

Signet Responsible Sourcing Protocol (“SRSP”) for conflict-free tin, tungsten and tantalum.

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Background

This document outlines the procedures which are required by Signet Jewelers and all Signet business units in the USA, UK and Canada (“Signet”) for its suppliers, to ensure that supplies of all products including tin, tungsten and tantalum (“3Ts”) are conflict-free, such that Signet will comply with the “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.

This document forms part of the Signet Responsible Sourcing Protocol (“SRSP”) as it refers to supplies of tin, tungsten and tantalum from areas of conflict: it is intended for use by all suppliers and was effective 1st January 2013 as Signet company policy for all Signet business units in the USA, UK and Canada. All suppliers are expected to implement the SRSP and to be fully compliant with the SRSP.

Core Assumptions

The SRSP for the 3Ts makes the following core assumptions:

1. The Dodd-Frank Act final rules were confirmed by the SEC on 22nd August 2012 (see www.sec.gov/news/press/2012/2012-163.htm), based significantly on the “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” issued by the Organisation for Economic Cooperation and Development (“OECD”). The main focus in the OECD guidance is an ability to identify the refinery or smelter source of tin, tungsten or tantalum used in production of jewellery and other products.
2. In accordance with Signet’s Supplier Code of Conduct, suppliers will need to pass on the same Signet Responsible Sourcing Protocol (“SRSP”) requirements to all subcontractors, who will in turn need to assess this SRSP, ensure due diligence is undertaken on their own supply chain, and confirm a capability to certify and independently audit against the SRSP.
3. The SRSP recognizes several global industry guidance and standards as applicable to the SRSP, and identifies these at relevant points in the supply chain, especially refineries and smelters.
4. In particular, the SRSP recognizes and supports the following:
 - a: The SRSP recognizes the Organisation for Economic Cooperation and Development’s (OECD) Due Diligence Guidance Supplement for Tin, Tantalum and Tungsten as a core reference, specifically “downstream companies should aim to identify the mineral smelters/refiners that produce the refined metals used in their supply chain”. See www.oecd.org/fr/daf/inv/mne/mining.htm
 - b: The Electronic Industry Citizenship Coalition (EICC) Conflict-Free Smelter Initiative (“CFSI”), a voluntary program in which an independent third party evaluates a smelter’s procurement activities and determines if the smelter demonstrated that all the materials they processed originated from conflict-free sources (see www.conflictreesmelter.org/cfshome.htm)
5. Additional certification to the international guidance and standards set out in the SRSP may be available in individual countries and in individual circumstances, which the SRSP may recognize. Any additional certification will be assessed and confirmed on a case-by-case basis by Signet. Suppliers requesting such certification must in all cases be able to identify and certify the sources of

3Ts, preferably to the refinery/smelter, and validate why these sources should be determined as conflict-free. An external audit of this validation may be required.

6. Signet's suppliers will be required to define in detail which criteria are being used to certify all 3Ts supplies as compliant with the SRSP, and will remain responsible and accountable for certification and external audit of supplies to Signet, based on this SRSP.
7. 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. The declaration must state: *"The seller warrants that any products containing gold, tin, tungsten or tantalum have been supplied in compliance with the Signet Responsible Sourcing Protocol ("SRSP")"*.
8. All new suppliers to Signet will be expected to certify all supplies of products containing tin, tungsten or tantalum, with the exception of watches, are in compliance with the SRSP before any commercial activity related to supply of products containing 3Ts between the companies begins.
9. All suppliers are required to report compliance with the SRSP annually through an online compliance report provided by Signet: 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").

SRSP Requirements for Conflict-Free Tin, Tungsten and Tantalum ("3Ts"):

The Signet Responsible Sourcing Protocol ("SRSP") is a guide for Signet's suppliers to ensure that all products provided to Signet which include tin, tungsten or tantalum are conflict-free. The requirements in the SRSP apply to all products (finished and components), and to all products containing any of the 3Ts, with the exception of watches.

Suppliers are required to certify the products supplied to Signet, 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 CFSI conflict-smelter list (see www.conflictreesourcing.org/conflict-free-smelter-refiner-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" (see www.cccmc.org.cn).
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 fulfil 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.