

SIGNET
JEWELERS

Code of Conduct

*Living our Purpose of Inspiring Love
with integrity, every day*



KAY ZALES JARED Banter DIAMONDS DIRECT Blue Nile JAMES ALLEN[®] PEOPLES H·SAMUEL ERNEST JONES

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Click REPORT on any page to go to the reporting resources in section 4 to communicate an issue or ask a question.

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Letter from our CEO



J.K. Symancyk
Chief Executive Officer

Dear Signet Team,

As we look at our early achievements with our Grow Brand Love strategy, one thing is clear—you are the reason for our progress and success. The dedication and accountability you show every day to our purpose of Inspiring Love is what makes this company special.

Our customers turn to us to celebrate life’s most meaningful moments, inviting us to be part of their stories. That trust isn’t built only on what we sell, but on how we show up—with integrity, care, and excellence in everything we do.

Our Code of Conduct is the foundation of the trust we’ve earned. It embodies our Signet mindset of being Etched in Ethics and reminds us that integrity guides everything we do. It’s also what helped us be named one of the 2026 World’s Most Ethical Companies® by Ethisphere for the second year in a row.

When we choose to act ethically, we create something lasting—strong relationships with our customers, trusted partnerships, and a workplace where we all thrive. Every decision we make, no matter how small, is a chance to live our values and strengthen our reputation.

Thank you in advance for investing the time to review our Code of Conduct. Together, we will continue to be our customers’ most trusted advisor, a company we are proud to work for, and one of the world’s most ethical organizations.

If you ever have questions or concerns, please reach out—to your manager, your HR Business Partner, or our Ethics & Compliance team or contact the T.I.P.S. Line at www.Signet.EthicsPoint.com. We’re here to support you.

Thank you,

J.K. Symancyk
Chief Executive Officer

Principles for the Code of Conduct

Signet Jewelers (“Signet”) is dedicated to fostering a transparent, inclusive, and collaborative workplace where open, honest communication is expected at all levels. We believe our diverse workforce is key to our success and is our most valuable asset.

This Code of Conduct (“Code”) defines the principles that guide how we work and interact, setting the highest standard of ethical behavior for everyone at Signet—from our Board of Directors (“Board”) and Leadership Team to every team member and third party we engage. Acting with honesty, integrity, and respect is not optional; it is the foundation of our culture and the trust we build with our customers, colleagues, and communities. Even a single ethical lapse—whether real or perceived—can undermine that trust and damage our reputation.

Our Ethics & Compliance Department (“E&C”) is responsible for managing and updating this Code, which is reviewed and approved by the Board annually.

If you have questions or concerns about potential violations of this Code or any corporate policy, please use the reporting resources outlined in Section 4. You can access them immediately by clicking the link at the top of every page. Signet is committed to protecting those who raise concerns in good faith—speaking up is an act of integrity, and we value it.

All Signet team members must acknowledge this Code during onboarding and complete annual Code of Conduct training. By doing so, we affirm our shared responsibility to uphold ethical standards and safeguard the trust placed in us.

Note: If any Company policy conflicts with this Code, the Code takes precedence unless a policy explicitly states otherwise. All referenced policies are available on the SIGnet.



“

Customers choose to do business with companies they trust. When we act with integrity, we not only protect our reputation—we earn lasting loyalty, growing brand love aligned with our Core Values.”

Stash Ptak
Chief Legal, Compliance and Risk Officer



Why do we have a Code?

At Signet, our Purpose - **Inspiring Love** – requires we go beyond simply following the law. It means acting with honesty, integrity, and accountability at every level of our organization.

We require the same from everyone who represents Signet or provides us with products or services.

Our Code exists to:

- Clearly communicate expected behavior for all team members.
- Serve as a clear, accessible resource where team members can understand our ethical standards, find answers to common questions, and learn how to report concerns safely and responsibly.
- Help us proactively address behaviors that go against our Mission and Purpose and/or create legal and compliance risks.



Our Core Values

People First

APPRECIATION | INCLUSION | JOY

Our people come first. We support and appreciate each other, embrace differences, celebrate uniqueness, encourage development, and reward performance. We have fun together and feel the joy of delivering our mission every day.

Own It

ACCOUNTABLE | INTEGRITY | CONTINUOUS IMPROVEMENT

We deliver on commitments because we are personally accountable. We learn from mistakes and strive for continuous improvement. We are trustworthy, always operating with the highest integrity.

Customers!

EXCEED EXPECTATIONS | EARN TRUST | BUILD RELATIONSHIPS

We provide truly memorable experiences, striving to always exceed expectations. We delight in gaining customer trust, developing lasting relationships, and providing the best products, service, quality, and value.

