

SIGNET GLOBAL ETHICAL POLICY

At Signet, corporate ethical values are an important element of continuing success in the marketplace. These values – including integrity, leadership, teamwork, and accountability – are vital to the success of the Company. The Company's success is dependent on our reputation with our workers, co-workers, suppliers, customers, and the communities where we work and live.

This Global Ethical Policy has 12 key elements, and it supports our corporate values by providing guidelines to ensure that the Company and its employees respect other workers, workplace safety and hygiene, in every community where the Company is located. Signet expects the same of key suppliers and contractors to our Company.

By our compliance with this Global Ethical Policy, we demonstrate our integrity and leadership within the business community. Further, we improve our ability to attract and retain the best talent and provide better supply chain management and performance.

Signet's Statement of Values

Signet is a values driven company, with a strong commitment to social responsibility and creating a positive societal impact. We like to do good in society and to promote health and wellbeing through our business and clients. This commitment may lead us to respectfully decline to work on projects or with brands that, for example, we consider to conflict with those values, including those that may appear to us as discriminatory, intolerant, blasphemous, violent, vulgar, pornographic, or promoting harmful or addictive illegal substances or tobacco.

Who does this Global Ethical Policy apply to?

This Global Ethical Policy applies to all persons working for us including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and individual temporary or fixed term contractors ("Signet Staff"). We should not engage any contractor, agent, consultant, supplier, client, customer, business partner or any other third party whose business practices conflict with our Global Ethical Policy.

Management of the Policy

- The Company will communicate this Policy to all Signet Staff. Any local policy must be consistent with the requirements set forth in this Policy.
- The management system shall include practices to investigate, address and respond to the concerns of employees with regard to this Policy. The Company shall refrain from disciplining or otherwise discriminating against any employee for providing information in good faith concerning the Company's compliance with this Policy.
- Management will periodically review the adequacy, suitability and continuing effectiveness of the systems implemented to meet the requirements of this Policy. The Company will implement appropriate corrective actions to address any identified material non-conformance.

Suppliers and Contractors

The Company will periodically evaluate select suppliers and contractors on their ability to demonstrate substantial conformance with this Policy, subject to local rules and customs. The Company will maintain evidence that this Policy is substantially being met by suppliers and contractors that have been evaluated, subject to local rules and customs. This evidence may include certification forms, written questionnaires, inspections, or other appropriate documentation.

Signet's 8 Key Ethical Policy Elements

1. Employment is freely chosen, no Forced or Harsh Treatment
2. Worker Feedback
3. Working Conditions and Health & Safety
4. No Child Labour
5. Wages and Benefits
6. Working Hours
7. No Discrimination
8. Regular Employment is Provided
9. Gifts and Hospitality
10. Bribery and Corruption
11. Money Laundering
12. Modern Slavery

1 Employment is freely chosen; no Forced or Harsh Treatment

1.1 The Company does not allow any forced, bonded, or involuntary labour; employment is freely chosen.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice or otherwise in accordance with their contract or local laws.

1.3 The Company will not tolerate any form of servitude, Modern Slavery, Human trafficking, exploitation, or coercion.

1.4 The Company will not tolerate any harsh or inhumane treatment

1.5 Any physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

2 Worker Feedback

2.1 We welcome feedback from all workers, without distinction and a feedback loop is provided freely for all workers to the management through their supervisor or line manager.

2.2 The employer adopts an open attitude towards improvement, but without any element of third-party organisations or bodies.

2.3 Paid time is given for worker groups and teams to consult with the business leadership team, for the purpose of continuous improvement for the business and its workers.

3 Working Conditions and Health & Safety

3.1 A healthy, safe, and hygienic working environment shall be provided, meeting or exceeding the minimum statutory requirements, and the prevailing knowledge of the industry and of any specific hazards. The Company will take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 All workers will receive appropriate training on health, safety and hygiene matters in the workplace. Training will be regular, documented, repeated, and include newly hired and reassigned employees.

