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SMYTHSON

OF BOND STREET

MODERN SLAVERY STATEMENT

Introduction from the Board of Directors

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We at Frank Smythson Limited are committed to continually improving our practices to combat slavery and human trafficking and can confirm that Modern slavery is not taking place in any part of our business or in our business chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2021.

Organisational structure

Frank Smythson Limited is an iconic British brand with an extraordinarily rich heritage. Established in 1887, and holding 3 Royal Warrants, Smythson represents over 130 years of British luxury leather goods at their most refined. Each and every piece is exclusively produced under the eye of the expert and the hand of the artisan: from the meticulous design of our handbags to our iconic bespoke stationery department, Smythson's distinction lies in the detail.

We trade globally, currently with stores across London, Paris and New York, along with fast growing eCommerce and wholesale channels. The company has 223 employees operating throughout the business.

Our supply chains, policies and procedures

Frank Smythson Limited are dedicated to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues

Our workplace policies and procedures demonstrate 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 is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risks, we ensure that all employees:

- Have a right to work in the UK. This involves asking the individual directly to view their passport. A
 delay in providing the passport might indicate a modern slavery issue
- We check that each employee has a bank account in their own name into which their remuneration is paid
- In addition, our employees, through the Employee Handbook, are made aware of the Company's requirement for employees to support and uphold human rights principles and know that Frank Smythson Limited will not tolerate, engage in or support the use of forced labour.
- All employees are provided with a clear contract of employment

Supplier adherence to our values

Frank Smythson Limited makes clear our position of zero tolerance to Modern Slavery and Human Trafficking to all suppliers and contractors, reporting any suspicion of such to management. Through our sister company Tivoli Group SPA, our leather goods suppliers in the supply chain are audited to ensure there is a limited risk of labour exploitation and we require all suppliers and contractors to confirm they are complying with the Suppliers Code of Conduct.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Frank Smythson Limited's slavery and human trafficking statement for the current financial year end 31.03.2021

Approved by

Xavier Rougeaux

CEO