Lead Bravely

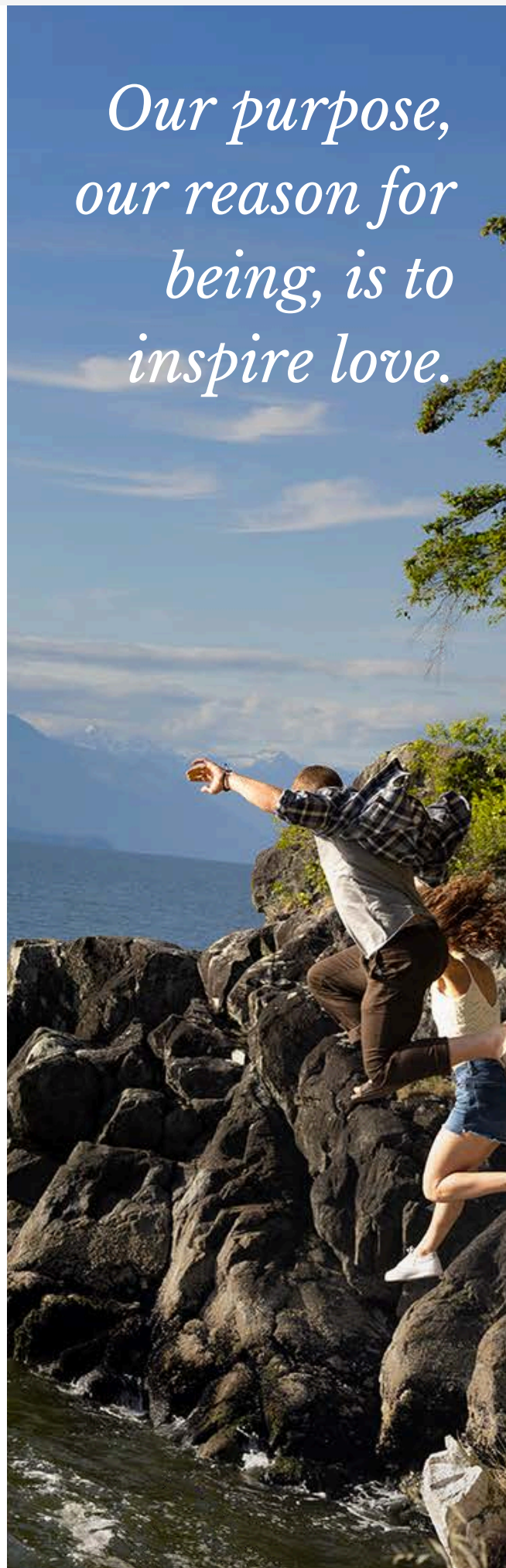
TEAM | INNOVATIVE | AGILE

We transform our future with courage and vision by working as a team. We are curious, challenge the status quo, and innovate. We are agile and fearless, committed to win by focusing on priorities that make a difference.

Straight Talk

HONEST | RESPECTFUL | COLLABORATIVE

We listen, seek the truth together, and tell it like it is, even when it's difficult. We are honest and respectful. We communicate openly and clearly, strive to simplify, and drive collaboration.



*Our purpose,
our reason for
being, is to
inspire love.*



Team Member Expectations

Our **core values** guide how we work together.

We support and respect one another, embrace our differences, and ensure every voice is heard. We believe open, honest and respectful communication leads to success at every level.

To help uphold these values, all team members are expected to:

- Adhere to the standards and expectations in this Code and its supporting policies.
- Timely complete all required training to understand the policies and laws that apply to their role.
- Ask questions when unsure about the Code or supporting policies.
- Report concerns or potential violations of the Code, Company policies, or laws using the resources listed in section 4. You can report anonymously.
- Act early - seek help as soon as an issue arises.
- Be honest and cooperative when raising concerns or participating in investigations.

Maintaining a Positive Employee Experience

“

Trust and ethics are the foundation of true success. When we lead with them, we build strong teams and lasting results.”

Claudia Cividino
President Jared



People Leader Expectations

Leadership happens at all levels, but people leaders have a greater responsibility to model and uphold the standards in our Code.

In addition to the expectations of all team members, people leaders must:

- **Lead by example** by treating team members fairly and modeling ethical, respectful behavior.
- **Support training efforts** by completing assigned training promptly and ensuring your team does the same
- **Be a knowledgeable resource** for your teams, making sure they understand and follow the Code and related policies

- Use the [Toolkit](#) on the How We Work page of SIGnet to help you if you encounter situations you find difficult to handle.
- Regularly discuss ethics, integrity and compliance topics to demonstrate honesty, respect, and transparency are valued in the workplace.
- Listen openly and encourage team members to speak up about concerns or questions.
- Promptly escalate any concerns through the proper reporting channels listed in section 4.
- Never retaliate – and never tolerate retaliation - against anyone who raises an issue or concern in good faith.

Lead Bravely, with Integrity

As a people leader, I sometimes find it challenging to dedicate time to promoting our Code.

What can I do?

You can consistently model ethical behaviors in your day-to-day work and integrate discussions about ethics into your usual team meetings. Have an open-door policy and ensure team members are comfortable raising concerns. Use the dedicated resources created to assist you such as the Everyday Ethics for Leaders discussion guide found [here](#) in the Ethics Toolkit on the SIGnet.

Critical Thinking



Making Ethical Choices

Ethics means doing the right thing based on our values. At work, you may face ethical dilemmas—situations where two important values conflict, such as keeping a confidence versus reporting wrongdoing. To help make the best choice, ask yourself:

Is it Legal?

Is it consistent with our policies, values and Code?

Does it build trust with our stakeholders, all team members, customers, and our communities?

Would you be proud of your conduct if it became publicly known?

Does it benefit the company - not just a certain group or person?

If you answer “no” to ANY question, do not continue with that decision. If you’re not sure about it, ask for help from any of the resources listed in section 4.

If you answer “yes” to ALL the questions, you are on the right track and can move forward. If you’re ever unsure about the next steps, seek guidance.



Curating an Inclusive Environment

Signet is committed to building a diverse and inclusive workplace at all levels. We value diversity in terms of backgrounds and personal attributes.

Diversity and inclusion help us understand different cultures, learn from unique perspectives, and grow our business with agility. This commitment applies to every stage of employment - recruiting, hiring, compensation, benefits, training, promotions and beyond.

“

“At Signet, we move beyond diversity metrics to true inclusion—where everyone belongs, feels empowered to contribute, and knows their voice matters. Inclusion is how we turn respect into action—when every voice is valued, we unlock the full potential of our team and our purpose.”

Reggie Johnson
Chief Talent and Inclusion Officer

Q&A

My co-worker “teases” me for the way I speak and says that I don’t sound very “American.” I have asked her to stop, but she always tells me, “it’s just a joke.” I don’t want to make problems for the team but am tired of feeling disrespected. What can I do?

You did the right thing by asking her to stop. Now it’s time to enlist the help of your manager or the reporting resources listed in section 4 of the Code. Your concern will be taken seriously and investigated.



Respect, Fairness, and a Safe Workplace

We treat all team members, potential team members, customers, and third-party partners with fairness and respect. **Signet does not tolerate discrimination** – it’s not only illegal, but it also goes against our core values and Mission to help all people Celebrate Life and Express Love.

