

The Watch Lab Holdings Limited

Modern Slavery Act 2015 – Transparency Statement for the Financial Year 2018-2019

Introduction

At The WATCH Lab, one of our Values is to do the right thing, and as a business we do our best to live up to this standard. This Value commits us to being fair, reasonable and responsible in all of our interactions. We would certainly never knowingly engage with a supplier that was in any way involved in human trafficking, servitude, forced labour or any other aspect of modern slavery. However, we recognise that such people and organisations will take steps to conceal the true position, meaning that vigilance is always necessary.

Geographical reach of our supply chain

We source our products from a number of countries around the world, principally:

| | | |
|----------------|-------------|---------|
| United Kingdom | Switzerland | Germany |
| China | Japan | Italy |

Responsible Jewellery Council

In respect of our Financial Year 2018-2019, we are part of a group of companies that benefits from membership of the Responsible Jewellery Council (RJC). This is an independent body that carries out comprehensive audits of its members and aspiring members, to ensure that they met its exacting standards of business practice, not least in relation to the treatment of their employees.

Our Code of Conduct

If a supplier is a member of the RJC, this will naturally give us a good deal of confidence that its products are not tainted by modern slavery or other unacceptable practices. However, not all of our suppliers have this membership, and we therefore need to take further steps to obtain the necessary assurances. To that end, we have a Code of Conduct, which we provide to all of our suppliers of watches, parts and equipment. We ask our suppliers to return a letter of acceptance to confirm that the supplier, and its staff, will comply with the specifications and requirements set out in the Code of Conduct.

This Supplier Code of Conduct, which contains twelve principles:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed
- Responsible environmental practices
- Zero tolerance of conflict products
- Compliance with the Code of Conduct itself

Staff awareness

Our buyers and administrators are made aware of our Code of Conduct and its requirements, and we explain it to any new recruits to those teams, as part of their induction process. We have a whistleblowing policy in place and our employees are encouraged to inform us if they suspect unacceptable practices, whether within our own business or our suppliers.

I confirm that this statement has been approved by the board of directors of The Watch Lab Holdings Limited.

A handwritten signature in black ink, appearing to read 'AR', written in a cursive style.**Anders Romberg****Director****29 October 2019**