



SIGNET
JEWELERS

Code of Conduct

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Contents

01	<u>Letter from Our CEO</u>	pg. 3
02	<u>Principles for the Code of Conduct</u>	pg. 4
03	<u>Love for Our Team</u>	pg. 5-9
	Why do we have a Code?	pg. 5
	Maintaining a Positive Employee Experience	pg. 5
	Lead Bravely, with Integrity	pg. 6
	Diversity, Equity and Inclusion	pg. 6
	Discrimination and Harassment	pg. 7
	Health and Safety	pg. 8
	Speak Up and Report Concerns	pg. 8
	People First - No Retaliation	pg. 9
	Consequences For Violating the Code	pg. 9
04	<u>Love for All People</u>	pg. 10-16
	Sales And Marketing Practices – It’s About CUSTOMERS!	pg. 11
	Competition and Antitrust	pg. 11
	Anti-Corruption and Anti-Bribery	pg. 11
	Gifts and Entertainment	pg. 12
	Conflicts of Interest	pg. 12-13
	Using Social Media	pg. 13
	Safeguarding Data	pg. 14
	Insider Trading	pg. 15
	Anti-Money Laundering	pg. 16
	Human Rights	pg. 16
05	<u>Love for our Planet and Products</u>	pg. 17-21
	Product Excellence	pg. 18
	Responsible Sourcing	pg. 18
	International Trade Controls & Boycotts	pg. 18
	Third Party Compliance	pg. 19
	Protecting Company Assets	pg. 19
	Accurate Records	pg. 20
	Record Retention	pg. 20
	Fraud	pg. 21
	Political Contributions and Involvement	pg. 21
	Audits And Investigations	pg. 21
06	<u>Reporting Resources and Disclosure Process</u>	pg. 22-23

Letter from Our CEO

Dear Signet Team,

As a purpose-inspired and values-driven company, we believe that it's not just what we do, but how we do it that truly matters. In this spirit, it's important for each of us to take time every year to review and recommit ourselves to Signet's Code of Conduct. This re-commitment is an essential part of fulfilling our purpose and our responsibilities to one another, our business partners, and our shareholders.

Signet's Purpose – Inspiring Love — is central to our success because it motivates the performance of our organization, attracts top talent to our company, and earns us the respect, admiration, and lifetime loyalty of our customers. It's fundamental to how we help all people celebrate life and express love through our products and services.

Our Code of Conduct helps ensure ethical, responsible behavior in every aspect of our business, without exception. This Code defines our expectations for team members' actions and interactions with one another and provides a comprehensive set of tools to help us remain legally compliant and ethically sound as we strive to achieve our organization's growth goals.

Please take the time to review and internalize this Code of Conduct. Our future as an innovative, trusted, and admired company depends on our integrity and behavior. If you have any questions or want to report a concern, I strongly encourage you to contact your manager or a member of our Human Resources, Ethics & Compliance, or Legal teams.

Thank you for all you do to strengthen the reputation of our company and to ensure Signet is a great place to work for every member of our team and for everyone who has a stake in Signet's success.

Virginia C. Drosos
Chief Executive Officer



CEO Gina Drosos (standing, center right) with members of the Board

2

Principles for the Code of Conduct

Signet Jewelers (“Signet”) is dedicated to being a highly transparent and collaborative workplace where open and honest dialogue at all levels is welcomed. We recognize a diverse and inclusive workforce is critical to our success and is our most valuable asset.

The expected conduct outlined in this Code of Conduct (“Code”) applies to ALL team members, from the Board of Directors (“Board”) to individual contributors. All team members and third parties are expected to act with honesty and integrity and conduct business with Signet’s and our customers’ best interests in mind. A single ethical violation, real or perceived, can overshadow the great work we do.

The Ethics & Compliance Department (“E&C”) is responsible for maintaining and updating this Code; it is approved by the Board with each revision. Unless another policy specifically states otherwise, this Code prevails in any conflict between it and other Company policies or procedures. All policies referenced in this Code are

available on the SIGnet. Team members may communicate questions or concerns regarding violations of the Code or any corporate policy to the reporting resources referenced in section 6; Signet safeguards those who do.

All Signet team members are required to acknowledge the Code as part of their onboarding experience and as part of the annual Code training.



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There can be this perception that Compliance creates roadblocks to success. But did you know the World’s Most Ethical Companies historically outperform their peers and competitors financially?

“Doing the right thing when no one is watching” helps fulfill our Purpose, and we can be more profitable for doing so!

Ebony Yeboah-Amankwah
VP Compliance & Ethics, AGC

”



Love for Our Team

Why do we have a Code?

At Signet, our Purpose of Inspiring Love requires more from us than just following the law. It requires that we conduct ourselves with honesty and integrity at all levels of the organization.

We require the same of anyone whom we entrust to conduct business on our behalf or from whom we obtain products or services.

Our Code is designed to:

- ◆ Make sure we proactively address issues that arise that do not further our purpose and subjects us to risks of non-compliance.
- ◆ Provide a single resource for team members to review the ethical standards expected of them, answer questions they may have, and provide them with the tools needed to help report issues they may witness or believe to have occurred.