All team members are expected to help create a positive environment. This means no harassment, bullying, or behavior that creates an unprofessional, offensive or hostile workplace - whether toward customers, other team members, or vendors.

Our commitment to inclusion also means maintaining a welcoming, safe and healthy workplace. Signet strictly prohibits the use, possession or sharing of pornographic, racist, sexist or otherwise offensive content on our property, our networks, and in our stores. Please remember, communications on Signet systems are not private and may be monitored.

Did you know?

Discrimination is any unfair or unequal treatment based on a **legally protected characteristic**.

Harassment is a form of discrimination. It is any unwelcome conduct based on a legally protected characteristic.

Legally Protected Characteristics
Age
Race
Religion
Gender/Gender Identity
Marital Status
Pregnancy
Veteran/Uniform Status
National Origin/Ancestry
Citizenship
Sexual Orientation
Disability

Critical Thinking

You see a co-worker sharing a video on her phone with her co-workers. The situation appears very tense and uncomfortable. You interrupt by asking for help with something else.

Later, one teammate thanks you and says this behavior happens often, even after repeated requests to stop. She asks that you keep it secret because she knows the other teammate is “well-connected” at the company. Should you keep her secret?

No; be open and transparent, explaining our Code requires we report any potential violation. There may be other team members this is impacting, so contact one of the reporting resources for further investigation.



Health and Safety

Creating a safe and secure work environment is essential to show respect for each other and our customers. Signet is committed to:

- Maintaining a drug and alcohol-free workplace. The possession, use, or distribution of illegal or unauthorized drugs or alcohol is strictly prohibited.
- Prohibiting smoking or vaping on Company property except in designated areas.

To help prevent injuries and accidents, team members are to keep work areas free of hazards. If you see unsafe conditions, equipment issues, or experience an accident or injury, report it immediately to a supervisor, HR or Legal’s Risk and Safety department. Except for authorized security personnel, Signet enforces a weapons-free workplace for the safety of all team members.

Speak Up – We’re Here to Help

No matter your role at Signet, you’re expected to report any activity or behavior that goes against our Code or Company policies – whether you witness or are made aware of it.

You’re not alone. If something doesn’t feel right, you can talk to:

- Your manager
- Any other people leader
- Your regional loss prevention manager
- HR
- A member of the Legal Department
- E&C

These teams and leaders are here to listen, guide, and support you—whether you’re ready to report an issue or just want to talk through it first. You’ll find more details in section 4 of this Code.

Team members may also communicate in good faith with any government agency to report a possible violation of the law or to participate in any federal, state, or local government agency’s or commission’s investigation.

Note: Once Signet receives notice of a reported concern, there are designated departments and personnel responsible for handling the Company’s response to these agencies.



No Retaliation – Ever

Signet strictly prohibits any form of retaliation against team members who raise a good faith concern – meaning they honestly believe something may be wrong, even if it turns out not to be a violation. Everyone who speaks up deserves to be treated with respect and appreciation for doing the right thing.

Accountability for Violating the Code

Violating the Code can harm Signet’s brands, culture, and reputation. That’s why we take it seriously. Team members at any level may face disciplinary action, up to and including termination, if they:

- Violate the Code or Company policies
- Fail to report a known violation
- Knowingly make a false report
- Approve or allow misconduct by others

In some cases, violations may also result in civil or criminal penalties for the individual or Signet.

Critical Thinking

You saw troubling behavior at work and worry reporting it could hurt your career. You aren’t certain it’s a violation.

Should you report it?

You must report suspected Code violations so the right team can investigate and take any necessary corrective action. **Retaliation** – like demoting or denying promotions to team members for reporting in good faith - **is strictly prohibited** and should be reported.

Helpful Resources

[Workplace Environment & Safety Policy](#)

[Open Door and Take It Personally, Signet \(T.I.P.S.\) Policy](#)

[Equal Employment Opportunity Policy](#)

[Non-Retaliation Policy](#)





Sales and Marketing Practices – It’s About Earning Trust

Putting customers first is one of our core values. We aim to create memorable experiences and always strive to exceed expectations. Building trust and loyalty starts with being honest and ethical in everything we do.

“

I love this company and the purpose behind it. When you believe in that purpose while living the values, you show up with integrity, passion, and a real commitment to doing what’s right.”

Karen Cho
Chief People Officer

When selling, advertising, or promoting our products and services, we must:

- Present information clearly, honestly, and completely
- Avoid exaggerations or misleading claims
- Speak respectfully about our brands, partners, and competitors – never make negative or false remarks
- Never use confidential information from competitors or misrepresent facts to gain an advantage

Doing the right thing isn’t just good business, it’s how we earn customer trust and loyalty for the long term.

Competition and Antitrust

Signet supports fair and open competition and follows all antitrust laws. These laws ban agreements between businesses that seek to limit competition and divide up markets. Violating them can lead to serious legal consequences for both Signet and the individuals involved.

- Some examples of anti-competitive behavior include:
- Agreeing with competitors on pricing discounts or promotions
 - Agreeing on how much to produce
 - Dividing up markets or customers
 - Refusing to work with a vendor to hurt competition

To uphold our ethical standards and stay compliant, never discuss private business information—such as pricing, profits, production details, products and services, bids, or customer information—with competitors, even casually or at informal events. Sharing such information can lead to anti-competitive behavior, legal risks, and reputational harm.

Did you know?

A BRIBE is anything of value given to improperly influence someone’s actions or create the appearance of doing so.

