



UK MODERN SLAVERY ACT 2015 2022 STATEMENT

INTRODUCTION

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps FRED PARIS SA and its affiliates, including FRED Londres Limited (hereafter referred to together as “FRED”) took during the financial year ending 31 December 2022 to combat the risk of slavery, servitude, forced or compulsory labour or human trafficking (collectively, "Modern Slavery") taking place in any part of their business or supply chains.

BUSINESS

FRED remained affiliated to the LVMH Moët Hennessy Louis-Vuitton SE (“LVMH”) Group. FRED continued to design, manufacture, sell and distribute high-quality watches and jewellery under the international luxury brand, FRED, (hereinafter the “Products”).

FRED purchased: gems and stones, semi-finished and/or finished Products from suppliers located essentially in Italy, France, Germany, Portugal, Belgium, Spain & Switzerland; and marketing, packaging, and Point of Sale Material from suppliers located in various European and overseas countries.

POLICIES AND PRACTICES

FRED’s commitment 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 remained undiminished throughout the year. It had a number of policies that are relevant to this commitment, which set out what FRED expected from its staff, suppliers, and their supply chains.

Key Policies:

- 1. LVMH Group Supplier Code of Conduct (the “Code”) available upon request

The Code was updated in 2022. It applied (and continues to apply) to Maison FRED and all LVMH Group Maisons, The Code accordingly helps Maisons maintain a consistent approach to their suppliers and supply chains, including in relation to combating the risk of modern slavery.

The Code had to be signed by all new stakeholders and/or for all new contracts. Its signature by a supplier is valid for every Maison.

The definition of suppliers in the Code is non-exhaustive and includes landlords for the first time.



The Code includes a number of new and updated commitments to reflect changes in the law and environmental & societal norms. One new commitment is to help protect local or indigenous communities.

The Code required suppliers to commit to implementing an alert line for their own workers and stakeholders. It provided suppliers with access to the Independent Third Party Alert System.

Penalties for non-compliance of the Code include the right of FRED to terminate the business relationship (subject to compliance with legal duties and obligations).

FRED continued to require its suppliers and their supply chains 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 business. FRED required its suppliers to seek approval before subcontracting any part of their supply chain process and FRED's approval was subject to acceptance by the subcontractor of the Code and all other applicable conditions that FRED determined.

- 2. Responsible Jewellery Council Certification

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

RJC Members commit to and are independently audited against the RJC Code of Practices – a rigorous international standard on responsible business practices for diamonds, gold, and platinum group metals. The certification audit takes place every three years.

The Code of Practices address human rights, labour rights, environmental impact, mining practices, product disclosure and many more important topics in jewellery supply chains.

The RJC Code of Conduct is available at:
RJC-COP-2019-V1.2-Standards.pdf (responsiblejewellery.com)

- 3. LVMH Group Whistleblowing Alert System

All Fred staff had easy and confidential access to the LVMH Group Whistleblowing Alert System.

This encouraged them to identify and raise concerns of past, present, or future wrongdoing, including any related to modern slavery within FRED or our supply chains, using appropriate, confidential channels.



All new starters received information on our Whistleblowing system as part of their onboarding process.

No instances of modern slavery were found within FRED or the company's supply chains but we are not complacent.

SUPPLIER AND CONTRACTOR DUE DILIGENCE

FRED continued to ensure that its new product suppliers are carefully chosen by committee which analyse its suitability and that, prior to entering into any new contractual relationship with a supplier or a contractor, suppliers, and contractors complied with FRED's Code of Conduct. FRED required its contractors and suppliers to comply with FRED's Code of Conduct at all times during their commercial relationship including by providing training such as anti-corruption training. We asked our suppliers to sign the Code of Conduct - it is requested in order to create a supplier account in our system (ERP). Every year Fred sends a Self-Assessment Questionnaire to existing suppliers to update their information. An updated template was created this year.

TRAINING AND AWARENESS

FRED conducted regular training for its employees to ensure legal and human rights compliance across its business and ensured it meet or exceeded RJC standards which it communicated to all its employees. The training enables FRED to reduce business risk of non-compliance through awareness, efficient processes and reliable data and reporting.

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 2022.

The Boards of Directors of FRED Paris SA and of FRED Londres Limited have approved this modern slavery statement and it has been duly signed by the following Director:

Charles Leung, President

Date: 21st June 2023