

## Statement on slavery and human trafficking

The Board of James Finlay Limited takes compliance with its commitments under the Modern Slavery Act very seriously and many of its existing initiatives, policies and procedures go beyond the minimum standards set out in the Act.

As a business with both a history and an ethical framework of good employment practice, Finlays is committed to providing good working conditions for its employees, according to universal international standards, and to protecting their safety and health.

Finlays recognises that modern slavery as an issue has become increasingly visible, particularly in the UK, and takes seriously its moral and legal duties in this regard. Finlays has put in place measures to prevent, detect and manage incidences of modern slavery, and has engaged in this regard with a number of stakeholders including the Ethical Trading Initiative (of which it is a Group-wide member) and Stronger Together: an organisation focused on raising awareness of and providing training for the prevention of modern slavery.

We have initiated a number of steps across the Group to ensure we go beyond mere compliance, including:

- Conducting modern slavery risk assessments within all our businesses around the world;
- Use of risk assessment data to identify priorities and develop actions for the detection and management of forced labour across the Group;
- Best practice training for our management teams most likely to encounter potential issues with regard to modern slavery;
- Development and communication of a Group policy on modern slavery; and
- Inclusion of modern slavery in our internal audit risk cycle.

As part of our ongoing commitment, we will continuously review our approach to modern slavery.

More broadly, Finlays' plan for the prevention and management of modern slavery sits within the context of Finlays' wider commitment to running a sustainable business.

### **Sustainability, values and the commitment to people**

The Finlays' Sustainability Strategy was developed and signed off by the Board in 2009. The strategy covers all areas of the Finlay business and is intended to frame the future direction of the company, to ensure its long-term resilience and success.

The strategy is comprised of a vision and five key commitments, developed as the bedrock for a long-term future. They relate to business, environment, people, communities and partners and product. Each commitment comprises a number of more detailed objectives. Our people commitment is the one most relevant to the avoidance, detection and management of any incidences of modern slavery. It is:

**“We strive to make Finlays an enjoyable and rewarding place to work, that nurtures and develops our people for the benefit of the individual, the company, and the community.”**

The objectives underlying the People commitment are:

- Employ our workforce according to universal international standards
- Protect the health of our workforce and promote healthier lifestyles
- Treat our employees fairly, with dignity and respect
- Develop our employees’ life and business skills
- Empower all our employees to make their voices heard through democratic worker representative bodies
- Demonstrate leadership in equal opportunity employment, thriving as an ethnically and culturally diverse company
- Encourage and facilitate female representation and their contribution to the business
- Reward our employees for achieving the company’s business objectives
- Educate our employees on the values and principles of sustainable development

Finlays takes the view that the challenge of combatting modern slavery and human trafficking is an ongoing one, but one we are committed to.

A handwritten signature in black ink, appearing to read 'Guy Chambers', with a horizontal line underneath it.

Guy Chambers  
Group Managing Director on behalf of the board of James Finlay Limited