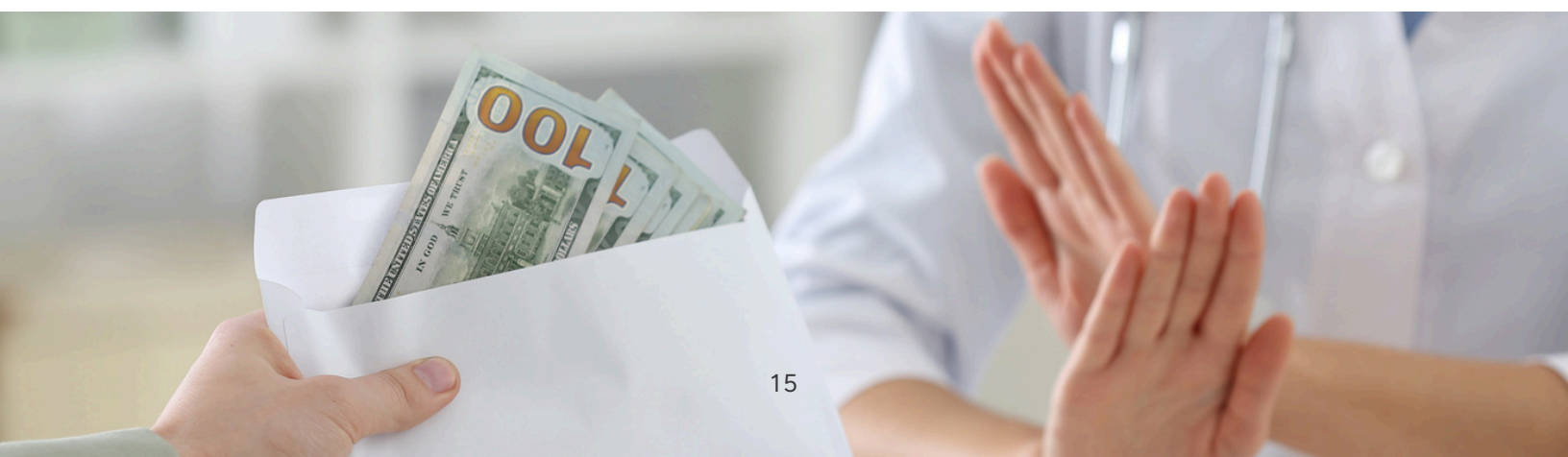
A KICKBACK is money or benefits returned to someone as a reward for giving or promoting business.

Anti-Corruption and Anti-Bribery

- Signet is committed to achieving success with honesty and integrity. Team members must never:
- Offer, give, request, or accept bribes, illegal payments, kickbacks, or gifts intended to influence business decisions
 - Use third parties to make improper payments on our behalf
 - Enter into arrangements that may illegally influence a business relationship or decision

We follow anti-bribery laws and regulations - no matter the country or local customs.

Helpful Resources
Global Antitrust Compliance Policy
Anti-Bribery and Anti-Corruption Policy

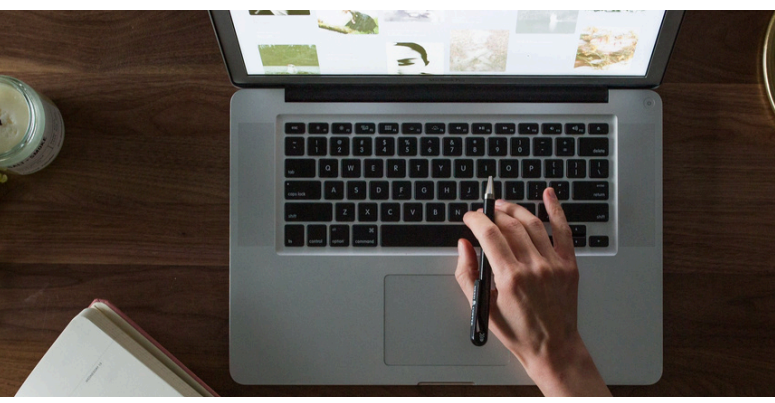


Gifts and Entertainment

Giving or receiving gifts or entertainment can create problems if it is meant to sway a business decision or give anyone an unfair advantage. This includes, but is not limited to:

- Cash or cash-equivalents
- Non-business entertainment (e.g., concert or sporting events where Signet team member or the vendor is not present)
- Personal favors or services
- Political or charitable donations made to gain favor
- Job offers or other intangible perks

Only give or accept a gift if it meets the limits and rules in Signet's Gifts and Hospitality Policy. If you know – or even suspect - a gift is excessive or intended to influence, politely decline or return it and explain that Signet's Code does not allow you to accept it.



Critical Thinking

Which of the gifts or hospitality below could you accept from your vendor?

- A) Box seats to an upcoming sporting event**
- B) Dinner at a local restaurant for the whole team**

Potentially both of them! Important considerations include: the value of the event or hospitality; if the vendor is attending the event with you and your team; and if it is intended - or could be perceived - to influence a business decision. Your manager and other Signet support personnel are here to help you make the right decision! Submit the proper Code of Conduct Disclosure form through Workday for decisioning from the E&C Department.

Conflicts of Interest

Sometimes it's not obvious when a situation creates a conflict of interest. A conflict can happen when your personal interests – or those of a family member or close friend – affect your ability to make decisions in Signet's best interest. Having a conflict of interest isn't necessarily wrong but **not disclosing it is**. If you think there might be a conflict, talk to your manager or E&C right away, so it can be reviewed and handled properly.

Note: Conflicts involving executive officers or directors must be approved by the Board or a Committee of the Board and disclosed as required.

Critical Thinking

A merchandise buyer suggested using a vendor that is owned by their in-laws. They are very proud of the business and bring it up often. Is this OK?

It is a conflict of interest to use influence with the vendor selection process to award business to a family member's company. The buyer should use the Disclosure Process to inform pertinent team members of the relationship and remove themselves from the decision-making process.

If you have issues or questions about the Code of Conduct Disclosure Process, please email E&C at ethics@signetjewelers.com.

Conflicts of Interest (continued)

Examples of conflicts of interest include but are not limited to:

- Owning or running a jewelry or other business that sells like products or provides similar services as Signet
- Doing outside work during Signet work hours
- Improper use of Signet’s physical resources for personal purposes
- Having family or friends in a direct reporting relationship
- Family or partners working for vendors used by Signet without properly disclosing the relationship or interest
- You, or someone close to you, have a financial interest in a Signet vendor or supplier without properly disclosing it

Disclosing these relationships helps prevent conflicts, bias, or favoritism, real or perceived.

