

BOODLES

1798

Modern Slavery Act Transparency Statement

Boodles

(Boodle & Dunthorne)

November 1, 2018

Boodles, founded in 1798, is a sixth generation family-owned and run fine jewellery designer and retailer. It operates eight stores in the United Kingdom and one in Ireland. The company only operates retail stores and does not own any part of the supply chain. Boodles is committed to upholding high ethical standards and human rights.

Diamonds are the largest material that Boodles sources by both volume and by value. Boodles sources semi-finished materials - primarily cut and polished diamonds - from a select group of suppliers with whom the company has long-standing relationships. Boodles jewellery products are crafted in a small selection of workshops for Boodles retail stores.

In 2018 Boodles launched a new Code of Conduct, publicly available on the company website, which covers expectations of labour rights and human rights in its supply chains, including a provision on forced, compulsory, trafficked and bonded labour (including the retention of identity or travel documents). Boodles requires its suppliers to abide by terms and conditions, which include the application of the Code of Conduct within their respective business and supply chains. Boodles has also introduced an Exclusion Policy to restrict sourcing from what are deemed as very high-risk countries in respect to human rights and/or corruption.

Boodles has engaged with all of its existing key suppliers to assess risks in their respective supply chains in 2018 and will continue to do so on an annual basis. For new suppliers Boodles requires that they provide information about their supply chain, assess human rights and labour rights risks (including modern slavery), and report any present or future risks to Boodles. Boodles reserves the right to conduct audits of all of its suppliers.

Future plans include: training of Boodles staff, and annual reporting on all of the company's efforts related to human rights risks and due diligence.



Michael Wainwright
Managing Director



Nicholas Wainwright
Chairman



Jody Wainwright
Director



James Amos
Director