

## UK MODERN SLAVERY ACT 2019 STATEMENT

### INTRODUCTION

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps FRED PARIS and its affiliates, including which FRED Londres Ltd. (hereafter referred to together as “**FRED**”) have taken during the financial year ending 31 December 2019 to ensure that slavery, servitude, forced or compulsory labour, and human trafficking (collectively, “**Modern Slavery**”) is not taking place in any part of their business or in their supply chains.

### BUSINESS

FRED is affiliated to the LVMH Moët Hennessy Louis-Vuitton SE (“**LVMH**”) Group. FRED designs, manufactures, sells and distributes high-quality watches and jewelry under the internationally renowned luxury brand FRED (hereinafter the “**Products**”).

FRED purchases:

(i) gems and stones, semi-finished and/or finished Products from suppliers located essentially in Italy, France, Germany, Spain & Switzerland; and

(ii) marketing, packaging and Point of Sale Material from suppliers located in various European and overseas countries.

### POLICIES AND PRACTICES

FRED’s commitment is to act with integrity in all its business dealings and to promote ethical conduct, to enhance compliance with applicable laws and to provide guidance with respect to business conduct. It has a number of policies that are relevant to this commitment, which set out what FRED expects from its employees, internal business and its external suppliers.

Key Policies are:

- 1. FRED Suppliers' Code of Conduct ("Suppliers' Code of Conduct") available upon request and on fred.com website

FRED expects its suppliers to share its commitments and act in full compliance with the relevant laws, including all national, local and international laws relating to the management of their businesses. FRED requires its suppliers to seek approval before subcontracting any part of their supply chain process and FRED’s approval is subject to acceptance by the subcontractor of the Suppliers' Code of Conduct and all other applicable conditions that FRED determines.

FRED reiterates the LVMH Code of Conduct and commitment to act to the highest standards of integrity, respect and engagement in their behaviours and in the way that they conduct business every day, everywhere. This code further states that the group companies will inform all its commercial partners of its ethical principles and expectations and will ask its suppliers to comply with the principles set out in the Suppliers' Code of Conduct.

In particular, this code specifies compliance with social issues to abide, respect and adhere to the company moral and ethical values in the management of the company concerning Human Rights, working Conditions and environmental issues.

- 2. Responsible Jewellery Council Certification

The Responsible Jewellery Council (RJC) is a not-for-profit organisation that has been established to promote responsible ethical, social and environmental practices, which respect human rights, throughout the Diamond, Gold and Platinum Group Metals Jewellery supply chain, from mine to retail. FRED is a RJC Member since 2011.

RJC Members commit to and are independently audited against the RJC Code of Practices – an international standard on responsible business practices for diamonds, gold and platinum group metals. The Code of Practices addresses human rights, labour rights, environmental impact, mining practices, product disclosure and many more important topics in the jewellery supply chain.

The RJC Code of Conduct is available at:

<https://www.responsiblejewellery.com/files/RJC-COP-April-2019.pdf>

#### SUPPLIER AND CONTRACTOR DUE DILIGENCE

FRED ensures that its new suppliers are carefully chosen and that, prior to entering into any new contractual relationship with a supplier or a contractor, suppliers and contractors are complying with FRED's Code of Conduct. FRED requests its contractors and suppliers to comply with FRED's Code of Conduct at all times during their commercial relationship.

#### TRAINING AND AWARENESS

FRED conducts regular training for its employees to ensure legal and human compliance across FRED. The training enables FRED to reduce business risk of non-compliance through efficient processes and reliable data and reporting.

FRED's aim is to eliminate any risk of Modern Slavery in its business operations and in its supply chains.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes FRED's slavery and human trafficking statement for the financial year ending 31 December 2019.

Approved by the Board of Directors of FRED Paris on 21 April 2020 and of FRED Londres Ltd.

And signed on their behalf by:

**Charles Leung**  
**President**