If you’re not sure whether something is a conflict of interest, you can use the [Disclosure Process and Form](#) to submit your question or concern as outlined in section 4.

Once you submit a disclosure, **wait for guidance**. Do not take further action until you hear from E&C.

Serving on a Board is generally permitted with the following limitations:

- The organization is not a competitor
- There is no conflict with Signet’s goals
- The Board has no influence over Signet business decisions.

For paid or for-profit boards, you must get prior approval from management.

Did you know?

Conflicts of interest happen when your ability to make objective business decisions for Signet is - or seems to be – compromised.



Social Media Use

At Signet, we understand that social media is a big part of everyday life. It helps us connect with our customers, spot trends and promote our brands. Because information spreads quickly online, we must **think before we post.**

Signet expects all team members to use social media responsibly, including but not limited to the following guidelines:

- Share positive, professional content that supports Signet’s Purpose – like work milestones or career achievements.
- Be respectful - never post anything that is rude, offensive, or harmful about competitors, vendors, customers, or the public
- Be transparent - in every post speaking about Signet, its brands, or its products, post content honestly, that clearly discloses you are a Signet employee and includes your employee hashtag disclosure
- Be you! - Do not create social media accounts using Signet or its brands’ names

Did you know?

Posting Google or other online reviews for your store or company location is prohibited. It could artificially inflate our ratings and damage our customers’ trust in us.

NOTE: Any content shared on social media, in a business or personal capacity, that is contrary to our values, or our Code, may be subject to disciplinary action, up to and including termination.

Helpful Resources
Gifts and Hospitality Policy.
Conflicts of Interest Policy.
Social Media and Intranet Usage, Commentary and Expression Policy.

Critical Thinking

Which ONE of the following scenarios is acceptable to post?

A) You post a photo of a celebrity wearing a piece of jewelry that your store carries.

B) You post a poll asking customers to vote on their favorite color of gold - white, yellow or rose.

C) You create a social media page for your store so customers can stay connected.

If you selected scenario B, you are correct! You are encouraged to use the platform creatively, whether to share excitement or to gather information to better meet your customers’ preferences. **Never** create social media accounts using Signet’s or its brands’ names, and do not post photos or names of celebrities or our customers without their consent.

Safeguarding Confidential Information

As part of your role at Signet, you may have access to confidential information about the Company, fellow team members, and our customers or vendors. This information must always be protected and handled with care.

Key expectations:

- Only use or share confidential information if it's necessary for your job.
- Never share it with parties outside of Signet that do not have a legitimate business need to know - including with vendors, family, or friends.
- If you're unsure whether something is confidential, or you need to share confidential information, ask your manager or Legal as referenced in the Reporting Resources in section 4.

Once information is publicly released or approved by the Legal Department, it's okay to share. Until then, keep it secure.

Critical Thinking

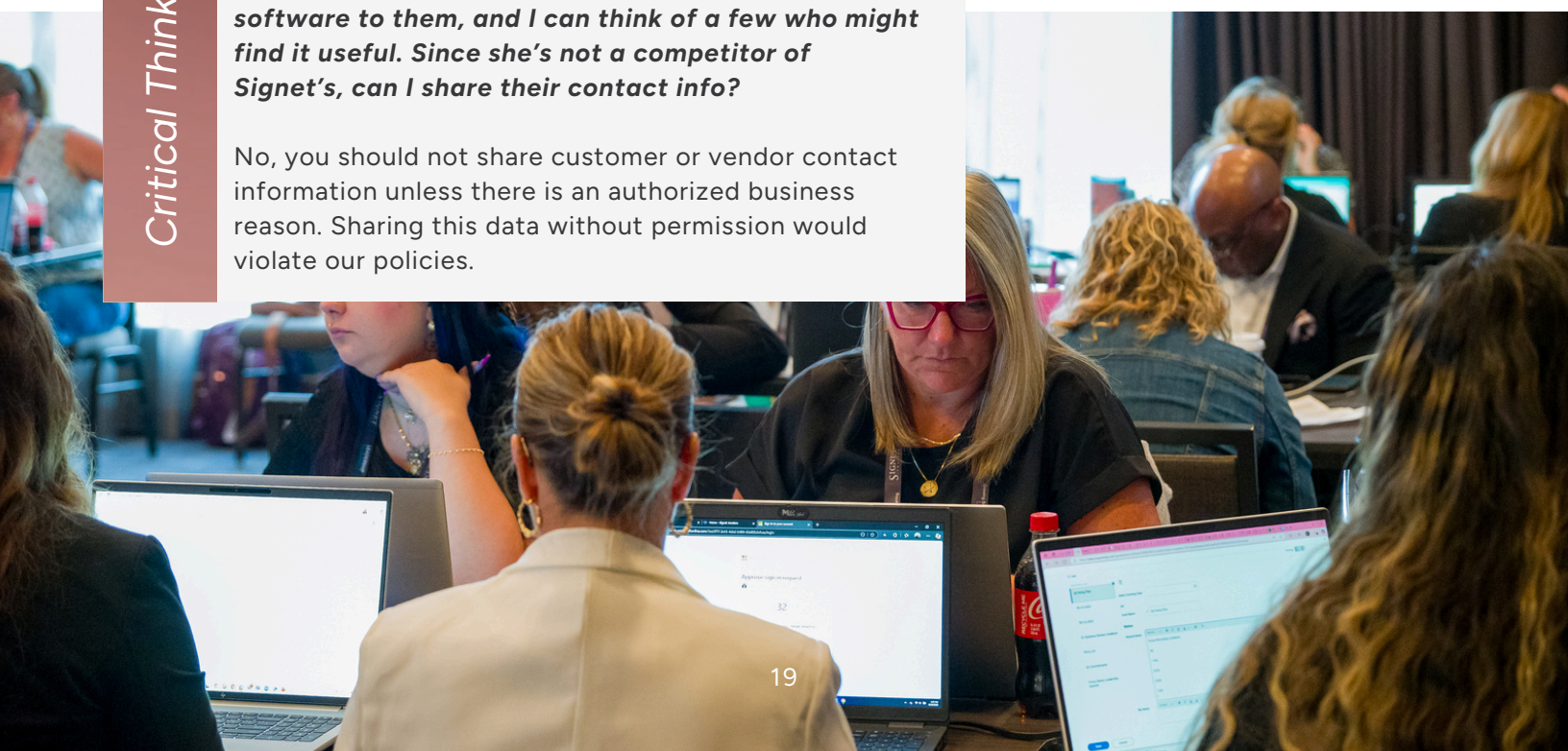
As part of a customer satisfaction survey, your department collected a large amount of customer personal information, including email addresses. Someone from Marketing contacts you and requests the customer data for a targeted marketing campaign. Should you share it?

