

ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

2021/22

ASPREY INTERNATIONAL LIMITED

ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

Asprey International Limited is committed to operating its business at best practices standards on environmental, social and governance matters.

Asprey appreciates that its corporate activities have an impact on the environment, we are committed to minimizing this impact wherever practicable. Asprey recognise that all staff, contractors, suppliers, and visitors have a responsibility to play their part in achieving this goal and that they have a good understanding of the practices Asprey undertakes to reduce its impact on the environment.

Asprey is also fully committed to ensuring that its manufacturing supply chains across all categories are free from human rights and modern slavery abuses as well as adhering to sustainable and ethical manufacturing and sourcing of raw materials. As a Royal Warrant Holder and a heritage brand in existence since 1781, Asprey has a code of standards, principles, and legislation that we expect the suppliers and partners of Asprey branded products, as well as the subcontractors in the supply chain to follow.

To this end the Company is committed to:

- Adapting a reasonable and sustainable approach to conservation.
- Continuing to carry out effective waste management and recycling practices throughout all areas of the business.
- Minimizing harmful emissions released into the atmosphere and to help to conserve valuable resources for future generations through improvements in energy efficiency.
- Increasing the awareness of environmental & social responsibilities amongst staff, contractors, visitors, and clients.
- Considering environmental factors in re-development and new build projects (such as Pop Ups/New Store openings)
- Meeting the requirements of relevant legislation and striving for the continual improvement of environmental performance.
- Ensuring that we are working alongside suppliers who are registered, assessed, and hold the relevant certification and who adhere to current environmental and social legislation.
- Ensuring that products and raw materials are well governed by official parties, corporations and reviewed to ensure updated practices and standards are monitored and kept at their highest levels.
- Championing diversity, equality and inclusion and empowering young people in our communities and industry.

Approved by Owner & Chairman John Rigas, 2022

ENVIRONMENT

ENVIRONMENT COMMITTEE

Asprey is firmly committed to reducing its Environmental impact and to assist the company in achieving this goal has a formed environmental committee with a dedicated team from various departments across the business, overseen and Chaired by the Operations and Facilities Director, Robert Fitzpatrick. The team regularly monitors reviews and implements changes with cost effective, environmentally friendly solutions with the main aim of reducing our carbon footprint across the business and in all global locations.

This committee meets quarterly and includes business stakeholders and key decision makers across Asprey's product categories and management of Asprey's supply chain and key decision makers. The meetings are formally documented, and an annual review* is circulated to all staff to report on progress and show achieved initiatives. The terms of reference for the Committee are:

- To advise Management Board on environmental related matters affecting the Company (International)
- To monitor, review and make recommendations to minimise / reduce where practicable the environmental impact of the Company's operations, policies, and procedures.
- To develop, implement and monitor the Company's Environment/Social Strategy

The Committee closely monitors:

- Recycling and waste
- Energy and water
- Supply Chain Management
- Plant and machinery (Asprey Workshops)

ASPREY KEY IMPACTS

Asprey has identified the key impacts and issues on the environment based on Asprey's activities. These cover a wide range of issues including the use of renewable natural resources, extraction of raw materials, supply chain management, minimization of waste, a high standard of treatment for people working for and indirectly working for Asprey and standards of animal welfare.

Over the last five years Asprey have taken positive steps to change our approach to the way in which we conduct our day-to-day activities related to the main products and services that are utilised by the business, ensuring that we are consciously reducing our impact both locally and globally.

Our key challenges are;

- Effective supply chain management – employment and management of suppliers
- Waste Generation (chemicals and hazardous substances generated by our workshops) and general business waste including the use of paper & packaging
- Use of Natural Resources - raw materials (Leather) and precious stones and metal (Jewellery)
- Reducing our International Carbon Footprint

IMPACTS: Effective Supply Chain Management (Employment and Management of Suppliers)

Asprey participates in, co-ordinates and enhances its worldwide efforts to ensure that our precious metals and raw materials come from legitimate and ethical sources and that they have not been associated with crime, conflict, or human rights abuse. It is our policy to only enter business only with legitimate and certified suppliers through all our product categories. We will not deal with and will discontinue engagement with suppliers not abiding to the current legislation we will not tolerate or profit from, contribute or facilitate inhuman activities; forced labour; child labour, human trafficking* and any human rights violations.

