Process is an international certification scheme regulating the commercial sale of diamonds. It sets minimum standards each participant must meet and is underpinned by a United Nations mandate and is backed by leading civil organisations.

- We further require all our suppliers to commit to the 'Golden Rules' of the 'No Dirty Gold' campaign which we have espoused since 2006.

- We are introducing an Anti-Bribery and Corruption policy which applies to all employees, suppliers and contractors.

- We are developing an ethical environmental social responsibility statement.

- We are working on a new policy promoting equality, diversity and inclusion within our workforce.

Due Diligence

As part of our initiative to identify and mitigate risk, we conduct due diligence on all new suppliers both at the outset of any relationship and on an ongoing basis.

We seek to:

- Identify and assess potential risk areas in our supply chain;
- Mitigate the risk of human slavery and trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chain;
- Protect whistleblowers.

We have reviewed the Global Slavery Index in assessing the likely risks associated with countries where we have business interests and relationships.

Our buying team is small and closely involved in the process, with a close working knowledge of suppliers.

Prior to Covid-19 our senior management and buying team spent a lot of time overseas developing and monitoring our relationships. Our ability to visit and meet with our international suppliers and contacts in person was severely impacted by the pandemic. We are pleased that we have been able to resume some travel again to visit international contacts and suppliers.

Given the relaxation on travel restrictions, we are trying to move forward with a process of factory audits of suppliers.

Training and awareness

All members of staff undergo a full induction process on joining the company. This includes training on all relevant policies and procedures of Warren James.

Members of the company involved in supply chain and HR are reminded to be constantly mindful of the risks of slavery and human trafficking in our business.

Staff have received training and guidance on the measures the business is taking to protect our people and our customers. These measures were kept under review and updated in accordance with the frequently changing government guidance.

We make our suppliers aware on an ongoing basis of our expectations with the use of dialogue based on the conditions of our business.

To date we have not become aware of any modern slavery cases within our supply chain but our staff must remain vigilant to ensure risks are mitigated both internally and across our supply chain.

Risk of slavery and human trafficking in our business

We will continue to work with our suppliers to ensure that to the best of our and their knowledge, our supply chain is free from abuse by slavery and human trafficking.

Whilst we have not found any ILO (International Labour Organisation) indicators of forced labour within our business or supply chain, we will keep under review the steps we are taking, and any we need to take, to ensure that there is no slavery or human trafficking in our supply chain. We acknowledge that it is not practical for us to have a direct relationship with all links in the supply chain, as this would ultimately be to the mine, utility generator etc. We expect our suppliers and those we work with to adhere to the Ethical Trading Initiative's Base Code.

We find that preparing our annual statement is a useful and thought provoking process. Modern slavery is a complex issue and can be difficult to identify. The ongoing review process is important for maintaining diligence on this issue. We are fortunate that we have not found any cases within the company, nor become aware of any within the supply chain. However we will not be complacent and will remain thorough in our response to this risk. We continue to rely on our personal knowledge of those with whom we do business and the trust we have in those relationships. We recognise the need to keep our policies and processes under review.

We have noticed that many of our national and overseas contacts have continued to use different working patterns which were first introduced by necessity due to the pandemic with many still working from home and working in a different way. We are pleased that we were able to ensure people felt safe in the ways they were working and have been able to develop procedures and protocols to work with them. We will be monitoring this during the year ahead as working patterns continue to evolve and develop globally.

This is our sixth Statement published in accordance with section 54 of the Modern Slavery Act 2015 and relates to the financial year ended 31 March 2023. It has been approved by the board of Warren James (Jewellers) Limited. It sets out the steps taken by Warren James (Jewellers) Limited and other relevant group companies, including Warren James Holdings Limited, to identify and prevent modern slavery and human trafficking in its business and supply chains.

Signed:

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[*signature on file copy but not shown on website*]
John Coulter,
Founder and Managing Director
April 2023