Although there is a legitimate business reason for the request, the customers who participated in the survey may not have opted-in to use their information for marketing purposes. Consult with Legal before sharing.

Critical Thinking

My sister-in-law started a software company and asked me for contact information for some of our key customers and vendors. She wants to market her software to them, and I can think of a few who might find it useful. Since she's not a competitor of Signet's, can I share their contact info?

No, you should not share customer or vendor contact information unless there is an authorized business reason. Sharing this data without permission would violate our policies.



Responsible Use of Artificial Intelligence

At Signet, we support the responsible and ethical use of artificial intelligence (AI). AI can boost efficiency and innovation, but it must be used carefully and in line with our policy, which applies to all team members and third parties using AI for Signet.

Key points to remember:

- Always review AI generated content and be accountable for the final work product.
- Be transparent with your manager and the intended audience when using AI.
- Use only Signet-approved and licensed AI tools for approved purposes.



Our AI policy is designed to make sure AI is used ethically, securely, and in compliance with other company policies.

Insider Trading

While working at Signet, you may come across information that could affect a person’s decision to buy or sell Signet stock. This is called **material, non-public information**. Using this type of information to buy or sell stock - or sharing it with others so they can – is called insider trading, and it is against the law. Violations can lead to serious penalties, including fines and jail time. It doesn’t matter how you obtained the information or whether it influenced your decision - if it’s not public, don’t use it. Ask Legal if you’re unsure.

Critical Thinking

My friend who works in another department found out about a new product we’re launching and wants to tell their family so they can buy stock before the news spreads. What should I tell them?

Let them know that sharing confidential company information outside of work is not allowed. It could be considered “tipping,” which is illegal and a violation of insider trading laws—even if no one ends up buying or selling stock.

Did you know?

Examples of material information include:

- Unpublished financial results
- Daily sales and volume reports
- Merger and acquisition plans
- Significant changes in management



Helpful Resources

- [Information Security Policy](#)
- [Acceptable Use of Artificial Intelligence](#)
- [Insider Trading Policy](#)

Anti-Money Laundering

As a global business, Signet must help protect the financial system from crimes, including financing terrorism, money laundering, and fraud - especially as a retailer of high value goods.

Team members should stay alert and report any suspicious activity, such as:

- Use of multiple money orders
- Large cash purchases or bulk gift card transactions
- Purchasing large volumes of the same product
- Customers or vendors giving incomplete, false or suspicious information
- Attempts to avoid reporting limits (e.g., breaking up payments)
- Suppliers asking for payments to be sent to unverified accounts

There may be legitimate explanations for most of these actions, so **never accuse** anyone directly. If something feels off, **report it immediately** – it’s the first step to protecting our company.

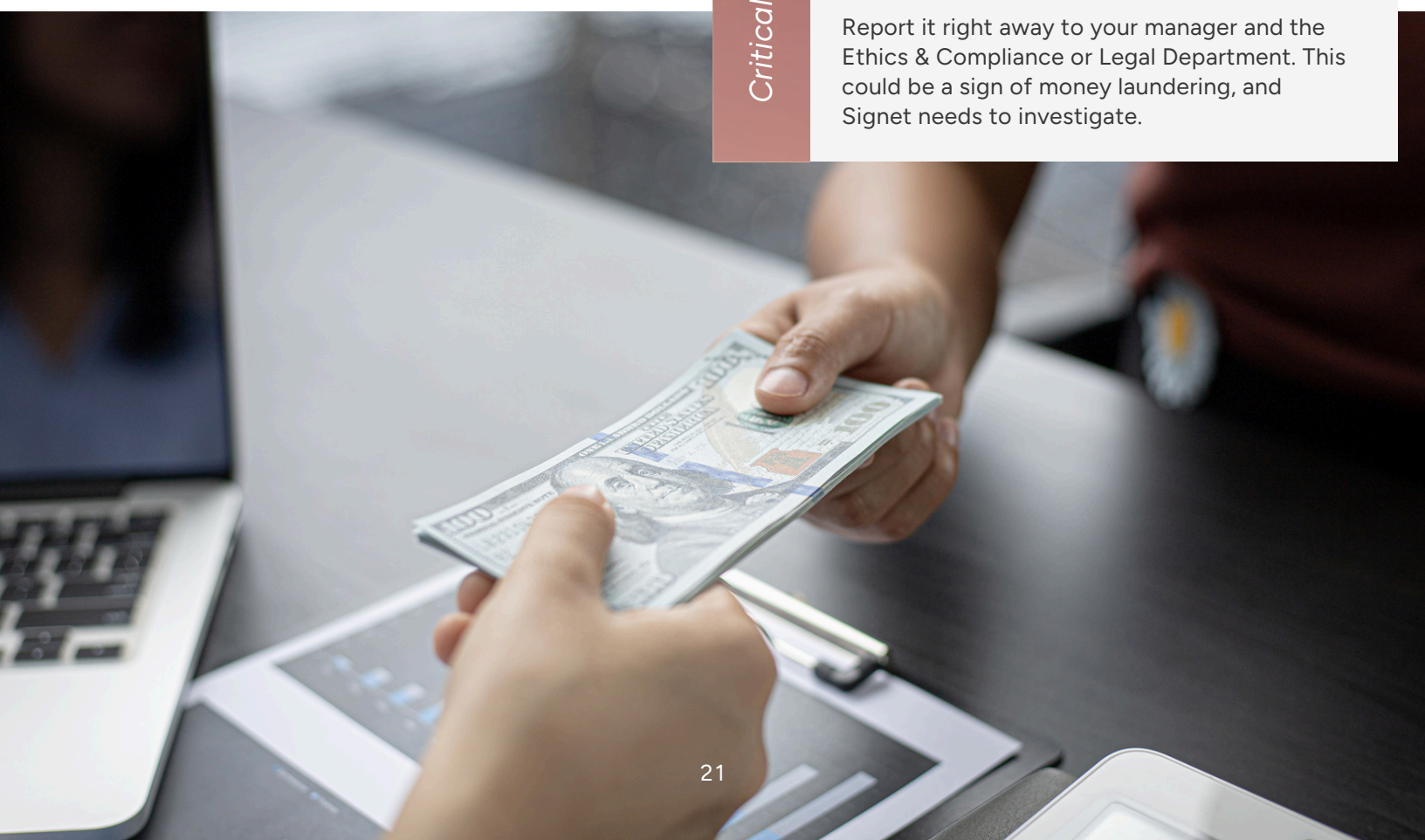
Did you know?