(*UN definition: "The recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose including forced labour.

Our Policy is founded upon our general standards of business conduct and Asprey Holdings Ltd has a commitment to:

- Conduct our business in a culture of honesty and with an opposition to corruption and fraud
- Maintain high moral, ethical and social standards in our business and activities
- Maintain proper business relationships with all suppliers

We require our employees, agents, consultants, business partners and suppliers to comply with our policies. We ensure that Management who deal directly with the suppliers are confident with their ethical procedures. We require the suppliers to provide a letter stating that their company adheres to up-to-date environmental criteria and legislation with any required certification before working and to provide evidence of their internal procedures and governance. We review the relationships on an annual basis.

We have developed several policies, such as the Supplier Compliance Letter [..\Asprey_Supplier Compliance Letter - Template.docx](#); Questionnaire and the Manufacturing Code of Conduct [..\Asprey_Manufacturing Code of Conduct.docx](#) that Asprey's suppliers must sign and adhere to.

SUSTAINABILITY CRITERIA

ROYAL WARRANT OF APPOINTMENT

Asprey has a long and established relationship with British royalty dating back to the 1800s when Queen Victoria awarded the first Royal Warrant. Since then, Asprey has held a Royal Warrant for every British monarch and several other foreign heads of state. The Prince of Wales, HRH Prince Charles awarded Asprey a Royal Warrant as Jewellers, Goldsmiths and Silversmiths. Asprey continues to hold this Royal Warrant today.

As part of this prestigious patronage there is a rigorous and thorough standard of responsibilities and expectations that Asprey is required to meet. The Royal Household expects holders of Royal Warrants of Appointment to have a responsible approach to sustainability issues, understanding the environmental and social impacts of their business activities and commit to doing what they can to manage them. This includes the use of renewable natural resources, sourcing of raw materials, supply chain management and traceability, minimising waste, the fair treatment of people and standards of animal welfare.

Asprey adheres to the above expectations outlined by the Royal Warrant Association at a minimum, ensuring that our business practices, supply chain, partnerships are closely monitored and updated in line with current social and environmental legislation.

SUSTAINABILITY OVERVIEW Asprey is committed in the promotion of sustainability across all our product categories, summarised into 5 key points that we are actively work across.

- **Fight against climate change** – Reduction of Plastic Use, reduction in Electric, water. Increased recycling, waste collections, commuting (local and business travel)
- **Development of a circular economy model** – Improvements in manufacturing processes, maximum recovery of waste, prolonging the life cycle of our products; certified material supply chain, low environmental impacts of packaging, store fixtures etc; Revision of the list of banned or restricted substances in our manufacturing processes and inline products in view of the most recent and reliable scientific studies or according to the new applicable legislation
- **Promotion of a responsible supply chain** – Traceability of all materials used; certified suppliers and materials; Promotion of the protection of exotic animals, responsibly sourced stones, of their ecosystems and protected and certified supply chain; optimisation of uses and maximum waste reduction
- **Embracing diversity:** Personnel training and engagement; Promotion of welfare initiatives for employees; Promotion of the role of women in the workplaces; Employee awareness and information activities
- **Support to communities;** Support of initiatives aimed to promote the social and economic development of communities where Asprey operates and sources products; Support to social and charitable projects

PERPETUAL CREATIONS - ASPREY'S SUSTAINABLE OFFERING

Asprey's products are highly sustainable, designed for generational use. The use of exquisite and quality materials produced by hand-picked artisans ensures that the majority of Asprey's products have an intrinsic value. Sold in limited quantities through a purposeful and narrow distribution line, each product is carefully hand produced with optimum care and acute attention to detail.

Products are created by Asprey to have a long-life span, supported by detailed care instructions to ensure the longevity of each creation. Asprey also offers several life prolonging services to ensure products can be resold, upcycled, repaired, retained for multiple use, and eventually passed down from generation to generation.

