SIGNET JEWELERS



2025

SIGNET JEWELERS

Responsible Sourcing Protocol

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Signet Responsible Sourcing Protocol ("SRSP")

Updated September 2025

1: Signet's Commitment to Responsible Sourcing

Signet Jewelers (Signet), which includes 11 brands and a jewelry repair business unit, has taken a leadership role in the development of harmonized industry guidance and standards for many years to ensure that our jewelry and all components are made with integrity and sourced from a supply chain that is held to a high standard. As part of our core values, we work towards continuous improvement and always strive to do the right thing. While the diamond and jewelry industries are associated with many celebratory moments, they are also connected to complex supply chains filled with concerns about the origin of many materials – such as gold, natural and lab grown diamonds, and colored gemstones. The industry as a whole has taken steps to improve the transparency and integrity of the entire jewelry supply chain.

As the world's largest retailer of diamond jewelry, we know we must lead by example. Our dedication to product integrity is at the core of how we do business. When a customer purchases jewelry from a Signet brand, they assume that our jewelry has been sourced responsibly. When a customer asks a question about our sourcing practices, our Team Members have the information available to answer them. We are not only dedicated to our own supply chain but are leading the efforts to foster increasingly transparent and responsible jewelry supply chains around the world.

Signet is fully committed to the responsible sourcing of our products and the respect for human rights, and we expect the same from our suppliers around the world. We continually strive to assure our customers, employees, investors and other stakeholders that our supply chain avoids action that may directly or indirectly finance armed conflict and serious human rights violations around the world including the Democratic Republic of Congo and its adjoining countries.

Ensuring the integrity of the supply chain is an issue that affects the entire jewelry industry. Signet therefore believes it is often best to address the challenges through dedicated industry organizations. Signet is a Founding and Certified member of the Responsible Jewellery Council (RJC), the world's leading standard-setting organization for the entire diamond, jewelry and watch industry. As a Founding Member and active participant, we fully support the RJC's membership Code of Practices and Chain of Custody standards.

Signet is also active in cross-sector coalitions and working groups that reach beyond the jewelry industry to ensure that companies respect human rights and avoid contributing to armed conflict. In particular, Signet supports the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, which forms the basis of the Signet Responsible Sourcing Protocol ("SRSP"), covering all materials supplied to Signet.

Throughout our supply chain, whether we are sourcing directly from mining companies, from the open market or buying from jewelry manufacturers, we have a rigorous due diligence process. Our verification process includes internal and third-party audits, as well as third-party verification such as RJC certification.

2: Signet and Responsible Sourcing

a: Definition of Responsible Sourcing

Signet's responsible sourcing policy is aligned with the Organisation for Economic Co-operation and Development (OECD), Due Diligence Guidance for Responsible Supply Chains and follows the Responsible Jewellery Council (RJC) Code of Practices standard which defines responsible ethical, human rights, social, and environmental practices for businesses in the jewelry supply chain. The objectives of the Code of Practices are to;

- Provide a common standard for RJC Members that builds on international standards for responsible business practices.
- Set out the mandatory expectations for the establishment, implementation and maintenance of policies, procedures and practices in order to manage issues within the business's control.
- Establish provisions that can be independently audited to provide objective evidence for the granting of RJC Certification.
- Drive improvement of business practices for the diamond and jewelry supply chains.

b: Signet's Responsible Sourcing Policy

Signet believes that a responsible conflict-free supply chain is fundamental to the reputation of the diamond and jewelry industries as a whole, and we are committed to continue our efforts to advance responsible sourcing throughout the supply chain.

The diamond and jewelry industries share a responsibility to meet consumer expectations about the standards for diamond and jewelry production. Today all businesses are expected to take responsibility for their supply chains, especially with respect to human rights and labor practices. These concerns are articulated by a significant body of international and national law, as well voluntary standards such as the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

As a leading international jeweler Signet works with governments, trade associations, NGOs and jewelry suppliers around the world to implement responsible supply chain standards. The Signet Responsible Sourcing Protocol (SRSP) is designed to ensure that Signet's supply chain does not contribute to conflict, human rights abuses or money laundering.

We assumed an industry-leading role by establishing our Signet Responsible Sourcing Protocols ("SRSPs") for **Gold**, for **Tin, Tungsten and Tantalum (3Ts)** which became company policy for all suppliers in 2013. The SRSPS for gold and 3Ts enabled Signet to file "conflict-free" reports in compliance with the U.S. "Dodd Frank Act" (H.R. 4173), the Wall Street Reform and Consumer Protection Act's Amendment, referred to as the Conflict Mineral, Section 1502 Amendment.

Signet expanded the SRSPs in 2017 when we introduced the SRSP for **Natural Diamonds** and again in 2018 when we introduced the SRSP for **Silver and Platinum Group Metals. A Colored Gemstones** and **Laboratory Grown/Created Diamonds** appendix to the SRSP were included and are policy for all suppliers as of 2020.

A revision to the SRSPs in 2018 combined all Signet Responsible Sourcing Protocols into one guidance document, with the compliance criteria for each mineral listed in the appendices.

By closely collaborating with key partners throughout our supply chain, we designed flexible and adaptable systems that raise the standard for responsibly sourcing raw materials in the entire jewelry

supply chain. The Protocol is aligned with the Organisation for Economic Co-operation and Development (OECD), Due Diligence Guidance for Responsible Supply Chains.

The cornerstone of compliance with the SRSPs is a requirement that all suppliers report to Signet annually that they are sourcing materials supplied to Signet responsibly and in conformance with the requirements of the SRSP for all of the relevant minerals in their supply chains.

c: Signet Supplier Policy

Signet aims to pursue its business activities in what it considers to be an ethical and professional manner. Specifically, and subject to the needs of its business, it aims to promote stable, sustainable, long-term relationships with its suppliers and other business partners. Signet intends to live by these principles within its own operations and has adopted social and environmental principles and policies to this effect.

All Signet suppliers, and in turn their suppliers, should understand Signet's standards as stipulated in the Signet Supplier Code of Conduct. Our Supplier Code of Conduct is included in our Vendor Buying Agreement ("VBA"), contracts and operating agreements, that provides Signet's expectations of suppliers to align with our responsible sourcing practices.

Signet encourages suppliers to ensure that the Code of Conduct is communicated throughout their supply chain. In accordance with Signet's Vendor Buying Agreement ("VBA"), contracts and operating agreements, the same obligations and criteria for compliance with the SRSP will apply to subcontractors as apply to Signet's direct suppliers. Suppliers therefore need to pass on the requirements of the SRSP to all subcontractors.

Compliance with the Signet Responsible Sourcing Protocol is a requirement for all Signet suppliers and is an intrinsic element of the Supplier Code of Conduct.

This requirement is verified annually through a dedicated supplier SRSP compliance report, which is in turn required for validation of the annual Signet contract.

d: Signet and Membership of the Responsible Jewellery Council ("RJC")

Signet is a founding and certified member of the **Responsible Jewellery Council ("RJC")**, which is the global standard for responsible practices for diamonds (natural and lab grown) and colored gemstones' trader, cutter or polisher, jewelry manufacturer, gold and/or platinum group metals trader or refiner, and jewelry retailers within the diamond and jewelry industries. Companies certified under the RJC's Code of Practices are demonstrating their commitment to the reputation of the jewelry industry, which is fundamental to maintaining consumer confidence.

As a result and aligned with Signet's dedication to the continuous improvement in the integrity of global jewelry supply chain, Signet has made RJC membership and certification a requirement for all suppliers **of covered materials.** Suppliers which achieve RJC certification with CoP 2024 and include compliance with the SRSP for each covered material they supply to Signet are not required to be audited separately, unless there are special reasons or identified risks which may cause Signet to require an additional audit.

e: Application Scope of the SRSP

The SRSP protocol and Signet's RJC membership requirements apply to all suppliers of jewelry and suppliers of loose natural and lab grown diamonds, or loose colored gemstones to Signet, including all other organizations or "doing business as" names or vendor numbers for which the supplier provides products to Signet. This scope therefore applies to the supplier's company which has direct transactions with Signet, as well as the supplier's subsidiary or parent companies, associate companies, affiliate

companies, sister companies, companies with shared, joint or associated ownership which are part of the supplier's supply chain.

As an example, if a supplier's direct relationship with Signet is through a U.S. sales office but this office also has related manufacturing operations in India and Belgium which are part of that supplier's supply chain to Signet, the SRSP and the RJC membership requirement will apply to the U.S. company, the Indian company and the Belgian company.

3: Supply Chain Due Diligence

a: OECD Due Diligence Guidance Summary

Signet supports the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and has followed this guidance in the development and implementation of the SRSP. Compliance with the SRSP requires all suppliers to follow the same procedures in conducting due diligence on their own supply chains.

The OECD Due Diligence Guidance clarifies how companies can identify and better manage risks throughout the entire mineral supply chain, from miners, local exporters and mineral processors to the manufacturing and retail companies that use these minerals in their products. The Guidance is applicable to all minerals and is global in scope.

The Guidance is now referenced and used in regulations in the United States is the basis for the European Union (EU) Conflict Minerals regulation effective as of January 1, 2021. The regulation covers tin, tantalum, tungsten and gold (3TGs) sourced from the Democratic Republic of the Congo (DRC) and adjoining countries, though it also addresses minerals sourced from other high-risk areas. The EU regulation applies to importers of minerals and metals into the EU.

Details of the OECD's 5-Step Framework are explained in Section 4a below.

b: Signet's Supply Chain Due Diligence

Starting with Gold and the "3Ts" in 2011, and subsequently extending the scope into Natural Diamonds, Silver, Platinum Group Metals, Colored Gemstones and Laboratory Grown/Created Diamonds, Signet conducted extensive due diligence on the source and chain of custody of all of its products to understand the flow of minerals through the complex and fragmented supply chains to Signet. This due diligence, a process that has been developed and improved over many years, required a rigorous analysis of Signet's supply chains, and consultation with Signet's suppliers as well as leading global organizations.

