



## Modern Slavery Statement

Financial Year: 2026

## 1. Introduction

Boodles is committed to upholding the highest standards of ethical conduct, ensuring that modern slavery and human trafficking have no place within our operations or supply chains. This statement outlines the actions Boodles has taken to identify, prevent, and address any risks of modern slavery and human trafficking. It is made in accordance with Section 54 of the Modern Slavery Act 2015.

As a family-owned business with a history dating back to 1798, Boodles has always been guided by its core values of integrity, respect, and responsibility. We operate a network of nine stores across the United Kingdom and one in Ireland, alongside a dedicated online presence. Our commitment extends beyond the quality of our fine jewellery; we are equally devoted to ensuring the welfare of every individual involved in our supply chain.

We recognise the importance of transparency and accountability. We are actively working to ensure that our business and its supply chains are free from exploitation, and that the rights and dignity of all people involved in the creation of our products are fully protected.

## 2. Business Operations

Boodles designs and retails fine jewellery with a focus on timeless craftsmanship, quality, and ethical sourcing. Our products are sold exclusively through our retail boutiques and online channels. While Boodles does not own any part of its supply chain, we take our responsibilities as a retailer seriously, particularly in ensuring the integrity of our materials and the welfare of those involved in their production.

We have been a [proud member of the Responsible Jewellery Council \(RJC\)](#) since 2019, adhering to the highest ethical standards in our industry. We also abide by the Kimberley Process to ensure that the diamonds we source are conflict-free.

## 3. Supply Chain

Boodles sources most of its materials, including precious metals, diamonds, and gemstones, from a select group of trusted Tier 1 Suppliers—our direct suppliers—with whom we have long-standing relationships. We take pride in working closely with a small network of trusted partners, prioritising transparency and long-term relationships to ensure that our materials are sourced responsibly.

Our supply chain includes:

- Tier 1 Suppliers: Our direct suppliers, who provide finished and semi-finished materials, including cut and polished gemstones, and other essential components. These suppliers are vetted and share our ethical values.
- Tier 2 Suppliers: The suppliers of our direct suppliers, who provide raw materials or additional components that may not be directly supplied to us but are integral to the production process.

However, we recognise the inherent risks in the global jewellery supply chain and are committed to identifying and addressing any potential risks of modern slavery and human rights abuses within its supply chain.

#### 4. Supplier Policies

Boodles has implemented several key policies to mitigate the risks of modern slavery and promote ethical practices throughout its operations:

- **Code of Conduct**: In 2018, Boodles introduced a publicly available Code of Conduct, which outlines our expectations for labour rights and human rights within our supply chains. The Code specifically prohibits forced, compulsory, trafficked, and bonded labour, including the retention of identity or travel documents.
- **Exclusion Policy**: Boodles has an Exclusion Policy to avoid sourcing from countries identified as high-risk in terms of human rights abuses and corruption. This policy is reviewed regularly to ensure ongoing compliance with global ethical standards.

All Boodles suppliers must agree to our terms and conditions, which include adherence to the Code of Conduct. Suppliers are required to cascade these standards throughout their supply chains and report any potential risks to Boodles.

#### 5. Risk Assessment and Audits

Boodles recognises that the jewellery industry presents inherent risks related to modern slavery, particularly in the sourcing of precious metals and gemstones. We have a Business Continuity Team which annually meets to identify and evaluate potential risks in our supply chain and operations.

As part of our commitment to ethical practices, we take a proactive approach in assessing and reviewing our supply chain to ensure it aligns with our values and standards.

- **Supplier Assessments**: Boodles conducts assessments of its key suppliers to evaluate compliance with our Code of Conduct and identify any potential risks of modern slavery.
- **Audits**: Boodles reserves the right to conduct audits of its suppliers to ensure ongoing compliance with our policies. Where necessary, we engage independent third-party auditors to verify compliance.

#### 6. Leadership & Oversight

At Boodles, accountability for managing human rights risks starts at the highest level of the organisation. Our leadership team is committed to embedding ethical practices across the business and ensuring that all employees understand their responsibilities in upholding our human rights standards.

Roles and Responsibilities:

- **Board of Directors**: Oversees the implementation of Boodles' human rights policies and practices.
- **Sustainability and Compliance Team**: Manages the day-to-day implementation of policies, supplier engagement, and risk assessments.
- **Retail and Operations Teams**: Ensure compliance with our policies at the boutique level and during customer interactions.

Boodles also encourages its employees to raise concerns through a confidential reporting mechanism. All concerns are taken seriously and investigated promptly.

## 7. Employee and Internal Policies

Boodles recognises that promoting human rights within our organisation is essential to creating a positive and ethical workplace. We are committed to upholding the rights and well-being of all employees, ensuring that they are treated with dignity, respect, and fairness.

Our internal HR hub on the Boodles app clearly states employee rights and benefits, which are shared with all employees upon joining via the Boodles Handbook. This includes:

- **Diversity and Inclusion Policy:** Boodles is committed to providing equal opportunities for all employees, promoting diversity, and preventing discrimination in the workplace.
- **Fair Wages and Working Conditions:** We ensure that all employees receive fair wages that meet or exceed legal minimums and work under safe and supportive conditions.
- **Grievance Mechanism:** Boodles has established a confidential grievance mechanism that allows employees to report any concerns or incidents related to human rights, including potential modern slavery risks, without fear of retaliation.

## 8. Continuous Improvement Plan

Boodles remains committed to continuous improvement in its efforts to combat modern slavery and human rights abuses. Our next steps include:

- **Enhancing Due Diligence:** We will strengthen our due diligence processes for Tier 1 Suppliers on an annual basis to ensure greater transparency and accountability.
- **New Supplier Onboarding:** We will request suppliers for more detailed information about their supply chains, including any potential human rights risks. This information will be reviewed before establishing any business relationship.
- **Supplier Engagement:** We will establish continuous engagement with our suppliers on human rights issues, providing training and support where needed to improve their practices.
- **Policy Updates:** We will continue to review and update our internal policies to ensure alignment with evolving global standards and best practices.
- **Industry Collaboration:** We will continue to work with industry bodies, including the RJC, to promote ethical practices across the jewellery sector.

As a brand deeply committed to ethical luxury, Boodles will continue to work towards championing responsible sourcing practices and collaborate with industry peers to drive positive change across the jewellery sector.

## 9. Concluding Statement

Boodles is committed to acting ethically and with integrity in all our business dealings. We remain steadfast in our efforts to prevent modern slavery and human trafficking within our supply chain and to uphold human rights across our operations.

This statement has been approved by the Board of Directors and will be reviewed annually to ensure it remains current and effective.

Signed:

A handwritten signature in black ink that reads "James Amos." The signature is written in a cursive style with a large, sweeping initial 'J'.

James Amos  
*Joint Managing Director*

Signed on: 10/04/2026