



# ANGARA

## MODERN SLAVERY ACT STATEMENT - UK

This statement sets out Angara's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and its supply chains. This statement relates to actions and activities during the financial year 2024-2025.

As a part of the Jewellery ecommerce industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### OUR BUSINESS

Angara, established in 2005, is a globally recognized luxury jewellery ecommerce brand with offices in Los Angeles and London, operating online worldwide. Aligned with the UN Sustainable Development Goals, particularly SDG 8, we prioritize decent work and economic growth, exemplified in our operations and value chain.

### OUR SUPPLY CHAIN

Respecting all stakeholders, our supply chain involves approximately 10 Tier 1 suppliers of precious metals, gemstones, and diamonds, mainly located in India, Thailand, and USA. We enforce a Supplier Code of Conduct, undergo regular audits, and conduct human rights impact assessments to mitigate the risk of modern slavery and human rights abuses. Recognizing the heightened risk of modern slavery and human rights abuses within overseas operations, we have implemented rigorous processes including regular site visits, independent audits, and human rights impact assessments to mitigate these risks.

### POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

**Whistleblowing policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Supplier code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

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## **Human Rights Policy:**

Our Human Rights Policy underscores our firm commitment to upholding industry best practices and integrating human rights considerations across all facets of our company's operations and employment practices, as well as those of our supply chain partners. We adamantly oppose coerced or forced labour and child labour, discrimination, and harassment. Furthermore, we champion diversity, freedom of association, and strive to ensure safe and healthy workplaces across all our sites and within our supply chain. Any breach of this policy, whether in our operations or supply chain, will be thoroughly investigated, appropriately reported, and may lead to the termination of relationships with offending suppliers or employees. We recognize the complexity of human rights issues and prioritize engaging with and supporting our suppliers and communities to find sustainable solutions.

## **Equality, Diversity and Inclusion Policy:**

In addition to our Human Rights Policy, we have an Equality, Diversity, and Inclusion Policy that reinforces our commitment to these principles in our day-to-day operations. This policy affirms our dedication to actively promoting diversity and inclusion, maintaining discrimination-free workplaces, fostering inclusive environments where every individual's contribution is valued, and creating a culture where employees feel safe reporting any violations.

## **RISK ASSESSMENT AND DUE DILIGENCE**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Conducting supplier audits or assessments whenever required.
- Creating an annual risk profile for each supplier;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditors and requiring them to implement action plans;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- Using details of ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

## **TRAINING AND AWARENESS**

The organisation requires all staffs and supply chain managers within the organisation to complete training on modern slavery as a module within the organisation's wider human rights/ethics/ethical trade training programme

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The organisation's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following key performance indicators (KPIs) to measure how effective we ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of audits by Branch Managers, Directors and the Human Resource Manager;
- Use of staff monitoring and payroll systems; and
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

### **NEXT STEPS**

Angara remains steadfast in implementing our human rights policy concerning the risks within our supply chain. We are devoted to enhancing our risk assessment procedures to detect, address, and manage risks across both our supply chain and internal operations more effectively. We will persist in encouraging our supply chain partners to conduct thorough due diligence on their own operations and those of their suppliers.

This statement covers the year 2024 and has been approved by the Board of Directors of Angara, UK Ltd. on 30 May 2024.

Ankur Daga

Director

Angara UK, Ltd.