For more details, see the [Open-Door Communication & Take It Personally, Signet \(T.I.P.S.\) Policy](#)

Maintaining a Positive Employee Experience

Our core values advocate that we support and appreciate each other and embrace our differences, allowing all voices to be heard. We believe collaboration through open, honest and respectful dialogue creates success at all levels.

To best accomplish this, team members are expected to:

- ◆ Complete, be receptive to and proactive about their training, which helps them learn about the policies and laws that apply to their job.
- ◆ Ask for help and guidance when faced with uncertainty. If uncertain whether something is a violation, it is best to report it to be researched by the proper personnel.
- ◆ Report actual or *potential* violations of the Code, policies or laws using the resources referenced in section 6 of this Code which can be done anonymously.
- ◆ Seek help right away when the issue first surfaces.
- ◆ Be honest when reporting concerns, cooperative and forthcoming with investigations.

“ A firm foundation to team success comes down to three things:

- 1) Have a shared vision that is clearly communicated;
- 2) Draw the team in; play to their strengths and passions to let them bring their best self to the table; and
- 3) Establish team trust that is built on a firm understanding of their efforts' impact on the team's success.

Bill Luth
EVP Global Store Operations

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Q&A

My teammate continues to refer to me by female pronouns when I have shared with her that I identify as male and requested male pronouns. My email even has that noted on my signature! I told my manager, but my teammate continues to address me this way. Is there anything else I can do?

Yes! You took the right first step by sharing with your manager. Now it's time to reach out using the reporting resources listed in section 6 of the Code. Your concern will be investigated thoroughly.

Lead Bravely, with Integrity

While Signet strongly believes in leadership at all levels, people leaders at Signet have an enhanced role in living up to and adhering to the policies and practices set forth in our Code. In addition to the expectations above, people leaders must also:

- ✦ Support team members' training to ensure all understand and comply with the Code and applicable policies and partner with Human Resources ("HR") and E&C to help as needed.
- ✦ Promote an honest, respectful and transparent work environment.
- ✦ Listen openly to and encourage team members who raise issues and concerns.
- ✦ Promptly escalate all concerns shared using the resources referenced in this Code.
- ✦ Never retaliate against a team member who raises an issue or concern.

If members of leadership witness or suspect any retaliatory behavior against a team member who made a report in good faith, **they must report it immediately to the appropriate department as outlined in the reporting resources section 6.**

Time for Critical Thinking!

Your team member comes to you and shares that they witnessed inappropriate behavior at work from two other teammates.

Choose the best response:

- A. "Are you sure about that or might you be overreacting?"
- B. "Thank you for surfacing this. It will be researched and addressed; I will follow up with you."
- C. "Would you be willing to meet with them and discuss as a group?"

The correct response is B. To create a safe environment for reporting unethical behavior, it is important to safeguard reporting team members and equally important not to give the impression their concerns won't be heard. Gather details without challenging them or making judgments.



Diversity, Equity and Inclusion

Signet makes a concerted effort to have representation at all levels, including its Board. This includes gender, gender identity, age, sexual orientation, national origin and race representation in all aspects of the business. Such diversity and inclusion aids in understanding cultural differences and is vital to Signet's ability to

agilely grow our business by listening to and learning from various perspectives and experiences. This applies to recruiting, hiring, compensation, benefits, training, terminations, promotions or any other terms and conditions of employment.

See the [Equal Employment Opportunity Policy](#) and the [Corporate Governance Guidelines](#) for more details.

Discrimination and Harassment

We treat each team member, potential team member, customer as well as third party partner with fairness and respect. Signet does not tolerate discrimination against any individual based on any protected characteristic. In addition to being illegal, discrimination against anyone on the basis of a protected characteristic does not reflect our core values and undermines our Mission to help *all people* Celebrate Life and Express Love.

Team members play an active role in enabling our Mission and may not harass or embarrass others or create or allow an unprofessional, offensive or hostile work environment. This expectation applies to relationships with customers, other team members and our vendors.



Part of Signet’s commitment to inclusivity requires creating a welcoming, safe and healthy workplace for all. Signet does not tolerate the use, possession or distribution of political, pornographic, racist, sexist or otherwise offensive materials on our property or in our stores. This includes the use of Company property or networks to obtain or view such information. Communications on Signet’s systems do not have an expectation of privacy.

“

One thing I love about this company is that we move beyond statistics about diversity and genuinely want people to come to Signet and feel like they belong.

They can contribute in valuable ways and know that they will be heard.

Reggie Johnson
SVP NA Field HR, Chief Diversity Officer

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Examples of common legally protected characteristics include:

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

For more details, click here for the [Anti-bullying](#) policy and the “All Discriminatory Conduct Prohibited” section of the [Equal Employment Opportunity](#) policy.

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

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





Time for Critical Thinking!

Your coworker confides in you that she witnessed your manager kissing one of her direct reports. She asks your advice on what to do. What advice should you give?

Choose the best response:

- A. Keep it to herself and don't interfere in other people's personal lives.
- B. There is no need to report it; it could cause trouble for the team.
- C. She should speak up and make a report using the reporting resources in section 6.