From this analysis and these consultations, Signet has designed and implemented the Signet Responsible Sourcing Protocol ("SRSP"), introduced for gold and 3Ts as company policy in 2013 and continuously updated and improved thereafter to include natural diamonds (in 2017), silver and platinum group metals (in 2018) and colored gemstones and laboratory-grown/created diamonds (in 2020), which have led the entire jewelry industry in providing guidance to suppliers to ensure all products supplied to Signet are responsibly sourced and are "conflict free" and with respect for human rights.

c: Due Diligence Requirements for Suppliers to Signet

All suppliers of diamonds (natural and lab grown), colored gemstones, and/or jewelry (components and/or finished jewelry) to Signet are required to undertake due diligence on their own supply chains in accordance with the OECD's Due Diligence Guidance 5-step framework to ensure that these supplies are responsibly managed and are "conflict-free" and sourced with respect for human rights.

This includes:

- having company management systems in place and a compliance officer nominated to Signet
- undertaking a detailed mapping of the supply chains for all minerals, and identifying SRSP-compliant sources as specified for each mineral in the appendices to this SRSP
- identifying any risks in the supply chains and mitigating such risks in accordance with the SRSP requirements for each mineral and OECD due diligence guidelines
- completing the annual SRSP compliance report and the associated independent audit (if required by Signet) accurately and on time, in accordance with Signet's requirements.

4: SRSP Core References

Core references and standards which Signet suppliers should use to comply with the SRSP are;

a: OECD Due Diligence Guidance (Summary)

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals is a core reference for the SRSP. Click here for the full OECD Due Diligence Guidance document.

All Signet suppliers should follow the OECD Due Diligence Guidance framework, at least and especially Steps 1 and 2, as below, as they relate to the SRSP:

1. Establish strong company management systems.

    a) Adopt and have available to Signet a company policy for the supply chain of minerals included in the SRSPs. Suppliers may wish to refer to Annex II of the OECD Due Diligence Guidance, which includes a model supply chain policy. The supplier's policy should incorporate the compliance requirements of the SRSP, against which due diligence is to be conducted.
    b) Structure internal management to support supply chain due diligence and the requirements of the SRSP.
    c) Establish a system of controls and transparency over the mineral supply chain in accordance with the SRSP compliance requirements for each mineral.
    d) Strengthen company engagement with suppliers. A supply chain policy should be incorporated into contracts and/or agreements with suppliers in accordance with the requirements of the SRSP, ensuring compliance with all active sanctions.
    e) Establish a company-level grievance mechanism as an early-warning risk-awareness system.

2. Identify and assess risks in the supply chain.

    a) Identify any risks in their supply chain which may be contrary to the compliance requirements of the SRSP for each mineral.
    b) Assess risks of any adverse impacts in light of any non-compliance with the SRSP for each mineral.

If any risks are identified under Steps 1 and 2, these should be notified to Signet (at info@signetsrsp.com), and the supplier must design and implement a strategy and action plan to respond to these risks, in accordance with Steps 3 to 5 of the OECD Guidance, which must be agreed by Signet.

b: Responsible Jewellery Council Certification

Signet requires all suppliers of covered materials to be members of the Responsible Jewellery Council ("RJC"), which is the global standard for responsible practices in the entire jewelry industry. RJC membership should cover all the entities under the control, influence or common ownership of the supplier which are involved in Signet's supply chain (for example, factories in India, China, Thailand etc. as well as US sales offices), not only the company which directly supplies products to Signet, in accordance with the Application Scope of the SRSP in 2e above. Acquisitions by any supplier should be added to any exiting RJC membership scope within 12 months of the acquisition.

New RJC members have two years from their join date to achieve RJC certification. Failure to achieve initial certification on time will result in their member page on the RJC website being suspended and not publicly visible. They will then have a 6-month grace-period to achieve certification.

Existing RJC members who fail to achieve re-certification prior to the expiration of their current certification will result in their member page on the RJC website being suspended and not publicly visible. They will then have a 6-month grace-period to achieve re-certification.

The scope of Signet suppliers' RJC Certification audit must include all materials from all locations supplied to Signet (as confirmed by your SRSP Report). The RJC auditor will check the list of materials in your SRSP report to the membership scope list of materials.

Suppliers which achieve certification with the RJC's CoP2024 are not required to be audited separately by Signet, for the SRSP and also for other factory/ethical audits, for as long as the certification is valid (normally 3 years). Suppliers must inform Signet of any significant changes in the scope of RJC membership, lapses or failure to achieve RJC certification.

Any supplier which cannot provide RJC certification with SRSP compliance for all metals or minerals from all locations may be subject to an audit of their SRSP Compliance Report and/or an independent /ethical audit of their factories by an independent third party audit firm, based on a risk assessment conducted by Signet. Signet suppliers are responsible for the expense of all audits.

For non-RJC members, or for RJC members whose RJC membership or current certification scope does not cover all products supplied to Signet, Signet may require suppliers to undertake an independent audit of their SRSP Compliance Report, based on Signet's risk assessment relating to the supplier's report.

c: The Kimberley Process Certification Scheme and the World Diamond Council System of Warranties

Signet requires all suppliers to comply with the Kimberley Process Certification Scheme and the World Diamond Council System of Warranties.

The Kimberley Process Civil Society Coalition has set out "Eight Key Issues" for improvement in the diamond supply chain. Signet acknowledges this important statement and supports on-going cross-sector collaboration to improve transparency in the global natural diamond supply chain.

All Signet suppliers (whether or not they supply natural diamonds or natural diamond jewelry) must include the warranty statements relating to the WDC System of Warranties in all invoices and delivery notes, in addition to the SRSP warranty statement. (see "Warranty Statements").

d: The London Bullion Market Association Responsible Sourcing Standard

The London Bullion Market Association (LBMA) Responsible Sourcing Programme was set up to consolidate, strengthen, and formalize existing standards of refiners' due diligence. The Responsible

Gold Guidance has been mandatory for all gold "Good Delivery" refiners since 2012, and the LBMA has expanded the scope of its responsible sourcing framework to include silver, which became a mandatory requirement for all silver "Good Delivery" refiners from 1 January 2018.

The LBMA's requirements for refiners' "Good Delivery" accreditation, incorporating the Responsible Sourcing standard, are a core reference for the SRSP for precious metals - gold, silver, platinum and palladium. Signet encourages all suppliers using precious metals to ensure refiners in their supply chain are on the current LBMA "Good Delivery" list (see www.lbma.org.uk). Other compliance standards relating to precious metals refiners are listed in the appendices for compliance requirements for gold and for silver/PGMs.

e: Cross-recognition of Other Industry Standards

Signet encourages the cross-recognition and harmonization of relevant standards to reduce unnecessary audit duplication.

For natural diamonds, the SRSP is harmonized with the De Beers Best Practice Principles, the World Federation of Diamond Bourses Code of Conduct and Chain of Warranties, the Jewelers of America Code of Professional Practices, the International Diamond Manufacturers Association Code of Conduct, the, the United States Diamond Source Warranty Protocol, and the Diamond Development Initiative's Maendeleo Diamonds Standard.

For precious metals, the SRSP recognizes SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry), the China Chamber of Commerce of Metals Minerals & Chemicals Importers & Exporters (CCCMC) Guidelines for Responsible Minerals Supply Chains and, based on independent expert assessment, the SRSP also recognizes the DMCC "Dubai Good Delivery" list for gold (see https://www.dmcc.ae/gateway-to-trade/commodities/gold/accreditation-initiatives) as equivalent to the LBMA guidance for the supply of gold from certified refineries.

The SRSP also recognizes the CRAFT code for artisanal and small-scale mining ("ASM") (see https://www.responsiblemines.org/en/2020/10/craft_v2-0/), the Fairtrade Gold Standard through registered refineries (https://www.fairtrade.net/standard/gold).

For 3Ts and gold, the SRSP recognizes the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) and the list of conformant 3Ts and gold smelters and refiners at https://www.responsiblemineralsinitiative.org/smelters-refiners-lists/

In case any Signet supplier relies on any trade associations, membership organizations on any other organization for their responsible supply chain policy, suppliers should establish what standards or guidance are used by these organizations to provide assurance or responsible practices to the supplier's supply chain and ensure that Signet confirms that these standards are consistent with the requirements of the SRSP.

f: International Policy Positions (by governments and civil society)

As a leading international jeweler, Signet works with governments, trade associations, civil society (NGOs) and jewelry suppliers around the world to implement responsible supply chain standards. The Signet Responsible Sourcing Protocol (SRSP) is designed to ensure that Signet's supply chain complies with applicable laws and does not contribute to conflict or human rights abuses.

Signet will not purchase diamonds (natural or lab grown), colored gemstones or jewelry in any form from companies or entities subject to United Nations, US, UK, Canadian or EU sanctions. Suppliers must

conduct thorough due diligence in support of Signet's legal requirements in this and all current or future areas of regulatory compliance.

Signet reserves the right to restrict or forbid without notice the supply of any materials in response to policy positions by governments and/or reports by civil society, which may relate to human rights abuses, contribution to conflict, or social and environmental disturbance.

5: Compliance with the Signet Responsible Sourcing Protocol (SRSP)

Summary:

Suppliers must ensure that they follow these compliance procedures and ensure all criteria are met for the minerals supplied to Signet as listed in the relevant Appendices to the SRSP.

Compliance with the SRSP is based on the OECD's Due Diligence Guidance and the Responsible Jewellery Council Code of Practices.

"Responsibly sourced" means that suppliers will avoid contributing to human rights abuses and/or conflict through their sourcing practices. Suppliers must map their supply chain ensuring compliance with all active sanctions and employ due diligence to identify risks and take appropriate measures to mitigate any identified risks.

In accordance with Signet's Supplier Code of Conduct, the same obligations and criteria will apply to subcontractors as apply to Signet's direct suppliers. Suppliers will therefore need to pass on the requirements of the SRSP to all subcontractors.