These include:

- Silver, Jewellery, Watch and Leather Repair workshops
- Consultation, design and production for modernisation, rework or upcycled Asprey jewellery items
- The Handbag Spa to repair, refresh, and clean worn Handbags for a new lease of life
- Personalisation – to create a more personal attachment

Furthermore, Asprey dedicates itself to the preservation of traditional, unique artisanal crafts internationally. Through carefully curated partnerships with handpicked experts in their fields, products are produced in close collaboration with independent artists, specialist craft houses as well as rare and traditional craft techniques all sourced for their unique and exceptional nature. Asprey has fostered relationships with artisans globally bringing them assistance, guidance and a luxury retail platform for retail opportunities, commercial prospects, and distribution networks to small, independent, and charitable businesses. A few examples of some of these partnerships include;

Turquoise Mountain Asprey initiated a Partnership with charity **Turquoise Mountain** in 2017, producing an exclusive range of precious stone boxes, created in Afghanistan. Turquoise Mountain was founded by HRH The Prince of Wales in 2006 to preserve and regenerate historic areas and communities and to revive traditional crafts, creating and protecting jobs and skills. The collaboration provides an exceptional platform for the work of artisans living in sometimes challenging environments and yet are able, with the right support, to produce pieces to the quality expectation of Asprey. Asprey's core values align perfectly with the work of Turquoise Mountain and under the shared patronage of HRH The Prince of Wales, the collaboration joins true advocates of traditional craft and the preservation of the work from highly skilled artisans wherever they reside.

Bidwa Foundation Asprey London and irthi contemporary crafts council developed an exclusive 'one stitch at a time' collection, supporting the bidwa social development program and featuring the traditional handicraft of the United Arab Emirates. The collaboration epitomizes the role of the irthi contemporary crafts council that focuses on empowering women economically and socially across the MENA and central Asia regions through the revival and modernisation of the crafts for present and future generations. The first limited edition collection of handbags was braided by the skilled craftswomen from dibba al hisn within the emirate of Sharjah, United Arab Emirates as part of the bidwa social development program. The bidwa 'one stitch at a time' 2016 collection features the art of 'talli' in bespoke design and striking colourways, which took 23 women nearly 3 months to skilfully braid by hand.

In addition, Asprey promotes craftsmanship within its own network with onsite workshops (Silver, Jewellery, Leather), housing polishers, mounters, polishers, silversmiths, and leather craftspeople who produce around 45% of Asprey's retail stock as well as producing specialist Bespoke Commissions with the motto 'It can be Done'. The craft and techniques used are incredibly rare and we support the Goldsmith's Hall in promoting this rare trade including the employment of special apprenticeships programmes with a view to support Arts and Crafts.

SOCIAL – CORPORATE RESPONSIBILITY

We have implemented as many codes as our principles require. They set out the fundamental values to which our partners must subscribe. These ethical and professional expectations are a means of ensuring legislation and standards are respected; they also play an important role in upholding the credibility and principles of Asprey London.

Code of conduct for Asprey employees:

Our employees are our strength. The competence of our workforce worldwide is what contributes to keep and further enhance the high standard of all Asprey's products and services. We endeavour to create a safe working environment for all our employees and offer the opportunity to progress where possible. We strive to advocate and offer equal opportunity for all.

The Asprey code of conduct informs employees of group rules and procedures with respect to equal opportunity, human rights, workplace health and safety, conflict of interest and confidentiality.

(STAFF HANDBOOK LINK> [..\HR\Staff Handbook - 2014 \(Amended\).pdf](#))

Corporate Code of Ethics:

Asprey's reputation is one of its most important assets. This reputation, developed over the past 240 years, is based on values of integrity, transparency, and an impeccable ethic. We strongly believe that ethics and commercial activity are inseparable. Asprey's mission is to make sales growth by offering our customers high quality products and services through innovation and entrepreneurship and original artisanal craft.

The purpose of this Business Code of Conduct is to provide each employee within the Asprey group a good understanding of the standards governing the conduct of our business and our relationships with third parties. Each of us has the responsibility and the obligation to uphold the spirit of the applicable laws to the letter, as well as the rules outlined in the Staff Handbook and further illustrated in the Manufacturing Code of Conduct.

