

F.Hinds' Modern Slavery Statement

Modern slavery encompasses slavery, servitude, human trafficking and forced labour and is a hidden blight on our global society. F.Hinds has a zero-tolerance approach to any form of modern slavery.

This statement sets out the steps that F.Hinds Ltd. and other companies in the group (“F.Hinds”) have taken and are continuing to take to ensure that modern slavery or human trafficking does not take place within our business or supply chain.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to ensure we are alert to the risks, however small, in our business and in the wider supply chain. As with any other breach of ethical practice, staff are expected to report concerns and management are expected to act upon them.

OUR BUSINESS

F.Hinds is one of the UK's leading retailers of jewellery, watches and ancillary products. The group has its head office at 24 Park Road, Uxbridge, Middlesex, UB8 1NH, with over 120 retail outlets trading as F.Hinds or Chapelle across the UK and websites for both of these. The group has an annual turnover in excess of £70m. The business was founded in 1856 and continues to be owned and actively managed by the Hinds family, including five of the eight executive directors.

OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- This Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and where those with concerns can go for help.
- Recruitment policy. We operate a robust recruitment policy, including conducting 'eligibility to work in the UK' checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of Business Conduct. Our family name is 'above the door' and we pride ourselves on the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

ANALYSIS OF RISK

All of our outlets are in the UK, directly operated by the company and are visited regularly by directors, other senior management and have an Area Manager. We believe this to be a lower risk area than our supply chain but the same principles apply.

Our supply chain includes manufacturers of jewellery, watches, giftware and ancillary products in the UK and overseas. We operate a preferred stock supplier policy and maintain a list of these suppliers.

All suppliers are required to provide their employees with good working conditions and reasonable rates of pay, treat them fairly, respect their human rights and comply fully with all applicable laws. This anti-slavery policy is in our Supplier Manual which forms part of our contract with all suppliers.

We require them to sign acceptance of the terms of trade in our Supplier Manual, including making their facilities available for on-site audits including a review of policies and actual working conditions.

We require suppliers to comply with the Modern Slavery Act, conduct regular risk assessments within their own supply chains, implement appropriate controls, and notify us immediately if they become aware of any Modern Slavery within their organisation or supply chains.

We are only in contact with our immediate suppliers. We therefore expect each to, as a minimum, adopt 'one-up' due diligence on the next link in the chain. 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 have been members of the international ethical standards body the [Responsible Jewellery Council](#) (RJC) since 2008 and were one of the first companies in the world to be fully certified by them. The RJC requires regular independent audits of member business practices including employment. We encourage our trade suppliers to join the RJC to demonstrate their compliance but require them to behave ethically regardless of whether they are members or not. Due to the skill levels required in our industry, our UK and overseas suppliers tend to have established, experienced workforces which reduces the risk of unacceptable labour practices. In addition, in many cases our relationships with our suppliers have been established for many years or even decades. However, while we have not become aware of any incident of non-compliance either in the UK or overseas by any supplier, we understand that risk is not static, and will continue to review risks on an ongoing basis.

If a supplier was to breach their obligations to us they would face appropriate actions which could include termination of our business relationship and reporting to relevant authorities.

We encourage the reporting of concerns from staff, suppliers, customers or third parties and respect the protection of whistle blowers.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff:

- Our buyers are responsible for ensuring that our suppliers are aware of their responsibilities. Buyers are either members of the Board of Directors or directly answerable to the Board. We have conducted training for our buying team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.
- All staff responsible for recruitment have also received relevant training.
- All Directors have been briefed on the subject.

PERFORMANCE INDICATORS

We use the following indicators to measure how effective we have been to ensure that modern slavery is not taking place in any part of our business or supply chain:

- Auditing of recruitment processes by Store and Head Office Managers.
- Communication and personal contact with the next link in the supply chain, including the prospect

of visits to their operations, and confirmation of their understanding of and compliance with our expectations.

- Training for our Buying Team to enable them to remain vigilant.
- Absence of reports received from employees (both ours and those of suppliers), the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year. It sets out the steps taken by F Hinds Ltd. and other relevant group companies during the financial year ending 26th March 2023 to prevent modern slavery and human trafficking in its business and supply chains.

Approved by the Board of Directors and signed on their behalf

JEREMY HINDS

HR Director