General Compliance Requirements

a: Management Systems

All suppliers should have a dedicated contact person for Signet who acts as "compliance officer" who is responsible for the annual SRSP and other required compliance reports and management of any related audits (e.g. RJC certification, SRSP and/or ethical audits).

Suppliers must have terms of business with suppliers and policies and procedures in place which are consistent with the SRSP compliance criteria, ensuring your terms of business require compliance with all current sanctions. These terms of business must be documented and available for review by audit if requested.

Suppliers must be able to demonstrate through transaction documentation that these terms of business and policies have been implemented throughout their business, through documentation such as invoices, delivery notes, product certificates etc.

b: Supply Chain Due Diligence

Suppliers must have a demonstrable due diligence procedure to analyse and map their supply chains (including clear identification of their own suppliers, KYC details, terms of business in accordance with the SRSP and any provenance of materials).

Suppliers are required to undertake due diligence on all sources of diamond and jewelry materials included in the SRSP, even if the quantity of the material is small. There is no "de minimis"/minimum level of supply, so for such small volumes (e.g. of plated materials, diamond accents, repairs etc.), suppliers

are required at a minimum to ask subcontractors to verify their sources, and this inquiry should be documented.

Through this due diligence, suppliers should be able to identify any risks in their supply chain, especially any risks relating to the compliance requirements of the SRSP.

Suppliers must have a procedure to assess the possibility of adverse impacts of these risks relating to the compliance criteria of the SRSP and be prepared to take measures to mitigate or eliminate these risks.

c: Identification of Risks, "Red Flags" and Enhanced Due Diligence

If a supplier identifies a risk in their supply chain to Signet, the supplier should undertake enhanced due diligence as follows;

i: Report findings of the supply chain risk assessment to Signet at info@signetsrsp.com
ii: Devise and adopt a risk management plan. Devise a strategy for risk management by either
(a) continuing trade throughout the course of measurable risk mitigation efforts
(b) temporarily suspending trade while pursuing ongoing measurable risk mitigation
(c) disengaging with a supplier after failed attempts at mitigation or where a company deems risk mitigation not feasible or unacceptable
iii: Implement the supplier's risk management plan, monitor and track performance of risk mitigation efforts and report back to Signet.
iv: Undertake additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances.

d: Know Your Counterparty (KYC)

Suppliers are required to apply Know Your Customer/Counterparty principles ("KYC") to their supply chains, which require businesses to establish the identity of all organizations with which they deal, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious. KYC procedures may include:

i. Collection and analysis of basic identity information.
ii. Name matching against lists of known parties.
iii. Details of the supplier's policies and procedures (especially relating to identification of sources of repurposed supply).
iv. Determination of the supplier's risk, especially in terms of propensity to supply minerals from an area of conflict or human rights abuses and the trade of minerals on a cash transaction basis.
v. An expectation of a customer's transactional behavior.
vi. Monitoring of a customer's transactions against their expected behavior and recorded profile.

Documentation relating to the application of KYC is required for all sources of repurposed materials.

e: Conflict-Free

Signet will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals used in supplies to Signet.

Direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who;

i: Illegally control mine or manufacturing sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain and/or

ii: Illegally tax or extort money or minerals at points of access to mine or manufacturing sites, along transportation routes or at points where minerals are traded; and/or
iii: Illegally tax or extort intermediaries, export companies or international traders.

Suppliers must ensure that all minerals supplied to Signet do not directly or indirectly contribute to conflict.

Suppliers should ensure that the minerals are "conflict-free" through compliance with the criteria listed in the Appendices to the SRSP and associated standards and guidance (e.g. RJC certification, Kimberley Process certification, LBMA Responsible Sourcing standards).

Suppliers may source from areas of conflict (e.g. DRC and neighbouring countries) providing those sources are certified in accordance with international minerals standards as listed in the Appendices to the SRSP, and any such certification must require an independent third-party audit.

In the absence of verification against such accredited standards in the SRSP, suppliers must undertake due diligence to ensure minerals are not sourced from areas of conflict.

f: Human Rights

Suppliers shall respect Human Rights and observe the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances, including as a minimum:

i. A policy commitment to respect Human Rights
ii. Inclusion of measures in the supplier's due diligence process that seek to identify, prevent, mitigate and account for how they address their impacts on Human Rights
iii. Where suppliers identify that they have caused or contributed to adverse Human Rights impacts, they shall provide for or cooperate in legitimate processes to enable the remediation of those impacts

Suppliers' due diligence on their supply chains should also verify that their own suppliers also follow these minimum Human Rights requirements.

Suppliers' policies and practices relating to the respect and protection of Human Rights should follow SA 8000 standard (found at https://sa-intl.org/resources/sa8000-standard/) and/or the RJC Code of Practices standard's section on Human Rights (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COP-Standard-1.pdf). For further details see the Human Rights Appendix.

g: Product Integrity & Disclosure

Suppliers must ensure that the minerals and products supplied to Signet and to the supplier through the supplier's supply chain are correctly and accurately represented, including providing certificates where applicable (e.g. diamond grading certificates, gold purity/assay certificates).

Suppliers must adhere to the US Federal Trade Commission's Guides for the Jewelry, Precious Metals, and Pewter Industries, as amended in 2018. The FTC Guides apply to all levels of the industry and are especially focused on the avoidance of misleading or deceptive language.

h: AML, Bribery and Facilitation Payments

Suppliers must establish policies that:

i. Prohibit bribery in all business practices and transactions carried out by the supplier and by agents acting on behalf of the supplier.
ii. Protect Employees from any penalty or adverse consequences for identifying in good faith concerns related to suspected Bribery, for refusing to participate in Bribery, or refusing to pay a Facilitation Payment where Facilitation Payments are prohibited.
iii. Set the criteria and approval procedures to be followed by Employees in respect of the offer and/or acceptance of gifts with third parties.
iv. Train relevant managers and employees on policies and procedures.
v. Record relevant gifts to and from third parties in a gift register, as per the supplier's policy.
vi. Investigate any incidences of suspected bribery within their organisation.

Where facilitation payments are permitted by applicable law, suppliers shall:

i. Undertake actions to eliminate all Facilitation Payments, or to reduce the size and frequency of Facilitation Payments over time.
ii. Ensure that any Facilitation Payments are of limited nature and scope.
iii. Implement controls to monitor, oversee and fully account for any Facilitation Payments made by or on behalf of the supplier.

Suppliers shall apply Know Your Counterparty ("KYC", see above) principles for business partners that are suppliers or customers, including monitoring transactions for unusual or suspicious activity and reporting suspicions of money laundering or finance of terrorism to the relevant designated authority.

Suppliers shall maintain records of all cash or cash-like transactions which occur above the relevant defined financial threshold under applicable law and, where required, report these to the relevant designated authority.

i: Early Warnings, Grievances and Whistle-Blowing

Suppliers must have evidence of a company-level, or industry-wide, grievance mechanism as an early-warning risk-awareness system. Suppliers can also use the annual SRSP Compliance Report as a means of communicated grievances relating to the SRSP to Signet. Suppliers can also report risks in their own or others' supply chains through the SRSP Compliance Report.

All grievances or reporting of identified risks will be treated in strict confidence by Signet.

j: Additional or Unforeseen Compliance Requirements

Signet may require suppliers to comply with additional or unforeseen requirements from time to time.

In these circumstances, Signet will advise the supplier's designated contact person for SRSP compliance of any additional compliance requirements, with details of the compliance requirements, compliance criteria and required timescales for compliance.

Compliance for additional or unforeseen circumstances may be outside the normal SRSP reporting procedures and timescales.

6: Warranty Statement Requirements

Suppliers will be required to declare compliance with the SRSP in commercial documentation as defined by Signet, such as supplier agreements, invoices, delivery notes etc. Following successful reporting of compliance with the SRSP, all Signet suppliers must include the following warranty statements in full on all invoices and delivery notes, irrespective of the products and minerals supplied to Signet. This applies

to all transactions whether delivered to Signet distribution centers or drop shipped directly to stores and customers.

Signet has halted all trade in precious metals (gold, silver and/or platinum group metals (PGMs), diamonds (natural or lab created) and/or colored gemstones that originate from sanctioned Russian sources and suppliers are required not to supply the same to Signet even though the country(s) in which you operate may not have imposed sanctions on Russian precious metals and diamonds.

By including the existing Signet SRSP warranty statement on each invoice that accompanies product to Signet, you are certifying that no precious metals, diamonds (natural or lab grown) and/or colored gemstones of Russian origin purchased after February 24, 2022, are included. This policy will remain in effect until an international consensus is reached that the human right violations have ceased, and Signet notifies you of the same.

Warranty statements to be included in full on all invoices and delivery notes, as mentioned above:

SRSP:

> ***The seller warrants that these products have been supplied in compliance with the Signet Responsible Sourcing Protocol ("SRSP").***

WDC SoW:

> ***The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines.***

For suppliers of LGDs only:

> ***Any laboratory-grown diamonds herein supplied comply with the SRSP and are warranted not to include any natural diamonds or any material which is not laboratory-grown diamond.***

7: Reporting Requirements

All new suppliers to Signet will be expected to complete a SRSP, DDQ (Third Party Due Diligence Questionnaire) and E&S (Environmental and Social) compliance reports ***before*** any commercial activity relating to the supply of jewelry and/or jewelry components (e.g. loose natural or lab grown diamonds) and/or repair services between the companies begins. Suppliers are also required to declare the status of their RJC membership.

All suppliers are required to report compliance with the SRSP, DDQ and E&S annually through an online compliance report provided by Signet, covering all relevant minerals supplied to Signet. The report is normally conducted around September every year.

Suppliers are required to provide a valid contact person for completion of the SRSP Compliance report, who will receive an email notification to establish log-in credentials to complete the report on behalf of all vendor numbers for that supplier to Signet.

Suppliers must ensure that the SRSP compliance report is completed accurately, completely and on time and that the report correctly states all the criteria for compliance for each mineral, as listed in the Appendices to the SRSP.