Money laundering is making money earned illegally appear legitimate; so it can be used without revealing its illegal source.

Critical Thinking

A customer starts buying expensive jewelry with cash, each time slightly under \$10,000. It is unusual for him to spend this much, and he has never paid in cash before. What should I do?

Report it right away to your manager and the Ethics & Compliance or Legal Department. This could be a sign of money laundering, and Signet needs to investigate.



Human Rights

Signet is firmly committed to business practices that enforce respect for human rights. Meeting the responsibility to respect human rights is a baseline expectation for every Signet team member and for all partners, suppliers, contractors, and others directly linked to our operations, products, or services.

Signet expects all suppliers to respect internationally recognized human rights. We hold ourselves and our business partners to the highest standards through vendor agreements, our Signet Responsible Sourcing Protocol, and layers of due diligence.

- [Helpful Resources](#)
- [Anti-Money Laundering and Counter Financing of Terrorism Policy](#)
- [Human Rights Policy](#)
- [Supplier Code of Conduct](#)

Signet maintains a rigorous responsible sourcing program to ensure third-party partners comply with these standards and expectations. Consistent with our high standards for social responsibility, we prohibit the use of modern slavery, human trafficking, and forced adult or child labor of any kind.



As a Purpose-driven company, we are dedicated to Inspiring Love. This is at the heart of why we became founding members of the World Diamond Council and the Responsible Jewellery Council, non-profit organizations that protect human rights and maintain the highest standards in the jewelry industry. Engagement with these organizations enables us to create a positive and lasting legacy."

Colleen Rooney
Chief Communications & ESG Officer



Love for our Planet
and Products



SECTION THREE



Product Excellence

Our commitment to product integrity isn't just a business practice—it's a responsibility we all share. Every decision we make and every action we take reflects our dedication to quality and trust.

Signet builds trust with customers and maintains their loyalty by providing them with quality products and services and honoring our guarantees and warranties. It is critical to our continued success that team members who source, select, sell and service our merchandise follow all established policies and procedures. We are committed to offering products that are sourced responsibly and conflict-free.



Responsible Sourcing

The Signet Promise, our rigorously enforced four-layer approach to supplier compliance, is applied across all Signet brands. It holds our merchandising and sourcing teams, as well as our global suppliers, to high ethical standards, enabling us to provide high-quality gemstones and precious metals while supporting the people and communities where we operate.



“Our Code guides us toward our goals, protects our culture of integrity, and helps make sure we operate ethically. Our culture and teamwork are the driving force behind our success.”

Joan Hilson
Chief Operating and Financial Officer



International Trade Controls & Boycotts

Trading in precious gems and metals comes with risks - but Signet actively works to reduce those risks. We are a founding and certified member of the Responsible Jewellery Council (“RJC”), the global standard for responsible practices in our industry. We also encourage our suppliers to become RJC members and undergo third-party audits.

Signet follows all U.S. trade laws and does not support or participate in boycotts unless approved by the U.S. government. We also do not do business with any person or organization under U.S. sanctions.

Third Party Compliance

Signet is committed to doing the right thing, even when no one is watching. This protects our reputation and builds lasting trust with our customers. We expect our third-party partners to do the same. All third party partners are vetted by our business teams to make sure they are safe and reliable.

Anyone providing goods or services to Signet or our customers must follow all applicable laws and regulations and meet the standards outlined in our [Supplier Code of Conduct](#) or vendor buying agreement as applicable.

Protecting Company Assets

Sustainability and growth depend on both innovation and protecting what we already have. All team members must protect Signet’s assets, whether financial, physical, or intellectual, and use them only for approved business purposes.

You can protect our financial and physical assets by:

- Following all policies and procedures that help prevent their abuse, loss, or theft.
- Using Signet funds honestly, responsibly, and only for legitimate business purposes.

Any ideas or work created as part of your job belong to Signet. Team members must not remove, share, damage, or destroy any Company property without permission or unless allowed by our policies. This includes filming or image capture through any medium on Company property.

Did you know?

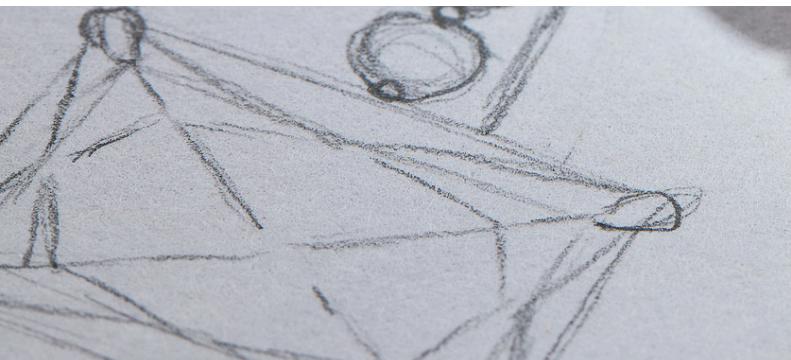
Intangible (non-physical) property must be kept just as secure as physical assets.

