

ASTLEY CLARKE

Annual Report Statement

As a member of the Responsible Jewellery Council (RJC), Astley Clarke Limited is committed to implementation of the [Code of Practices \(COP\) standard](#) and as such we have developed a range of policies and procedures to ensure our ongoing compliance with its requirements.

We are also committed to developing and nurturing strong relationships with suppliers and other business partners to promote responsible business practices throughout our supply chain. This includes taking steps to identify and, where applicable, mitigate negative social and environmental impacts with a particular focus on addressing issues related to human rights, child labour and forced labour.

To achieve this, we carry out due diligence on all of our suppliers in alignment with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). In 2021 we took the following initial steps on this journey:

- Adopted a supply chain policy in alignment with the OECD Guidance which is available on our website <https://www.astleyclarke.com/media/cms/sustainability/Astley-Clarke-Responsible-Business-Commitments.pdf>
- Developed internal control systems and processes for collecting and recording information on the origin of jewellery materials supplied to us and, where available, information relating to due diligence carried out by suppliers.
- Reached out to all of our suppliers to request information.
- Developed a system for identifying risks in our supply chain and 'red-flag locations'.

To understand the potential and/or actual human rights risks that might be present in our upstream supply chain, we asked all of our suppliers to complete a survey questionnaire. This questionnaire asked suppliers to provide information on their legal compliance, labour practices, controls to manage child and forced labour risks, how they manage their impacts to the environment, the controls they have in place to ensure adequate workplace health & safety and the due diligence processes they have in place to address risks related to minerals originating from Conflict-Affected and High-Risk Areas (CAHRAs).

All of our current suppliers are certified members of the Responsible Jewellery Council (RJC) and as such we found that they all had broadly strong management systems in place to address social and environmental risks. In particular, we did not identify any significant concerns regarding the human rights or labour practices of our direct suppliers.

In addition to this, we have taken steps to identify the geographical origin of materials in our jewellery products. We were able to identify that all of the precious metal refiners in our supply chain have undergone independent third-party audits in alignment with the OECD Guidance. We have also been able to identify the origin of some of our other jewellery materials, such as emeralds, sapphires and rubies. This process is still ongoing and we will continue to work closely with our suppliers during 2021 and beyond to further enhance transparency of our supply chain and, where applicable, manage and mitigate identified risks.

In addition to the above we have also implemented processes and controls to manage the environmental impacts of our direct business operations. This has included implementing measure to minimise waste, increase recycling of paper and the implementation energy efficiency measures. During 2021 we will continue to seek opportunities to improve our environmental performance.