Suppliers must quote the SRSP compliance report confirmation number as part of the annual contract or buying agreement with Signet (Vendor Buying Agreement or “VBA”), or any other contracts or operating agreements.

8: Auditing Requirements

Suppliers who achieve and maintain RJC certification which includes compliance with the SRSP for each covered material they supply to Signet will be exempt from all Signet audits (SRSP Report documentation as well as factory/ethical audits) for as long as the RJC certification remains current.

Any supplier which cannot provide RJC certification for all metals and/or minerals they supply to Signet and are compliant with the SRSP may be subject to an audit of their current SRSP Compliance Report. If a supplier also uses factories to manufacture jewelry products and/or cut, polish diamonds (natural or lab grown), and/or colored gemstones an ethical audit of those factories by an independent third-party audit firm may also be required, based on a risk assessment by Signet.

Signet will notify suppliers of the requirement for an audit (standalone SRSP Report documentation audit or both ethical audit of factories and SRSP Report audit) as part of the annual SRSP compliance reporting procedure. Suppliers must then appoint an auditor from the SRSP accredited auditor list, all of which are listed on the RJC list of accredited auditors.

The audit must normally be completed within 2 months of the notice of audit from Signet. The supplier must book the audit and provide the necessary audit report to Signet.

The audit should confirm that the supplier has adequate policies in place to comply with the SRSP for the relevant minerals and can demonstrate through transactional documentation that these policies are being implemented. The audit should validate both policy documentation and transaction documentation.

All suppliers to Signet are subject to audit for any reason, at any time. General guidelines are disclosed in the table below.

Signet Supplier Audit Requirements

SIGNET SUPPLIERS RJC MEMBERSHIP STATUS	SIGNET SUPPLIERS AUDIT REQUIREMENT
NON-RJC MEMBER	**YES**, third-party audit of SRSP (documentation audit) may be required. **YES**, ethical audits may be required.
NON-CERTIFIED RJC MEMBER	**YES**, third-party audit of SRSP (documentation audit) may be required. **YES**, ethical audits may be required.
RJC-CERTIFIED MEMBER FOR THE CODE OF PRACTICES 2019 Membership must cover all entities under the control, influence, or common ownership of the supplier that are involved in Signet's supply chain as per the SRSP.	**NO**, third-party audit of SRSP (documentation audit) will not be required. **NO**, ethical audits will not be required.

Detailed Audit Guidance is provided by Signet for suppliers and auditors to manage the audit process, available at https://signetresponsiblesourcing.com/ in the "SRSP Toolkit. This Guidance is applicable for RJC certification audits as well as Signet SRSP Report documentation audits.

9: Signet Support and Training

Details of Signet's Corporate Citizenship and Sustainability program including Responsible Sourcing are available at the Signet corporate website (https://www.signetjewelers.com/). Signet provides additional resources for suppliers, auditors and other stakeholders to understand the requirements of the SRSP and subsequent audits. The dedicated website for the SRSP process is https://signetresponsiblesourcing.com/.

This website contains:

- In the SRSP Toolkit:
  - All Signet policy documents, such as the SRSP and SRSP Audit Guidance
  - Copies of presentations and training webinars
  - SRSP Reporting and Audit Training document and templates
- Frequently Asked Questions (FAQs) relating to the SRSP and reporting process
- Access for suppliers to complete the annual SRSP Compliance Report.

Signet provides online training webinars to educate suppliers on the annual SRSP, E&S and DDQ Compliance Reporting process as well as audit requirements.

All suppliers can contact the Signet Responsible Sourcing team by email at info@signetsrsp.com.

10. The Environment and Sustainable Development Goals (SDGs)

Signet believes that responsible business is good business, without causing harm to people or the planet, and that this can only be achieved by working together, and in partnership with our suppliers. Signet is a member of the UN Global Compact, the world's largest corporate sustainability initiative, which reaffirms our existing commitments to the Ten Principles of the UN Global Compact and the Sustainable Development Goals.

The jewelry and diamond industries are working together to measure our environmental impact and strategize programs to reduce our greenhouse gas emissions. In line with the Decade of Action, Signet and our industry partners launched ambitious programs to set targets to work towards the SDGs. In 2021, the Responsible Jewellery Council's (RJC) announced The Roadmap to 2030 to coordinate collective action on realizing the SDGs in the jewelry industry. Also in 2021, De Beers released the Building Forever 2030 Goals. and Signet published its 2030 Corporate Sustainability Goals. .

Signet understands that some companies **are** actively collecting climate and environmental data and are well advanced in these areas, while others may be just beginning the journey. **Completion of the** Environmental and Social ("E&S") Report **became mandatory for all suppliers to Signet beginning the 2022 reporting process.** You can obtain a copy of the questions in the E&S Report at the Signet Responsible Sourcing Toolkit.

SRSP GOLD APPENDIX:

SRSP COMPLIANCE REQUIREMENTS FOR GOLD

The requirements in the SRSP apply to **all gold products** (finished and components), and to all products containing gold.

Suppliers are required to undertake due diligence on all sources of supply of gold, even if the quantity of the material is small. There is no "de minimis"/minimum level of supply, so for such small volumes (e.g. of plated materials, repairs, flashing etc.), suppliers are required at a minimum to ask subcontractors to verify their sources of gold, and this inquiry should be documented.

Suppliers are required to certify the gold supplied to Signet, either by certification of all gold manufacture and supply, or, if this is not possible, by segregating manufacture and supply of gold to Signet from the manufacture and supply of gold to other customers.

The SRSP identifies the requirements for responsibly sourced and "conflict-free" gold at all levels in the supply chain, as below:

Signet has halted all trade in precious metals that originate from sanctioned Russian sources and suppliers are required not to supply the same to Signet even though the country(s) in which you operate may not have imposed sanctions on Russian precious metals.

By including the existing Signet SRSP warranty statement on each invoice that accompanies product to Signet, you are certifying that no precious metals (gold) of Russian origin purchased after February 24, 2022 are included. This policy will remain in effect until an international consensus is reached that the human right violations have ceased, and Signet notifies you of the same.

1: Refineries

The SRSP only accepts gold from Refinery sources as follows:

- Gold refiners on the LBMA good delivery list for the reporting year
  - (see https://www.lbma.org.uk/ , "Good Delivery", "Gold List")

or

- Gold refiners on the Responsible Minerals Initiative Conformant Smelters and Refiners list for the reporting year
  - (see https://www.responsiblemineralsinitiative.org/)

or

- Gold refiners on the DMCC "Dubai Good Delivery" list for gold for the reporting year
  - (see https://www.dmcc.ae/gateway-to-trade/commodities/gold) or
- Gold refiners which are certified Members of the Responsible Jewellery Council (RJC)
  - (see https://www.responsiblejewellery.com/membership/)

or

- Gold refiners which certify and independently audit that all gold supplies are conflict-free, in accordance with one of the following guidelines/standards;

  i. RJC Chain of Custody Standard for Precious Metals
     - (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COC-Standard-24-12-10.pdf)

ii. RJC Membership certification which includes statements relating to sources and/or supply of conflict-free gold in the RJC's Code of Practices 2019

iii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold
   - (see https://www.oecd.org/ , search "conflict minerals")

iv. Fairtrade Gold Standard (see https://www.fairtrade.net/standard/gold)

or

- Gold refiner which are certified under SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)

or

- Gold refiners which certified that all supplies to the refinery are from mines which comply with the World Gold Council Conflict-free Standard
   - (see https://www.gold.org/about-gold/gold-supply/responsible-gold/conflict-free-gold-standard)

or

- Gold refiners which certify that all supplies to and by the refinery are in accordance with the China Chamber of Commerce of Metals, Minerals and Chemicals Importers & Exports "Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains". Supplies of gold through the Shanghai Gold Exchange are deemed to be compliant with the SRSP.

2: Banks

The SRSP only accepts gold from Banks as follows:

- Banks which certify and independently audit that all gold is supplied from refineries which fulfilll the SRSP criteria under "Refineries" as above.

or

- Banks which certify and independently audit that all gold supplies are responsibly sourced and "conflict-free", in accordance with one of the following guidelines/standards;

i. RJC Chain of Custody Standard for Precious Metals
   - (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COC-Standard-24-12-10.pdf))

ii. RJC Membership certification which includes statements relating to sources and/or supply of conflict-free gold in the most current RJC's Code of Practices

iii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold
   - (see https://www.oecd.org/, search "conflict minerals")

3: Precious Metals Trading Companies/Alloy Suppliers

The SRSP only accepts gold from Precious Metals Trading Companies and Alloy Suppliers as follows:

- Companies which certify and independently audit that all gold is supplied from refineries and/or banks which fulfill the SRSP criteria under "Refineries" and "Banks" as above.

or

- Companies which certify and independently audit that all gold supplies are responsibly sourced and "conflict-free", in accordance with one of the following guidelines/standards;

    i. RJC Chain of Custody Standard for Precious Metals (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COC-Standard-24-12-10.pdf)
    ii. RJC Membership certification which includes statements relating to sources and/or supply of conflict-free gold in the RJC's Code of Practices 2019
    iii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold (see https://www.oecd.org/, search "conflict minerals")
    iv. SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)
    v. Fairtrade Gold Standard (https://www.fairtrade.net/standard/gold))

4: Subcontractors of Component Parts or Finished Products

SRSP only accepts gold from Subcontractors of Component Parts or Finished Products as follows:

- Subcontractors which certify and independently audit that all gold is supplied from refineries, banks and/or precious metals trading companies which fulfill the SRSP criteria under "Refineries", "Banks" and "Precious Metals Trading Companies" as above, and repurposed gold as below.[1]

or

- Subcontractors which certify and independently audit that all gold supplies are responsibly sourced and "conflict-free", in accordance with one of the following guidelines/standards:

    i. RJC Chain of Custody Standard for Precious Metals (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COC-Standard-24-12-10.pdf))
    ii. RJC Membership certification which includes statements relating to sources and/or supply of conflict-free gold in the RJC's Code of Practices 2019
    iii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold (see https://www.oecd.org/, search "conflict minerals")
    iv. SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)
    v. Fairtrade Gold Standard (https://www.fairtrade.net/standard/gold)