Examples of Assets	
Non-physical (Intangible)	Physical (Tangible)
Our Brand Logos	Our Corporate Offices
Copyrights, Patents, and Trademarks	Equipment and Computers
Trade Secrets	Supplies and Products
Design Rights and Inventions	Funds and Merchandise
Processes, Systems and Software	
Customer Lists	

Critical Thinking

My friend works in a Design & Service Center and created some pretty unique sketches for custom rings that were never used. He wants to start his own custom jewelry business and wondered if he could take his designs with him since our customer didn't use them. Is that OK?

No. Signet values our team members' contributions and creativity, but designs created while employed with Signet are our intangible assets and are considered Company property. Safeguarding our assets continues after your employment with us ends.



Accurate Records

Every team member contributes to creating business records, such as hours worked, inventory, sales, and expenses. These records must always be accurate and complete; they help us plan, report to investors, and meet legal requirements.

Falsifying records of any kind – like timecards, contracts, invoices, purchase orders, or expenses - is illegal and strictly prohibited. Team members must never alter or hide any information to cover up improper actions. Working “off the clock” is never allowed.

Critical Thinking

My customer returned an expensive engagement ring in August. I plan to store it in the safe until Black Friday, so it won't impact my sales as much. Is this OK?

No; returns must be processed and inventory tracked timely.

Critical Thinking

My manager frequently requests that I complete small tasks or short trainings before clocking in, so we stay within our payroll budget. Should I clock in first, since it usually takes less than 30 minutes?

Yes. Regardless of the type, duration or volume of work being done, team members should always clock in before starting work-related tasks. It violates wage and hour laws and is against Signet Policy to not properly clock in and out.

Record Retention

We have both ethical and legal responsibilities to keep records accurate, timely, and properly stored. Good recordkeeping helps us meet business needs and makes sure information is available when required.

While records may be retained longer than specified, it is important to consider if there is a legitimate business reason for retaining them. Once records are determined to be no longer required, they should be disposed of as referenced in the [Information Security Policies](#).





Fraud Prevention

Preventing and detecting fraud is critical to protecting our brand and reducing financial and reputational risks. Examples of fraud include:

- Signing someone else’s name on a document without permission
- Mislabeled a business expense
- Falsifying records, like inflating performance data or back dating contracts
- Changing payroll information without approval

If you are unsure how to record something, especially financial data, ask your manager. If you suspect fraud or improper reporting, use the reporting resources in section 4 to raise your concern.

Political Contributions and Involvement

We encourage and support team members to vote and participate in politics. However, Company resources or funds **cannot** be used for political purposes. Only authorized individuals may speak on behalf of Signet.

When making personal political donations, never suggest you represent Signet. Also, do not pressure coworkers to donate or get involved or campaign at work.

Helpful Resources
<u>Information Security Policy</u>
<u>Third Party Risk Management Policy</u>
<u>Corporate Citizenship & Sustainability Report</u>
<u>Signet Responsible Sourcing Protocol</u>

Audits and Investigations

Transparency is key to our ethical culture. All team members must fully cooperate with investigations or audits, whether internal or external. Never destroy or alter records related to an investigation. If you have concerns, speak with your manager, HR, Legal or E&C.

Reporting Resources

Important items to note:

- You can report a concern or ask a question anonymously. If you do, include as much detail as possible so it can be properly investigated.
- Signet takes all reports seriously and will handle them promptly and professionally. It will be kept as confidential as possible without hampering the investigation or the law.
- We respect your privacy and protect against retaliation—see the Non Retaliation Policy for more details.
- While we may not be able to share full investigation results, we will keep you updated on the general progress.

Reporting Resources and Contact Information

For Electronic Reporting:

(Locations other than North America or UK can use any email address)

- E&C: ethics@signetjewelers.com
- T.I.P.S.*: www.signet.ethicspoint.com
- North America HR: EmployeeRelations@signetjewelers.com
- On SigNet: [Employee Relations Contact Form](#)
- North America Legal: legal@signetjewelers.com
- UK HR: hradviceuk@signetjewelers.com
- UK Legal: uklegal@signetjewelers.com
- Loss Prevention: LossPreventionAK@signetjewelers.com

International T.I.P.S.* Phone Line:

- North America: 800-984-TIPS (8477)
- Israel: 844-431-3618
- United Kingdom: 0808-234-6148
- India: 800-984-TIPS (8477)
- Ireland: 855-325-1982
- Botswana: 833-725-5473

*The T.I.P.S. reports are received and processed by an independent company that specializes in taking calls and reviewing anonymous concerns submitted. They then provide details of the issue to Signet investigators who investigate the concern.



Critical Thinking

I think a coworker submitted a false T.I.P.S. report about me to hurt my credibility. What can I do?

All team members must submit T.I.P.S. reports in good faith. Every report is thoroughly investigated to ensure fairness for everyone involved. Be open and forthcoming with the investigators and know that any necessary, corrective action will be taken based on the findings.

Regardless of which reporting resource is utilized, the same process will be followed, as denoted below.



Disclosure Process

The Disclosure Process makes it easy for team members to:

- Report a possible conflict of interest
- Report gifts given or received
- Request an exception to a Code policy
- Ask questions or report Code violations

You can find the Disclosure Process form with step-by-step instructions in Workday under the "My Disclosure" app on the home page or [click here for a brief video demonstration](#).

“

“When we speak up, we give leadership the chance to do what’s right. Trusting them to act on wrongdoing strengthens our culture, protects our values and brands, and reminds us that together - we create a workplace where integrity always wins.”

Ebony Yeboah-Amankwah
 VP Compliance & Ethics, AGC