3.3 Access to clean toilet facilities and potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Where accommodation is required, the provided facilities will be clean, safe, and exceed the basic needs of the workers.

3.5 Senior management takes full responsibility for health, safety and hygiene in the workplace and its environs.

3.6 The Company will provide adequate means of evacuation and train employees in emergency preparedness.

4 No Child Labour

4.1 There shall be no recruitment, or employment of any kind, of child labour. All workers must meet or exceed the local minimum legal age requirements

4.2 The Company will support, or participate in, and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Depending on the nature of the work being performed (e.g. at night or in hazardous circumstances), the Company may limit employment to workers over 18 years of age.

4.4 These policies and procedures shall conform to the minimum statutory provisions.

5 Wages and Benefits

5.1 The wages paid to all employees will meet, or exceed, the local/national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to provide some discretionary income (i.e. a 'working wage').

5.2 All workers should be provided with written and understandable information about their employment conditions including wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

5.4 Employees must be provided with clear information about their wages and benefits on a regular basis.

6 Working Hours

6.1 The Company will comply with applicable local and national laws and industry standards on working hours, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by the contract, and shall not exceed 48 hours per week. The Company will ensure employees enjoy regular rest breaks, at least meeting all statutory requirements.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.

6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:

this is allowed by national law;

this is allowed by a management decision following consultation with a representation of the workforce;

appropriate safeguards are taken to protect the workers' health and safety; and

the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.

6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

7 No Discrimination

7.1 The Company will not allow discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, caste, national origin, religion or belief, age, sex, disability, gender reassignment, marital or civil partnership status, sexual orientation, pregnancy, or maternity.

7.2 The Company respects employees' observance of tenets and practices relating to race, national origin, caste, sexual orientation, religion, age, gender, disability.

7.3 The Company prohibits unwanted behaviour, including gestures, language and physical contact, that is sexually or otherwise coercive, threatening, abusive or exploitative. These abuses include but are not limited to, sexual harassment, bullying, corporal punishment, mental or physical coercion and physical abuse.

8 Regular Employment is Provided

8.1 To every extent possible work performed must be on the basis of a recognised employment contract established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9 Gifts and Hospitality

9.1 In no circumstances should any employee offer, give or accept any gift or hospitality, regardless of value, which might be construed as influencing a business decision. If you are unsure whether to offer or accept a gift, please discuss this with your line manager.

9.2 If a gift is offered or received, you must inform your line manager who will maintain a record.

10 Bribery and Corruption

10.1 Bribery is the giving or receiving of a gift, payment or other benefit, in order to obtain a commercial advantage. A bribe need not actually be paid – it is sufficient that it is asked for or offered.

10.2 Bribery or corruption in any form is unacceptable and we are committed to transparency in all our business dealings. Most countries have laws that prohibit corruption and Signet is subject to the UK's Bribery Act 2010 which prohibits any form of bribes or "grease" payments to government officials of any kind.

10.3 You should always abide by the following basic rules irrespective of who you are dealing with:

a) never offer or make any unauthorised payments;

b) never attempt to induce anyone to do something illegal or improper;

c) always report any suspicions or knowledge of improper payments being offered or received to your line manager; and

d) never offer or accept money (or anything of value), gifts or kickbacks, for obtaining contracts or business

11 Money Laundering

Money laundering is the process by which criminals attempt to hide and disguise the true origin and ownership of money gained through criminal activities and can also refer to the financing of terrorism. Money may be filtered through a series of transactions in order to "clean" it and give it the appearance of being from legitimate sources.

11.1 Everyone is expected to comply with money laundering and tax evasion prevention laws.

11.2 The Company will not accept payment for goods or services performed under contract from our clients in cash, travellers cheques, third party payments or money orders.

11.3 Any payment that the Company makes to a supplier or other third party must also be made to a bank account titled in the name of the contracted third party.

12 Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and

enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

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