5: Repurposed **Gold**

The SRSP only accepts repurposed gold as follows:

- Suppliers which certify and independently audit that all repurposed gold is identifiable as its own production and supply, i.e. that the scrap gold is;
    i. Returned product from customers
    ii. Pre-owned products
    iii. Faulty inventory

[1] *The terms recycled, repurposed, and reclaimed refer to used metal objects that have been smelted and transformed into new products or components. This process involves melting down, reshaping, resolidifying the metal, and placing the new material back into the supply chain.*

iv. Scrap and waste gold arising during manufacturing

or

- Suppliers which certify and independently audit that all repurposed gold is acquired according to Know Your Customer/Counterparty principles ("KYC"), which require businesses to establish the identity of all organisations with which they deal, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious. KYC procedures may include;

  i. Collection and analysis of basic identity information.
  ii. Name matching against lists of known parties.
  iii. Determination of the supplier's risk in terms of propensity to supply gold from an area of conflict.
  iv. An expectation of a customer's transactional behavior.
  v. Monitoring of a customer's transactions against their expected behavior and recorded profile.

or

- Companies which certify and independently audit that all gold supplies are responsibly sourced and "conflict-free", in accordance with one of the following guidelines/standards;

  i. RJC Chain of Custody Standard for Precious Metals (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COC-Standard-24-12-10.pdf))
  ii. RJC Membership certification which includes statements relating to sources and/or supply of conflict-free gold under "Provenance Claims" in the RJC's Code of Practices revised 2013
  iii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold (see https://www.oecd.org/, search "conflict minerals
  iv. SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)

6: "Grandfathered" Gold

The SRSP accepts gold in any form from any of the sources listed above which is held by suppliers, banks, refiners, metals trading companies, scrap suppliers or subcontractors and which has a verifiable date prior to 1 January 2012, in accordance with OECD, LBMA and RJC guidelines.

It is noted that the US "Dodd-Frank" Act Section 1502 rules have an equivalent "grandfathered" date of 1 January 2013: however, the SRSP verifiable date remains 1 January 2012, to remain in accordance with the OECD, LBMA and RJC guidelines.

A verifiable date is one which can be verified through inspection of physical date stamps on products such as gold bars, jewellery hallmarks and/or auditable inventory lists which are specific to the individual item of gold, the component, subcomponent or finished item of jewelry.

7: Exceptions

Exceptions to the SRSP standards listed above may be made on a case-by-case basis. In all such cases, suppliers will be expected to identify and certify the sources of gold, preferably to the refinery, and validate why these sources should be determined as conflict-free. All exceptions must be confirmed in advance and in writing by Signet, and an external assessment and/or independent audit of this validation may be required.

SRSP 3Ts APPENDIX:

SRSP COMPLIANCE REQUIREMENTS FOR TIN, TUNGSTEN AND TANTALUM ("3Ts")

The requirements in the SRSP apply to all products (finished and components), and to all products containing any of the 3Ts.

Suppliers are required to certify the products supplied to Signet are responsibly sourced and "conflict-free", either by certification of all products manufacture and supply which include the 3Ts, or, if this is not possible, by segregating manufacture and supply of products to Signet from manufacture and supply of products to other customers.

The SRSP for conflict-free tin, tungsten and tantalum requires suppliers to certify and externally audit supplies as follows:

1: That the supplier to Signet can identify the smelter/refiner of the tin, tungsten or tantalum, and that the smelter/refiner is listed on the Responsible Minerals Initiative (RMI) Conformant Smelters and Refiners list at https://www.responsiblemineralsinitiative.org/smelters-refiners-lists/,

or

2: That the supplier to Signet can identify the smelter/refiner of the tin, tungsten or tantalum, and that the smelter/refiner can certify that the material has not been sourced from an area of conflict,

or

3: That the supplier to Signet can demonstrate that the supplies to and by the smelter/refiner are in accordance with the China Chamber of Commerce of Metals, Minerals and Chemicals Importers & Exports "Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains."

or

4: That the supplier to Signet has requested that its suppliers and/or subcontractors of tin, tungsten or tantalum identify the smelter/refiner and that the supplier and/or subcontractor can fulfill the requirements under (1), (2) or (3) above,

or

5: That the supplier has, in accordance with OECD guidelines, attempted to identify, to the best of efforts, the smelters/refiners in the supply chain for tin, tungsten or tantalum, and can demonstrate the methodology involved in these efforts. As a result of this due diligence, the supplier can certify that there is no reason to believe that these supplies originate from an area of conflict.

SRSP NATURAL DIAMOND APPENDIX:

SRSP COMPLIANCE REQUIREMENTS FOR NATURAL DIAMONDS

1. General Principles

The SRSP is designed to ensure that all Signet jewelry materials are responsibly sourced. However, the SRSPs recognize that jewelry supply chains are not linear and that these standards must take appropriate account of the differentials. This is especially the case with respect to the natural diamond supply chain.

Therefore, the definition of "source" recognizes that supply chain due diligence is in most cases conducted by a supplier with respect to their supplier. The natural diamond categories are designed so that Suppliers can report diamond sources relevant to their position in the supply chain. However, Suppliers must have a policy to the effect that original producer information is sought from suppliers wherever this information is available. Signet expects Suppliers to take steps to increase the percentage of material supplied to Signet with identified provenance to an original producer, over time.

The SRSP applies to all natural diamonds supplied to Signet including loose rough and polished natural diamonds, and natural diamonds set into finished jewelry.

Signet has halted all trade in natural diamonds that originate from sanctioned Russian sources and suppliers are required not to supply the same to Signet even though the country(s) in which you operate may not have imposed sanctions on Russian diamonds.

By including the existing Signet SRSP warranty statement on each invoice that accompanies product to Signet, you are certifying that no diamonds (natural or lab created) of Russian origin purchased after February 24, 2022 are included. This policy will remain in effect until an international consensus is reached that the human right violations have ceased, and Signet notifies you of the same.

2. Testing for Undisclosed Laboratory Grown Diamonds

2.1 All Suppliers are to take substantive and documented action to avoid the inclusion of undisclosed laboratory-grown, synthetic diamonds, undisclosed treated diamonds or undisclosed diamond simulants in parcels of natural diamonds provided to Signet. To that end, Suppliers must:

2.1.1 Conduct an internal pipeline risk assessment, covering all movement of product, identifying all possible points at which undisclosed laboratory-grown, synthetic diamonds, undisclosed treated diamonds or undisclosed diamond simulants could enter the Suppliers' natural diamond supply chain. Policies, procedures and training must pay special attention to these risk points and mitigate the risks appropriately.

2.1.2 Testing must be implemented on the following bases:

2.1.2.1 Loose polished diamonds - 100% of your loose polished natural diamonds must be tested prior to the natural diamonds being moved into a production environment or set into jewelry. The tested natural diamonds must be sealed immediately following testing, and the sealed natural diamonds carefully secured throughout the jewelry manufacturing process.

2.1.2.2 Finished jewelry – Suppliers should work towards 100% testing. Where this is not possible, suppliers should screen using the De Beers BPP Disclosure Practice Note 2025 as guidance. Suppliers must be able to evidence they are working towards 100% screening of finished jewelry.

2.1.3 Suppliers must be able to demonstrate and evidence that 100% loose natural diamonds are tested and the percentage of set natural diamonds tested and maintain relevant documentation.

2.1.4 Supplier testing must be conducted with the use of the best available detection technology and fully trained staff, or testing may be outsourced to a qualified and accredited gemological testing laboratory. Suppliers should consult the Assure Directory (https://www.naturaldiamonds.com/council/assure-diamond-verification/) to ensure that diamond detection technology employed in their supply chain has been certified under the Assure Standard.

2.1.5 Implement effective and detailed policies, procedures, security, monitoring and training to avoid the possibility for undisclosed laboratory-grown, synthetic diamonds, undisclosed treated diamonds or undisclosed diamond simulants to be switched for natural diamonds during the production process.

Where a Supplier deals in laboratory-grown diamonds the Supplier must have clear policies and/or procedures and take all precautions to ensure that laboratory-grown diamonds are segregated from natural diamond production/polishing/jewelry manufacture/trading and/or any other relevant process in the pipeline at all times. Policies, procedures and training must make specific provision for this risk.

2.1.6 Implement adequate procedures and maintain clear records with respect to product handling, storage and transportation, which will assist in identifying any irregularities.

2.1.7 Implement appropriate training for staff involved in handling, movement or security of product.

2.1.8 These requirements should also be implemented in accordance with Clause 8 - Disclosure.

3. Definitions

3.1 Natural Diamond: “Mineral consisting essentially of carbon crystallized in the isometric (cubic) crystal system, with a hardness on the Mohs’ scale of 10, a specific gravity of approximately 3.52 and a refractive index of approximately 2.42, created by nature.” (ISO 18323)[2]

3.2 Treated natural diamond: “natural diamond having undergone any human intervention other than cutting, polishing, cleaning and setting, to permanently or non-permanently change its appearance. EXAMPLES Coating, fracture filling, heating, irradiation, laser drilling, HPHT treatment or any other physical or chemical process.” (ISO 18323)

3.3 Laboratory-grown diamonds:

“product that has essentially the same chemical composition, crystal structure and physical (including optical) properties as a diamond.” (ISO 18323)

3.4 The “source” of natural diamonds includes the Supplier of:

- rough – direct producer

[2] https://www.iso.org/obp/ui/#iso:std:iso:18323:ed-1:v1:en

- rough – secondary market/open market
- polished – various suppliers
- repurposed or post-consumer goods and repairs
- pre-owned products
- finished natural diamond jewelry and other products including watches

3.5 “Identified and verified” sources include:

- Identified producers (mining companies) which are independently certified under separate, relevant international standards (such as the RJC Code of Practices) and publish an annual report.
- Smaller industrial or artisanal producers that provide information about the original source of the diamonds and the standards of their operations, verified by reasonable due diligence such as the OECD DDG.
- Secondary market rough suppliers that provide information about the sources of their rough as far as possible.
- Polished Suppliers who manufacture in facilities under their direct control or using identified subcontractors.
- Jewellery manufacturers or wholesalers.
- Suppliers of repurposed or post-consumer natural diamonds or repurposed or post-consumer natural diamond jewellery.

