

GEMPORIA

GEMPORIA LIMITED:

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED March 2019 ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

Our business:

Gemporia Limited is a UK based employee-owned business that sources gemstones across the globe in order to create beautiful jewellery. We aim to be original, inspiring and ethical. We believe that beautiful jewellery shouldn't cost the earth, nor should it be mass produced or run of the mill. We passionately believe that jewellery should leave a legacy, for those who wear it and those who help to make it. We use only genuine gemstones and precious metals to make our jewellery in limited runs, finished using the same skilled process to the same high quality. Each piece comes with a guarantee, and we're always listening to your feedback to help us improve, grow, and create the jewellery you want to wear. We make and sell our designs both on www.gemporia.com and through our TV channels.

Our supply chains:

Our supply chains include: gemstone sources, jewellery manufacturing and packaging manufacturing. The majority of our supply chain is conducted offshore.

Our policies on slavery and human trafficking:

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our company handbook and supplier agreement reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business and in our supply chains

Supplier adherence:

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant country of operation. We have in place a supply chain agreement that is maintained by the Head of Supply Chain and Operations Director. This consists of supplier reviews; audit; and self-certification declarations.

Policies:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we have in force the following policies:

- Anti-Slavery and Human Trafficking Policy
- Ethical Trade (supplier pack):
- Equal Opportunities policy
- Ethics, Conduct, Anti-Bribery and Anti-Corruption policy (includes whistle blowing)
- Health & Safety policy

Due diligence processes:

As part of our initiative to identify and mitigate risk, we undertake due diligence when taking on new suppliers and regularly review existing suppliers. This includes:

- Broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier via a prequalification questionnaire and reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Conducting on-site supplier audits, which have a degree of focus on slavery and human trafficking especially where geographically suppliers are considered to be higher risk.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Steps to assess and manage risks:

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains and protect whistle blowers.

We have a zero tolerance approach to slavery and human trafficking. To ensure that all those in our supply chain comply with our values, we have implemented processes to:

- Clearly communicate our expectations to our supply chain in respect of sustainability, anticorruption and bribery and ethical procurement;
- Encourage our suppliers to cascade a similar process and expectation within their own business and supply chain;
- Ensure adherence to our policies at supplier selection, on-boarding, risk analysis, performance measurement and continual assessment, ensuring that adherence to our policies is a contractual obligation in our agreements with suppliers.

We recognise and understand the importance of the Modern Slavery Act and are committed to reviewing and assessing the risks in our supply chain. Over the course of the coming financial year, we will continue to review our supplier contracts and procurement processes to ensure continued compliance with the Modern Slavery Act.

Mark Jackson, Operations Director

26th March 2019