Due Diligence

A strict code of conduct stating that we do not, under any circumstances, maintain business relations connected to criminal activities or criminal or terrorist enterprises, or which could finance criminal or terrorist activity.

Code of conduct for suppliers:

Guidance regarding working conditions, social and environmental compatibility, transparency, collaboration, and trust-based dialogue

[..\Asprey_Manufacturing Code of Conduct.docx](#)

We require our employees, agents, consultants, and business partners to comply with this policy, and will enforce it with appropriate disciplinary measures, up to and including termination of employment or contracts.

GOVERNANCE

Asprey employs a set of systems, rules, practices, and processes to govern its business, ensuring there is a model to oversee key areas related to the distribution of rights and responsibilities by all participants in the organization.

Governance ensures everyone in an organization follows appropriate and transparent decision-making processes and that the interests of all stakeholders (shareholders, managers, employees, suppliers, customers, among others) are protected.

Asprey's products, supply chain and management are based on framework of authority and accountability that defines and controls the outputs helping to build an environment of trust, transparency, and accountability necessary for fostering long-term investment, financial stability, and business integrity, thereby supporting stronger growth and more inclusive societies.

The key areas covered are:

- **Board Composition** - Transparent Management structure and Board Diversity
- **Shareholder Rights and Engagement**
- **Management /Employment Compensation Policy**
- **Anti-Corruption Policies i.e., Money Laundering**
- **Business Ethics/ Code of Conduct** -working closely with key governance bodies ensuring optimum compliance across the business and our suppliers; CITIES; RJC; Kimberly accord etc
- **Audit Committee Structure** - Objectives and key results (OKR) is a goal-setting framework that helps organizations define goals and objectives that promotes transparency, team building, self and peer evaluation whilst enhancing management performance and the formation of strategy across the business. Adopted internationally through the C Suite executives, Director and Management level. Established in 2018.

ASPREY'S ESG GOALS AND COMMITMENTS FOR 2021/22

This is year we have accelerated our work in identifying short, medium, and long-term milestones across the below key pillars:

Focus (Transparency and Governance): Critical to holding us accountable for our actions, measurement, and evaluation

History (Quality and Preservation): the core of sustainable luxury articulated through the production of perpetual products, crafted in a responsible way

Craftsmanship (Collaboration and Partnerships): Fostering key partnerships throughout the supply chain (from independent artisans to leather tanneries and factories) to ensure compliance and best practice across the business

Rarity and Innovation: To leverage new technology, products, and services to bring about further progress in every area of our business from design through to production and distribution

SHORT TERM:

- **Asprey on Bruton Street** Asprey's flagship Building moved to Mayfair's Bruton Street October 2021. The environmental and sustainability benefits of the move are listed below:
 - Better Building efficiency (water, electricity usage with modern appliances, metres plumbing and lighting etc),
 - Sourced British Suppliers and Contractors to work on refit to reduce carbon emissions of transporting materials/workers
 - Limited plastics or non-recyclable materials used
 - LED lighting to replace all current light fixtures
 - Space for new initiative, Asprey Digital Studio
- **Company wide Clear up** – Move of Corporate Office, Workshops and Flagship store (as above). Review of storage, transportation, recycling
- **Further assignment of ESG responsibility** within the management team will be rolled out, reflecting the importance of ESG integration across the organisation

MEDIUM TERM GOALS

- Packaging Rework – Redesign of existing packaging, working towards a 100% recyclable option
- Elimination of One Time Use Plastics across the business/ supply Chain (Packaging, Fragrance and Amenities)
- Formal Measurement of Carbon Emissions – Worldwide (22/23)
- Implementation of additional Governing Bodies for reporting, auditing of Raw Materials and suppliers; i.e The Leather Working Group

LONG TERM GOALS

- Analysis and measurements of the wider business operations and their local impacts and energy use – Deep dive into All Locations
- Circular Sustainability
- Blockchain and NFT's
- Looking beyond our business, Luxury as an industry Objective to transform the luxury industry