3.6 The separate relevant international standards referred to in 3.5 include environmental management certifications such as ISO 14001 (and/or equivalents) and social performance certifications such as SA 8000 (and/or equivalents).

3.7 Continuous improvement is defined for the purposes of the Natural Diamond Appendix of the SRSP as follows. All Signet Suppliers must have:

- a policy statement to the effect that they will seek as much information as possible about the original sources of the natural diamonds they supply to Signet. This policy statement should include:
  - an objective of achieving full transparency through their supply chains over a set period of time, and
  - measurable targets on an annual basis

- a standard Terms of Business agreement with all their natural diamond suppliers which shall include the requirements of the SRSP.

- the standard Terms of Business agreement must include a clause to the effect that their suppliers shall provide as much information as possible about the original sources of natural diamonds they supply and develop similar objectives to increase the information available over the same time periods.

Suppliers should be able to demonstrate how they are measuring improvement against the targets they have set and some improvement in the percentage of natural diamonds from original sources which they supply to Signet, as a percentage of the total dollar value of all natural diamonds they supply to Signet, on an annual comparative basis

4. SRSP Categories

Signet suppliers must identify all the natural diamonds they supply to Signet by reference to any or all of the Categories set out below.

- Category 1. Single Stone Tracking: Individual natural diamonds supplied by or sourced from identified diamond producers (mining companies) which are independently certified under separate, relevant international standards (such as the RJC Code of Practices). All natural diamonds in this category should be identifiable as being sourced from the producer/mining company.

- Category 2. Parcel Tracking: Parcels of natural diamonds supplied by or sourced from identified diamond producers which are independently certified under separate, relevant international standards (such as the RJC Code of Practices). All parcels of natural diamonds in this category should be identifiable as being sourced from the producers/mining companies.

- Category 3. Mixed Sources: This category allows for the mixing of natural diamonds deriving from a number of different sources, with some percentage of the diamonds deriving from identified and verified sources.

- Category 4. Other Identified and Verified Sources: This category applies to natural diamonds which derive from small-scale or artisanal producers. All diamonds in this category should be identifiable as being sourced from small-scale or artisanal producers.

5 Evidence of Compliance

5.1 All categories must be evidenced by a documented inventory management system and transaction documents.

Categories 1 and 2:

- Inventory records, transaction documents.

Category 3:

- Additional statements identifying provenance should be obtained where possible, and records maintained.
- Documented evidence of management processes designed to deliver continuous improvement over time.
- Where the sources are retail returns, repairs, or repurposed or post-consumer natural diamonds and other used sources, records must be maintained which state the source.

Category 4:

- Where the rough is derived from several sources, such as smaller mines and artisanal sources, evidence of each source must be maintained where available, as well as information

about the relevant warranty/certification – for example, RJC Certification, KP Certificates, DDI's Maendeleo Diamond Standards™.

- Documented evidence of management processes designed to deliver continuous improvement over time.

6 Disclosure

6.1 Suppliers must have clear written policies and procedures to ensure that natural diamonds, laboratory-grown diamonds, treated diamonds, and diamond simulants are fully, proactively and conspicuously disclosed at all times.

6.2 The policies and procedures must cover all relevant contracts, certificates and records of workers involved in the buying and selling of diamonds.

6.3 Full disclosure is the complete and total release of material information about diamonds and the material steps the diamonds have undergone prior to sale. The Supplier must make all reasonable efforts to ensure that this information is disclosed at all times during the selling process. Full disclosure of all material facts must take place whether or not the information is specifically requested and regardless of the effect on the value of the diamonds being sold.

6.4 The disclosure policy must be comprised of the following:

6.4.1 A statement that all relevant information will be verbally disclosed prior to completion of sale.

6.4.2 A statement that all relevant information will be conspicuously disclosed on receipts/bills of sale in plain language, readily understandable to the customer.

6.4.3 A statement that disclosure will immediately precede or succeed the description of the stone or parcel and be equally conspicuous to that description.

6.4.4 A statement that this policy applies to the selling, advertising and distributing of any natural diamond, laboratory-grown diamond, treated diamond, or diamond simulant.

6.4.5 A statement that there will be no attempt to mislead customers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the stones.

7 Intellectual Property

7.1 Signet requires all Suppliers who supply loose natural diamonds or natural diamond jewelry to take substantive and documented action to avoid the inclusion of diamonds that infringe[3] on the intellectual property rights[4] of third parties in parcels or finished jewelry provided to Signet. To that end, Suppliers who supply loose natural diamonds or natural diamond jewelry must:

[3] "Infringe" in the context of intellectual property rights is the improper use or copying of a patent, invention, design, writing, graphic, copyright, trade dress or trademark without permission.

[4] "Intellectual Property Rights" are the rights given to persons over the creations of their minds (such as copyrights, trademarks, patents, trade secrets, technology, and the like). They usually give the creator an exclusive right over the use of his/her creation for a certain period of time.

7.1.1. Document with drawings, descriptions, images, or other records the facet placement, size, and shape of each cut of natural diamond they manufacture or purchase from their suppliers.

7.1.2. Document with receipts, license agreements or other records the companies or persons that have sold or licensed to Suppliers, any designs for loose natural diamonds or natural diamond jewelry Suppliers supply to Signet, or services, machines, equipment, tools, software, or technology valued at more than $200.00 USD that they use in natural diamond manufacturing[5];

7.1.3 Obtain a written warranty or representation in each contract with their suppliers of polished diamonds that the diamonds supplied to them do not infringe on the intellectual property rights of any third party and were not manufactured using processes, machines, equipment, tools, software, or technology that infringe on the intellectual property rights of any third party;

7.1.4. Obtain a written warranty or representation in each contract with their suppliers of natural diamond manufacturing services, machines, equipment, tools, software or technology stating that those services, machines, equipment, tools, software, or technology do not infringe on the intellectual property rights of any third party.

[5] "Natural Diamond Manufacturing" is the process of transforming rough natural diamonds into polished natural diamonds and includes all parts of the process comprising of (but not necessarily limited to) scanning, windowing, mapping, planning or marking the rough natural diamonds, cleaving, sawing, laser cutting, shaping, bruting, coning, treating, faceting, brillianteering and polishing.

SRSP SILVER/PGM APPENDIX:

SRSP COMPLIANCE REQUIREMENTS FOR SILVER AND PLATINUM GROUP METALS ("PGMs"; platinum, ruthenium, rhodium, palladium, osmium and **iridium)**

The requirements in the SRSP apply to all silver and PGMs products (finished and components), and to all products containing silver and PGMs (including solder, plating and flashing, for example, rhodium flashing on silver or white gold).

Suppliers are required to undertake due diligence on all sources of supply of silver and PGMs, even if the quantity of these materials are small. There is no "de minimis"/minimum level of supply, so for such small volumes (e.g. of plated materials, repair solders), suppliers are required at a minimum to ask subcontractors to verify their sources of silver and PGMS, and this inquiry should be documented.

Suppliers are required to certify the silver and PGMs supplied to Signet, either by certification of all silver and PGMs manufacture and supply, or, if this is not possible, by segregating manufacture and supply of silver and PGMs to Signet from manufacture and supply of silver and PGMs to other customers.

The SRSP identifies the requirements for conflict-free silver and PGMs at all levels in the supply chain, as below:

Signet has halted all trade in precious metals that originate from sanctioned Russian sources and suppliers are required not to supply the same to Signet even though the country(s) in which you operate may not have imposed sanctions on Russian precious metals.

By including the existing Signet SRSP warranty statement on each invoice that accompanies product to Signet, you are certifying that no precious metals (silver or PGMs) of Russian origin purchased after February 24, 2022 are included. This policy will remain in effect until an international consensus is reached that the human right violations have ceased, and Signet notifies you of the same.

1: Refineries

The SRSP only accepts silver and PGMs from Refinery sources as follows:

- Silver and PGMs refiners which are certified or due to be certified for calendar year 2018 under the LBMA Responsible Sourcing programme including for silver and on the LBMA good delivery list, (see https://www.lbma.org.uk/good-delivery/silver-current-list#-). Where these refineries also refine PGMs, it can be assumed that the LBMA standards also apply to these metals.

or

- Silver and PGMs refiners which certify and independently audit that all silver and PGMs supplies are responsibly sourced and "conflict-free", in accordance with one of the following guidelines/standards:

  i. The MKS PAMP Group Responsible Precious Metals Guidance for silver and PGMs

  ii. RJC Chain of Custody Standard for Precious Metals
     - (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COC-Standard-24-12-10.pdf)

  iii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
     - (see https://www.oecd.org/, search "conflict minerals")

- Silver and/or PGMs refiner which are certified under SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)

or

- Silver and PGMs which is certified as repurposed from previously manufactured sources (see "Repurposed Silver", section 5 below), from a refiner which certifies these repurposed sources and which has public "Know Your Counterparty" procedures in place.

2: Banks

The SRSP only accepts silver and PGMs from Banks as follows:

- Banks which certify and independently audit that all silver and PGMs is supplied from refineries which fulfill the SRSP criteria under "Refineries" as above.

or

- Banks which certify and independently audit that all silver and PGMs supplies are conflict-free, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3: Precious Metals Trading Companies/Alloy/Solder/Plating Solutions Suppliers

The SRSP only accepts silver and PGMs from Precious Metals Trading Companies, Alloy Suppliers, Solder Suppliers and Suppliers of Plating Solutions as follows:

- Companies which certify and can demonstrate an independent audit that all silver and PGMs is supplied from refineries and/or banks which fulfill the SRSP criteria under "Refineries" and "Banks" as above.

