

# Human Rights Policy

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## Our Commitment

Signet Jewelers Limited (“Signet”) is the world’s largest retailer of diamond jewelry. As a purpose-driven and sustainability-focused company, Signet is committed to supporting the dignity, well-being, and human rights of all those affected by our global operations. In furtherance of this commitment, we are a participant in the United Nations Global Compact and adhere to its principles-based approach to responsible business. In line with the UN Sustainable Development Goals, Signet respects access to water and sanitation as human rights.

In compliance with the United Nations Guiding Principles on Business and Human Rights, and the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises, Signet is committed to respecting the internationally recognized human rights as stated in the International Bill of Human Rights. Signet is committed to the protection of women's rights at home, in our offices and support centers, as well as throughout the value chain.

Signet respects human rights throughout its operations by seeking to avoid infringing on human rights and working to address any adverse human rights impacts with which it may be involved and taking adequate measures for their prevention.

Meeting the responsibility to respect human rights is a baseline expectation for all Signet team members, partners, suppliers, contractors, and other parties directly linked to our operations, products or services. More information on our initiatives and general approach to human rights can be found in our annual Corporate Citizenship and Sustainability Report.

## Our Team Members

Our Company provides employment around the world. We intend to foster a culture where diversity, equity and inclusion are a part of our identity, and we are committed to increasing diversity within our Company leadership. As outlined in our Code of Conduct, we provide equal consideration to all applicants and team members and have developed corporate policies such as our Equal Employment Opportunity Policy to underscore the idea that every employee is entitled to be treated with dignity and respect. We help our team members put this idea into practice by requiring an annual training that teaches team members how to recognize, address and overcome the different kinds of bias in the workplace. We value our team members and are continuously working to promote diverse views and opinions, provide opportunities for professional growth and maintain a safe working environment that is free from any form of discrimination or harassment.

## Code of Conduct, Compliance & Training

Across our facilities and stores, we take pride in keeping a work environment that complies with employer responsibility standards. We comply with all applicable national as well as state and local laws regarding wages, benefits and hours worked, and we recognize the rights of workers to make an informed decision as to whether to associate or not with any lawful organization, consistent with applicable laws. We conduct compliance training for executives, managers and team members, and we expect everyone in the Company to follow our Code of Conduct, regardless of rank or position. Team members acknowledge their understanding and commitment to the Code of Conduct yearly, and team members, including management, receive regular training on compliance with anti-bribery/corruption laws and company policies. Signet’s Compliance training is inclusive of human rights training.

## Supply Chain Workers

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## Our Supply Chain

Signet expects all suppliers to respect internationally recognized human rights. Consistent with our high standards for social responsibility, we prohibit the use of modern slavery, human trafficking, and forced adult or child labor of any kind. Signet expects suppliers to adhere to the UN Guiding Principles on Business and Human Rights.

Signet Jewelers administers the Signet Responsible Sourcing Protocol (SRSP) annually to our global third-party merchandise vendors. The SRSP was developed with utmost reverence for human rights. The human rights components and compliance requirements are publicly available on Signet's dedicated responsible sourcing website <https://signetresponsiblesourcing.com/>. The Signet SRSP Audit Guidance document is updated each year and provided to suppliers as part of the SRSP process. Signet conducts its responsible sourcing audit assurance program through the suppliers' certification audit against the Responsible Jewellery Council (RJC) 2019 Code of Practices. The Company acknowledges the salient risks in the mining of diamonds and gemstones as well as in the manufacturing of jewelry. The RJC audit is an effective mechanism to address business risks, including human trafficking and slavery in the jewelry industry. Signet adheres to the Kimberley Process Certification Scheme as part of our global approach to human rights due diligence.

In addition, all Signet suppliers are subject to audit for any reason, at any time. A supplier's RJC certification must include all precious minerals and metals from all manufacturing and office locations. RJC-certified members who achieve and maintain this level of certification are not required to undertake additional third-party audits of SRSP reports and/or ethical audits (i.e., onsite factory 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. Suppliers not in compliance with Signet's SRSP policy or that do not make corrections to audit findings within a reasonable time frame may be suspended from doing business with Signet.

## Disclosure of Key Suppliers

Signet discloses its largest fine jewelry suppliers by revenue in its annual Corporate Citizenship and Sustainability report.

## Implementation

We are committed to conducting ongoing human rights due diligence and to engage with our key stakeholders around the world to continue to improve our approach. We will continue to include human rights as part of our Code of Conduct training and will report on our progress in our Corporate Citizenship and Sustainability Report.

## Stakeholder Grievance Mechanism

Individuals may also report concerns through a confidential ethics helpline, which is operated by an independent third party and available at any time for both internal and external complaints. Any observations or concerns about violations of our policies combating human rights are reportable to our ethics helpline. An independent third party promptly investigates all reported matters and acts as needed, including disclosure to our management team, the Audit Committee of the Board of Directors and governmental authorities as appropriate.

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### Contact Signet

#### Online:

T.I.P.S.: [www.signet.ethicspoint.com](http://www.signet.ethicspoint.com)

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

US and Canada 1-800-984-TIPS (8477)

Israel: 844-431-3618

United Kingdom: 855-838-4705

Ireland: 855-325-1982

Botswana: 833-725-5473

As a member of the RJC, Signet is also subject to the RJC grievance mechanism. The Complaints Mechanism defines how the RJC responds to complaints regarding potential non-conformance with the RJC Certification System.

### Responsible Jewellery Council Members can contact Responsible Jewellery Council

Complaints must be submitted in writing using the RJC complaints form in hard copy addressed to:

Assurance Manager

Responsible Jewellery Council

Second Floor, Quality House, 5-9

Quality Court, Chancery Lane, London WC2A 1HP

by email addressed to: [complaints@responsiblejewellery.com](mailto:complaints@responsiblejewellery.com)

Initial telephone inquiries can be made to seek guidance on the submission of a complaint, this can be done anonymously. – by telephone on +44 (0)207 321 0992

### Corporate Funds

Signet Jewelers does not use corporate funds to make direct campaign contributions or support individual political candidates. Signet and the Signet Love Inspires Foundation do support human rights causes through financial pledges and donations to human rights advocacy groups including 501c3 organizations. Signet has vetting criteria regarding the human rights policy and advocacy of the organizations it supports. Signet discloses contributions to both trade associations and 501c3 organizations in its annual Corporate Citizenship and Sustainability report.

### Changes to this Policy

Signet Jewelers retains the right to modify this Policy at any time without prior notice and requires approval from members of Signet's Leadership Team.