



MODERN SLAVERY TRANSPARENCY STATEMENT

This statement constitutes the Berens Group's statement on slavery and human trafficking under section 54 of the Modern Slavery Act 2015 for the financial year ended 30th June 2019. This statement sets out the steps that the Berens Group has taken and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Berens Group's Structure

Berens Group Limited is a provider of exceptional quality jewellery and luxury Swiss watches, trading from several locations in the United Kingdom. The Berens Group is a family owned business founded in 1897 and has an annual turnover in excess of £40 million. The business remains firmly rooted in family values and tradition, originally from just one small store in Leeds to, presently, fourth generation owners with nine stores and two internet sites.

The Berens Group refers to the following group companies:

1. Berens Group Limited;
2. Berens & Company Limited;
3. Eaglesure Limited;
4. Inglis and Son (Jewellers) Limited;
5. Jeffrey Walton Jewellery Limited;
6. John Dyson & Sons Limited;
7. Link Jewellery Limited;
8. Saul Bercott Limited;
9. Walton (Packaging) Limited; and
10. World Centre Sales Limited.

Modern Slavery

We understand that modern slavery is a crime and a violation of fundamental human rights and we have a zero-tolerance approach to slavery and human trafficking. Modern slavery takes various forms such as slavery, servitude, human trafficking and forced labour. We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed 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 is not taking place anywhere in our supply chains.

Our Policies on Slavery and Human Trafficking

We have an internal policy to ensure that we are conducting business in an ethical and transparent manner. We have implemented an Anti-Slavery and Human Trafficking policy and a standard questionnaire for completion by our new and existing suppliers which reflects our commitment to acting ethically and with integrity in all our business relationships.

Our Supply Chain

Our supply chain includes manufacturers of jewellery, watches and ancillary products. We purchase directly from manufacturers which include Swiss watch manufacturers and luxury jewellery suppliers. We trade with reputable manufacturers and suppliers and review their modern slavery policies as part of our supplier selection.

Our Suppliers

To ensure all those in our supply chain and contractors comply with our values, we have recently created a questionnaire for new suppliers to complete prior to contracting with them and we will be carrying out due diligence on existing suppliers using this questionnaire to ensure they are compliant with our standards.

The Berens Group and its suppliers and partners will:

1. not used forced or compulsory labour, i.e. any work or service that a worker performs involuntarily or under threat of penalty;
2. ensure that the overall terms of employment are voluntary;
3. not hold passports of migrant workers;
4. comply with the minimum age requirements prescribed by applicable laws;
5. compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay agreements;
6. abide by applicable law concerning the maximum number hours of labour; and
7. keep records of and be entirely transparent in complying with the above.

Next Steps

We have reviewed our supply chain protocols and continue to take the measures set out in this statement to reduce our exposure to modern slavery and human trafficking issues.

The specific measures we are taking through the next financial year include:

1. continuing to identify and assess any key risk areas in our supply chains;
2. reiterating to all our current critical suppliers their required compliance with our zero-tolerance approach to human rights abuses and, where appropriate, requesting details of their due diligence procedures both for internal compliance and within their own supply chains;

3. providing training for all our managers, both new and existing, on our new Anti-Slavery and Human Trafficking policy;
4. provide all staff with a copy of our new Anti-Slavery and Human Trafficking policy, accompanied by an internal memorandum to assist understanding and to express the importance of this policy and will make it available on our notice boards and intranet where possible.

Board Declaration

This statement has been approved by the Berens Group Limited's board, who will review and update it annually, and has been personally executed by Simon B Walton, Managing Director.



1/8/2019.