- Companies which certify and independently audit that all silver and PGMs supplies are conflict-free, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas.

- SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)

4: Subcontractors of Component Parts or Finished Products

Note: In accordance with Signet's Supplier Code of Conduct, the same obligations and criteria will apply to subcontractors as apply to Signet's direct suppliers. Suppliers will therefore need to pass on the requirements of the SRSP to all subcontractors.

SRSP only accepts silver and PGMs from Subcontractors of Component Parts or Finished Products as follows:

- Subcontractors which certify and independently audit that all silver and/or PGMs are supplied from refineries, banks and/or precious metals trading companies which fulfill the SRSP criteria under "Refineries", "Banks" and "Precious Metals Trading Companies" as above, and repurposed
- silver and PGMs as below.

or

- Subcontractors which certify and independently audit that all silver and PGMs supplies are responsibly sourced and "conflict-free", in accordance with one of the following guidelines/standards:

    i. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (see https://www.oecd.org/, search "conflict minerals")

    - SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)

5: Repurposed Silver and PGMs

The SRSP only accepts repurposed consumer silver and PGMs as follows:

- Suppliers which certify and independently audit that all scrap and repurposed silver and PGMs are identifiable as its own production and supply, i.e. that the scrap silver and PGMs are:

    i. Returned product from customers
    ii. Pre-owned products
    iii. Faulty inventory
    iv. Scrap and waste silver arising during manufacturing

or

- Suppliers which certify and independently audit that all repurposed silver and PGMs are acquired according to Know Your Customer/Counterparty principles ("KYC"), which require businesses to establish the identity of all organisations with which they deal, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious. KYC procedures may include:

    i. Collection and analysis of basic identity information.
    ii. Identification of ultimate beneficial owner.
    iii. Name matching against lists of known parties.
    iv. Determination of the supplier's risk in terms of propensity to supply silver from an area of conflict.
    v. Assurances on human rights and labor practices.
    vi. An expectation of a customer's transactional behavior.
    vii. Monitoring of a customer's transactions against their expected behavior and recorded profile.

or

- Companies which certify and independently audit that all silver and PGMs supplies including
- sources are responsibly sourced and "conflict-free", in accordance with one of the following guidelines/standards:

    i. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (see https://www.oecd.org/, search "conflict minerals")
    ii. LBMA Responsible Silver Guidance for silver from refiners on the LBMA good delivery list (see https://www.lbma.org.uk/good-delivery/silver-current-list#-)
    iii. The MKS PAMP Group Responsible Precious Metals Guidance for silver
    iv. SCS Global Services' "Responsible Source" Standard for Precious Metals (https://www.scsglobalservices.com/certified-responsible-source-jewelry)

6: "Grandfathered" Silver and PGMs

The SRSP accepts silver and PGMs in any form from any of the sources listed above, which is them held by suppliers, banks, refiners, metals trading companies, scrap suppliers or subcontractors and which has a verifiable date prior to **January 1, 2018**.

A verifiable date is one which can be verified through inspection of physical date stamps on products such as silver and/or PGM bars, jewellery hallmarks and/or auditable inventory lists which are specific to the individual item of silver or PGMs, the component, subcomponent or finished item of jewelry.

7: Exceptions

Exceptions to the SRSP standards listed above may be made on a case-by-case basis. In all such cases, suppliers will be expected to identify and certify the sources of silver and PGMs, preferably to the refinery, and validate why these sources should be determined as conflict-free and otherwise compliant with the SRSP for silver and PGMs. All exceptions must be confirmed in advance and in writing by Signet, and an external assessment and/or independent audit of this validation may be required.

SRSP COLORED GEMSTONES APPENDIX:

SRSP COMPLIANCE REQUIREMENTS FOR NATURAL COLORED GEMSTONES

1. Introduction

The SRSP is designed to ensure that all Signet jewelry materials are responsibly sourced. This SRSP appendix builds upon the Signet Responsible Sourcing program to include natural gemstones from the corundum and beryl families: ruby, sapphire and emerald.

The SRSP is risk-based and requires Signet Suppliers to use due diligence to identify and mitigate risks which may be found in their supply chain. The primary risks relate to country of origin, labor practices and undisclosed treatments.

Some gemstones are associated with human rights violations or conflict[6], and there are legal importation restrictions applicable to gemstones from certain countries. Therefore, Signet requires that Suppliers:

- maintain records documenting the original source (producer company, mining region, and country of origin) wherever this information is available; and
- have written policies requiring original source information from their suppliers wherever this information is available.

Disclosure of treatments is also a fundamental requirement of the SRSP. While treatments are widely used in the gemstone industry and many are regarded as normal practice, this fact does not absolve the gemstone trade from their responsibility to disclose. This responsibility is especially important where treatments may affect the value or durability of a gemstone.

Signet has halted all trade in colored gemstones that originate from sanctioned Russian sources and suppliers are required not to supply the same to Signet even though the country(s) in which you operate may not have imposed sanctions on Russian precious metals and diamonds.

By including the existing Signet SRSP warranty statement on each invoice that accompanies product to Signet, you are certifying that no precious metals or diamonds (natural or lab grown) and/or colored gemstones of Russian origin purchased after February 24, 2022, are included. This policy will remain in effect until an international consensus is reached that the human right violations have ceased, and Signet notifies you of the same.

2. Scope

The SRSP applies to all-natural ruby, sapphire and emerald gemstones supplied to Signet. The scope of the SRSP may be expanded to include other natural gemstones in the future, following Signet's risk-based approach. The SRSP also includes disclosure requirements for laboratory-grown/created gemstones (LGGs).

3. Requirements

3.1 Suppliers must ensure that natural gemstones supplied to any Signet division are always accurately described to the buyer and in associated documentation (See also 3.7).

[6] See OECD Due Diligence Guidance.

3.2 Suppliers must ensure that natural gemstones are always segregated from LGGs.

3.3 Suppliers of natural gemstones must undertake testing to ensure the stones are natural and to detect treatments, prior to supplying Signet. Suppliers must have written testing protocols and maintain test records.

3.4 Where Suppliers use a sample testing approach, testing must be undertaken on an Average Quality Limit (AQL) basis (reference ISO 2859-1), and must be performed by qualified gemological personnel, in-house or outsourced to a gemological laboratory. Signet does not specify testing equipment for colored gemstones, providing all testing is done by qualified gemological personnel.

3.5 All Suppliers must employ a documented inventory management system which documents their chain of gemstone ownership and can be verified by audit.

3.6 In accordance with Signet's Supplier Code of Conduct, the same obligations and criteria that apply to Signet's direct suppliers will also apply to subcontractors. Suppliers will therefore need to pass on the requirements of this document to all subcontractors.

3.7 All Suppliers must always disclose all treatments

3.8 All Suppliers must disclose that a gemstone is laboratory grown/created, manufactured or composite product.

3.9 Suppliers should apply the treatments nomenclature set out in the **American Gem Trade Association Gemstone Information Manual (16th Edition)**, (see https://agta.org/wp-content/uploads/2025/03/16thEditionGemstoneInformationManual20025.pdf)

3.10 Suppliers should comply with the **US Federal Trade Commission Jewelry Guides (2018 Edition)**, available here.

3.11 Signet will not accept any gemstones mined in Myanmar/Burma. Suppliers must take robust and documented action to ensure that no material mined in Myanmar is supplied to Signet. As a minimum Suppliers must communicate this requirement in writing to their suppliers.

4. Minimum Compliance

4.1 Suppliers must evidence compliance across all Categories (Clause 6) as follows:

4.1.1 An inventory management system

4.1.2 Sale & purchase documents

4.1.3 Documented KYC due diligence system

4.1.4 A written policy statement and standard terms of business with all suppliers (See also 5.4)

5. Definitions

5.1 The SRSP adopts the definitions of gemstones, artificial products and treatments in the CIBJO Gemstone Book. See in particular Sections 4 and 5.

5.2 The "source of gemstones includes:

- rough – direct producer
- rough – secondary market/open market
- polished – various suppliers
- repurposed goods and repairs
- pre-owned products
- finished gemstone jewelry and other products including watches

5.3 "Identified and verified" sources include:

- Industrial or artisanal producers that provide information about the original source of gemstones and the standards of their operations.
- "Original Source" means the mine and/or country of origin.
- Secondary market rough or polished gemstone suppliers that provide information about original sources as far as possible.
- Polished suppliers who manufacture in facilities under their direct control or outsourced to identified subcontractors.
- Suppliers of repurposed and/or pre-owned gemstones.

5.4 Management systems designed to deliver continuous improvement will be evidenced by a policy statement contained in the standard Terms of Business agreement between a Signet Supplier and their suppliers. The policy statement should state among other things, that all treatments must be fully disclosed to the Supplier and the original sources of colored gemstones must be disclosed to the Signet Supplier wherever possible

6. Categories

Signet suppliers must identify all natural colored gemstones they supply to Signet by reference to any or all of the Categories set out below.

- Category 1. Single Stone Tracking or Parcel Tracking: Individual gemstones or parcels of gemstones supplied by or sourced from "identified and verified sources" as defined in 5.3. Repurposed gemstones should be included here.

- Category 2. Mixed Sources: This category allows for the mixing of gemstones deriving from a number of different or unidentified sources, with some percentage of the gemstones deriving from original sources.

SRSP LABORATORY GROWN DIAMOND APPENDIX:

SRSP COMPLIANCE REQUIREMENTS FOR LABORATORY GROWN DIAMONDS

1. General Principles

The SRSP is designed to ensure that all Signet jewelry materials are responsibly sourced. This Appendix establishes requirements specific to laboratory grown/created diamonds (LGDs). However, it must be read in association with the entire SRSP.

While other SRSP Appendices focus on the sources of materials and ensuring that materials are conflict-free, LGDs are an entirely manufactured product. Therefore, the risk profile of LGDs primarily relates to factory standards, assurance that the product is in fact LGD, and accurate disclosure.

