

UK Modern Slavery Act and California Transparency in Supply Chains Act Statement

INTRODUCTION

This statement is made pursuant to the California Transparency in Supply Chains Act 2010 and Section 54 of the UK Modern Slavery Act 2015. It sets out the steps that Bucherer Group and its subsidiaries have taken during its financial year ending December 31, 2022 to mitigate potential risks of slavery, servitude, forced or compulsory labor and human trafficking (collectively “Modern Slavery”) in any part of its business or supply chain.

This statement relates to all our companies operating in the UK, Europe, Switzerland and the United States.

THE BUCHERER GROUP– your jeweler for luxury watches and jewelry

Bucherer has one of the most distinguished traditions in Europe’s watch and jewelry industry. During a history that spans over 130 years, Bucherer has established an exclusive reputation for its range of exquisite jewelry and prize-winning creations. Bucherer’s global head office remains in the Swiss city of Lucerne to this day, and the company employs more than 2,000 staff in seven different countries. The Bucherer Group runs over 100 points of sale in Europe and North America.

Our procurement team is based in Lucerne and Lengnau, our offices in Switzerland for both Bucherer Fine Jewelry and Carl F Bucherer products.

COMMITMENT TO ACT WITH INTEGRITY IN THE CONDUCT OF BUSINESS

At Bucherer, we are guided by our values of inspiration, excellence, speed, accountability and inclusion. For the purposes of our [Code of Conduct](#) including the Bucherer [Integrity Line](#) which is our external and internal grievance mechanism for raising concerns, our [Responsible Sourcing Policy](#) and our [Supplier Code of Conduct](#) detailing our commitment to supply chain transparency, we are led by Bucherer’s core value of **accountability**. These policies are publicly available at <http://www.bucherer.com>.

We take responsibility for our actions and expect the same of our business partners. This means we foster an inspiring and respectful work environment. Bucherer is committed to ensuring a diverse and inclusive environment, where people have the confidence to express their identities and embrace their individuality. Our employees enjoy their rights irrespective of gender identity, age, religion, race, national origin, sexual orientation, physical ability or any other aspect of diversity. Bucherer does not tolerate any form of physical, sexual, verbal or psychological violence and harassment. In order to maintain this environment of trust, we have implemented efficient systems upon which we rigorously work to improve, such as our Integrity Line and targeted training programmes. These measures enable us to create transparency within our company.

RESPONSIBLE SOURCING

Bucherer is committed to conducting our business responsibly. Our commitment to respect human rights applies to Bucherer’s own operations and our value chain worldwide. We predominantly operate in countries where high social standards apply, however we recognize the high risk of human rights violations within our supply chain. In 2022 we have therefore written the [Responsible Sourcing Policy](#) and the [Supplier Code of Conduct](#), which ensures that ethics are maintained within every product that Bucherer sources and creates under the Bucherer name.

Bucherer is committed to the protection of human rights, including the rights of children, with a particular focus on the challenges of sourcing in conflict affected high risk areas (CAHRAs) in accordance with:

- United Nations (UN) Universal Declaration of Human Rights
- International Labour Organization (ILO)
- UN Guiding Principles on Business and Human Rights (UNGPs)
- United Nations (UN) Children's Rights and Business Principals
- United Nations (UN) Conventions on the Rights of a Child

These standards are central to our responsible business policies and are the foundation for Bucherer's [responsible sourcing commitments & policies](#).

Our commitment to eliminating modern slavery, human trafficking, and forced labor is also reflected in the [Bucherer Group Supplier Code of Conduct](#). The Supplier Code of Conduct sets out the principles and requirements that are applicable to all suppliers with respect to:

- Treating people with Fairness & Respect
- Protecting the Health and Well- Being of the Workplace and the Environment
- Acting With Integrity
- Supply Chain Management: Managing the Key Risks Associated with our Suppliers

With respect to our multi-brand retailing operations, the majority of our watch and jewelry suppliers are accredited members of the RJC (Responsible Jewelry Council) and, as such, are subject to rigorous independent audits to ensure compliance with the RJC's standards of business practice, which include a particular emphasis on human rights.

TRAINING

All employees are required to complete training on our Code of Conduct. Our Code of Conduct requires all employees of Bucherer to comply with all applicable laws and regulations, including but not limited to those relating to human trafficking and slavery.

OUTLOOK FOR 2023

Bucherer believes in protecting and enhancing the lives of our people across our business and our global value chains. We have an ongoing commitment to conducting our business in a socially responsible manner and to prohibiting modern slavery. Bucherer *'...treats everyone with respect and protects all employees from unfair, unsafe or unethical working conditions and operate our business with the belief that 'knowledge sharing and open communication defines our way of working'*.¹

We recognize that no economy or industry is immune to the issues of modern slavery and human trafficking. Therefore, we strive to ensure that they do not exist in any part of our business or value chain.

¹ [Bucherer Code of Conduct](#)

Looking ahead to 2023, Bucherer will take further steps to prevent Modern Slavery in the Group and improve transparency throughout our supply chain in the future. We are in the process of implementing our [Supplier Code of Conduct](#) and all suppliers are required to comply with the Supplier Code of Conduct as a part of our purchasing agreements.

We have developed, are currently training our teams, and implementing our Responsible Sourcing and Supply Chain Transparency Initiatives based on the OECD (Organization for Economic Cooperation and Development) Guidance for the Responsible Sourcing of Minerals and Metals from Conflict Affected and High - Risk Areas. Our framework and action plan for identifying and managing the key risks associated with our supply chain, from supplier due diligence, selection and monitoring, through to disengagement – is adapted from the OECD **five step framework**:



We are strengthening our management systems and human rights due diligence processes in order to prioritize our most salient issues and accordingly develop strategies that will allow us to prevent, mitigate and in cases where necessary, remediate any potential human rights risk.

The Right to Audit is part of both our Supplier Code of Conduct and our General Terms & Conditions: we may conduct or commission an independent third-party to conduct scheduled or unscheduled on-site audits of the Supplier to, inter alia, review the Supplier’s performance, the Supplier’s compliance with our Terms & Conditions and our Supplier Code of Conduct. The supplier’s signature **certifies** their compliance with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Without these signed documents we will not enter a business relationship with the supplier.

If we become aware of facts or circumstances that, in our reasonable determination, indicate that a supplier has breached, or may breach our Responsible Sourcing Policy or Supplier Code of Conduct we shall be entitled to terminate our agreement(s) with that supplier by written notice, without prejudice to any other remedy we may have.

We will continue to move towards greater transparency and traceability within our supply chain, as well as within our business operations. [The Bucherer Code of Conduct](#), our [Responsible Sourcing Initiatives](#), and [Bucherer’s Integrity Line](#), accessible to both internal and external stakeholders, as well as other valuable tools will assist us in the promotion of ethical standards and socially responsible management practices throughout our entire

supply chain and to improve awareness of modern slavery and human rights risks in our operations.

This statement was approved by the Executive Board on March 8, 2023 and the information contained in this Statement is accurate as of that date.

Guido Zumbühl
CEO Bucherer Group