2. Scope

The LGD Appendix applies to all LGDs supplied to Signet including loose polished LGDs and LGDs set into finished jewelry, including any diamonds or composite (assembled) stones containing LGD or having a coating with LGD material.

3. Requirements

3.1 LGDs are manufactured using two technologies: Chemical Vapor Deposition (CVD) and High-Pressure High-Temperature (HPHT). Suppliers must ensure that factory standards take account of the risks of the manufacturing process and should comprise of (but not necessarily be limited to) the following:

3.1.1. Factory staff are fully trained in the safe use of all equipment, which training must be regularly updated.

3.1.2 If applicable, any appropriate personal protective equipment (PPE) must be provided to all staff and worn at all times when staff are operating or in the proximity of applicable machinery.

3.1.3 If applicable and appropriate per 3.1.2, the wearing of PPE must be monitored and enforced, and replacement PPE issued promptly when necessary.

3.1.4 LGD production facilities must provide safe and healthy working conditions for all employees in accordance with applicable law and other relevant industry standards. LGD production facilities should be certified under appropriate occupational health and safety management system standards, such as ISO 45001 or equivalent.

3.1.5 Factories for cutting and polishing LGDs must meet the same standards as for natural diamonds.

3.2 Where a Supplier deals in natural diamonds and LGDs, the Supplier must have clear policies and procedures and take all precautions to ensure that LGDs are segregated from natural diamond production/polishing/jewelry manufacture/trading and/or any other relevant process in the pipeline at all times. Policies, procedures and training must make specific provision for this risk.

3.2.1 Suppliers must have procedures to ensure that natural diamonds and/or diamond simulants cannot become mixed with their LGD supply chain.

3.2.2 Suppliers must clearly disclose whether the LGDs are created using Chemical Vapor Deposition (CVD) or High-Pressure High-Temperature (HPHT), and keep LGDs produced using these technologies segregated.

3.2.3 Suppliers must implement appropriate training for staff involved in handling, movement or security of product.

3.2.4 These requirements should also be implemented in accordance with Clause 8 - Disclosure.

4. Testing of LGDs

4.1 Suppliers of LGDs must undertake testing to ensure all stones are in fact LGDs and that parcels do not contain natural diamond, diamond simulants and/or any material which is not laboratory-grown diamond. Suppliers must have written test protocols and maintain test records.

4.2 Suppliers may test on a sample basis, using an Average Quality Limit (AQL) basis (reference ISO 2859-1). Testing must be performed by qualified gemological personnel, in-house or outsourced to a gemological laboratory.

4.3 Suppliers are not required to test LGDs only if they meet the following criteria:

- are a manufacturer of LGDs
- cut/polish LGDs
- do not deal in natural diamonds or diamond simulants

Further guidance on testing and disclosure of LGDs can be found at De Beers Group "Best Practice Principles Disclosure Practice Note" (see https://www.debeersgroup.com/sustainability-and-ethics/leading-ethical-practices-across-the-industry/best-practice-principles-assurance-programme)

5. Disclosure & Nomenclature

5.1 Suppliers should follow the US Federal Trade Commission Jewelry Guides (2018 Revision) as a general rule.

5.2 LGDs must always be accurately described and clearly differentiated from natural diamonds and from non-diamond (diamond simulant) materials such as Cubic Zirconia or Moissanite.

5.3 Suppliers must have clear written policies and procedures to ensure that LGDs are fully and accurately described. All actors in the jewelry supply chain have a shared responsibility to protect the reputation of jewelry and build positive perceptions about jewelry, especially in the consumer sphere.

5.4 Neutral language should always be used by suppliers to Signet to describe LGDs. Therefore, the phrases "laboratory-grown", "laboratory-created", "[manufacturer name]-created" should be employed. The word "synthetic" should be avoided as a descriptor for LGDs because in common usage it can have a pejorative connotation and may be inferred to mean "fake".

5.5 Suppliers must take special care with the language used to describe LGDs. Pejorative language about natural diamonds should not be used, especially in association with claims to the effect that LGDs are more ethical or environmentally friendly than natural diamonds.

5.6 The policies and procedures must cover all relevant contracts, certificates and records of workers involved in the buying and selling of diamonds.

5.7 Suppliers should have a full disclosure policy relating to the supply of LGDs to Signet: full disclosure is the complete and total release of all material information about LGDs and the material steps the LGDs have undergone prior to sale. The Supplier must make all reasonable efforts to ensure that this information is disclosed at all times during the selling process. Full disclosure of all material facts must

take place whether or not the information is specifically requested and regardless of the effect on the value of the LGDs being sold.

5.8 The disclosure policy must comprise of the following:

5.8.1 A statement that all relevant information will be disclosed (either verbally or in writing) prior to completion of sale.

5.8.2 A statement that any relevant disclosure will immediately precede or succeed the description of the stone or parcel and be equally conspicuous to that description.

5.8.3 A statement that this policy applies to the selling, advertising and distributing of any LGDs.

5.8.4 A statement that there will be no attempt to mislead customers through illustrations, descriptions, expressions, words, figures, depictions or symbols relating to the LGDs.

5.8.5 Disclosure statements for LGDs are not required in the Warranty Statements for LGDs (see below).

6. Evidence of Compliance

6.1 Suppliers must maintain copies of their policy statements, disclosure statements, terms of business and transaction documents which may be necessary to evidence compliance with the SRSP.

Consequential SRSP Amendments for LGDs

Warranty Statements

For suppliers of LGDs, it is necessary to distinguish a warranty statement for LGDs in addition to the existing SRSP and natural diamond warranty statements.

Signet has halted all trade in natural diamonds that originate from sanctioned Russian sources and suppliers are required not to supply the same to Signet even though the country(s) in which you operate may not have imposed sanctions on Russian diamonds.

By including the existing Signet SRSP warranty statement on each invoice that accompanies product to Signet, you are certifying that no diamonds (natural or lab created) of Russian origin purchased after February 24, 2022 are included. This policy will remain in effect until an international consensus is reached that the human right violations have ceased, and Signet notifies you of the same.

Suppliers of <u>laboratory-grown diamonds</u> should include the following warranty statements on all documents:

SRSP Warranty

"The seller warrants that these products have been supplied in compliance with the Signet Responsible Sourcing Protocol ('SRSP')."

Natural Diamond Warranty

"The diamonds herein invoiced have been purchased from legitimate sources not involved in funding conflict, in compliance with United Nations Resolutions and corresponding national laws. The seller

hereby guarantees that these diamonds are conflict free and confirms adherence to the WDC SoW Guidelines."

Laboratory Grown Diamond Warranty (for LGD suppliers only, on all documents)

"Any laboratory-grown diamonds herein supplied comply with the SRSP and are warranted not to include any natural diamonds or any material which is not laboratory-grown diamond."

SRSP HUMAN RIGHTS APPENDIX:

SRSP COMPLIANCE REQUIREMENTS FOR THE RESPECT AND PROTECTION OF HUMAN RIGHTS

The requirements in this Human Rights Appendix apply to all Signet suppliers of jewelry (components and/or finished jewelry).

Universal human rights are often expressed and guaranteed by law, in the forms of treaties, customary international law, general principles and other sources of international law. The most well-known international human rights instrument is the Universal Declaration of Human Rights (UDHR), adopted by the United Nations General Assembly in 1948. The UDHR is considered to be a central component of international customary law, along with the International Covenant on Civil and Political Rights (CCPR) and the International Covenant on Economic, Social and Cultural Rights (CESCR). Together these form the International Bill of Human Rights.

The UN Guiding Principles on Business and Human Rights (also known as the “Ruggie Principles”) were adopted in 2011 and have become the primary reference for the private sector’s responsibility to respect human rights.

The UN Guiding Principles recognise that companies have a responsibility to respect the rights outlined in them. Coupled with these UN instruments, the International Labour Organisation (ILO) has identified fundamental labour principles in its Declaration on Fundamental Principles and Rights at Work. These rights are directly addressed in the RJC Code of Practices in the following provisions: Child Labour, Forced Labour, Freedom of Association and Collective Bargaining and Non-Discrimination.

The Guiding Principles define respecting human rights as:

a. Avoid causing or contributing to (e.g. causing in part) adverse human rights impacts through their own activities, and address such impacts where they occur; and

b. Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

The UN Guiding Principles on Business and Human Rights is the basis for Signet’s policy.

Suppliers shall respect Human Rights and observe the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances, including as a minimum:

1: A policy commitment to respect Human Rights,

The policy statement can be a stand-alone policy or incorporated in the supplier’s general policies and procedures. The policy statement should be:

i. Approved at senior levels of the company
ii. Informed by internal and/or external expertise, as appropriate
iii. Clear on expectations of employees, contractors and business partners
iv. Publicly available and communicated externally
v. Reflected in operational policies and procedures

2: Include measures in the supplier’s due diligence process that seek to identify, prevent, mitigate and account for how they address their impacts on Human Rights,

Human rights due diligence practices:

i. Should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities
ii. Should seek to address adverse human rights impacts which may be directly linked to its operations, products or services by its business relationships
iii. Will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations
iv. Should be regularly updated, for example when starting a significant new activity or business relationship, recognizing that the human rights risks may change over time

3. Where suppliers identify that they have caused or contributed to adverse Human Rights impacts, they shall provide for or cooperate in legitimate processes to enable the remediation of those impacts.

4. Suppliers due diligence on their supply chains should also verify that their own suppliers also follow these minimum Human Rights requirements.

Suppliers' policies and practices relating to the respect and protection of Human Rights should follow the following international standards, recognized by Signet:

1: Social Accountability International's (see https://sa-intl.org/) SA 8000 standard (see https://sa-intl.org/programs/sa8000/ and/or

2: RJC Code of Practices standard's section on Human Rights (see https://www.responsiblejewellery.com/wp-content/uploads/RJC-2024-COP-Standard-1.pdf)