The correct response is C; she has a duty to report this since her manager and coworker may be violating the Code. Staying quiet about it isn't an option. By reporting the information, it allows your partners in HR and/or E&C to investigate and resolve as necessary.

Health and Safety

Creating and maintaining a safe and secure physical work environment is a critical part of showing respect for each other and our customers. To facilitate this expectation, Signet is committed to a drug and alcohol-free work environment. The illegal or unauthorized possession, use or distribution of controlled substances or alcohol is prohibited. Smoking on Company premises is prohibited except where designated. While there may be occasions when alcohol is served at Company functions, team members must be responsible and consume at reasonable limits and maintain professionalism.

To protect each other from physical harm, it is important to maintain work areas that are free from hazards. Even when doing so, accidents can and do occur. Team members must report all accidents, injuries or concerns about unsafe equipment, practices or conditions to an appropriate supervisor, HR or Legal's Risk and Safety departments. In addition, Signet maintains a weapons-free workplace for team members and customers, except authorized security personnel who may be armed.

Speak Up and Report Concerns

Regardless of the capacity in which an individual is employed with or on behalf of Signet, it is expected that any activity or behavior witnessed or believed to have occurred that is contrary to our established Code or policies will be reported.

Fellow team members are here to help! Team members can reach out to their manager, any other member of management, HR, the Legal Department or E&C as outlined in the reporting resources in section 6 of this Code. Know that all of these resources are available to assist with either reporting an issue or to discuss it prior to reporting.



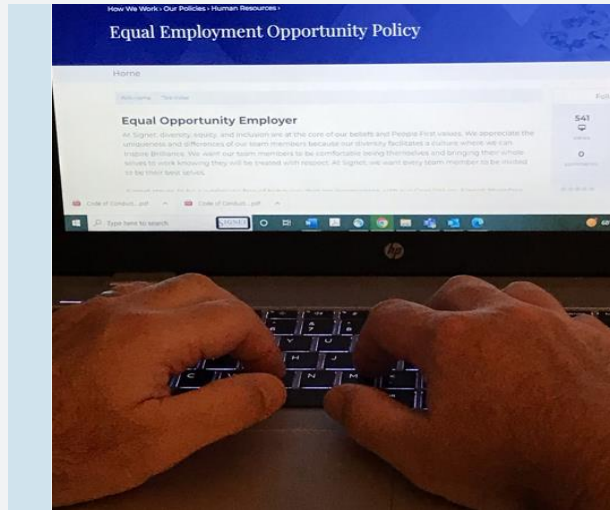
See the [Workplace Environment and Safety Policy](#) for more details.

People First - No Retaliation

Signet does not tolerate any form of retaliation against a team member who submits an issue or concern in good faith. “Good faith” means the team member sincerely and honestly believed a violation occurred. It does not mean it has to be proven by the investigation. All team members who submit an issue or concern are to be treated with respect and appreciation for sharing their concerns.



Review the [Equal Employment Opportunity Policy](#), “No Retaliation” section for more details.



Consequences for Violating the Code

In addition to *expecting* team members to report a violation of the Code or policies, failure to do so or to *knowingly* make a false report is a violation of the Code. Violations of the Code can cause harm to our brands, our culture and our reputation. Depending on the nature and type of violation of the Code, team members may be subject to disciplinary action, up to and including termination.

Anyone who directs or approves of actions that violate the Code or policies may face similar or the same disciplinary action. In some cases, violations may also result in civil or criminal penalties for team members, management or the company.

Time for Straight Talk!

I witnessed some behavior at work that has been troubling me and I think it might be against company policy. I am afraid to report it since it might negatively impact my career and it might not even be an issue.

What should I do?

Team members have a duty to report Code violations or suspected Code violations. It is important to allow the appropriate team to investigate the matter and address if needed. Demotions or failing to promote team members who have performed well because they reported a concern in good faith would be considered retaliation and should be reported to HR.

CUSTOMERS!



Our Mission:
*Helping all people Celebrate Life
and Express Love!*



Love for All People

Sales And Marketing Practices – It's About CUSTOMERS!



Part of our core values is putting our customers first, providing truly memorable experiences and striving to exceed their expectations! We delight in earning their trust and building loyalty. To maintain that loyalty, it is important for team members involved in selling, advertising, promoting and marketing our products and services to present details about them factually and completely.

We must be respectful when speaking about any of our banners and third-party partners or competitors; avoid making disparaging remarks about them. We are committed to behaving ethically when buying or selling our products and services and never use a competitor's non-public information or misrepresent facts to gain a competitive advantage.

Competition and Antitrust

Signet believes in fair and open competition and requires adherences to all applicable antitrust laws, which prohibit agreements between businesses that stunt competition and unfairly divide markets. Violations can result in severe civil and criminal penalties for Signet and any team members involved. Anti-competitive behavior includes but is not limited to:

- ◆ Agreements with competitors regarding the pricing of products or services, including discounting or promotional plans.
- ◆ Agreements with competitors about production volumes.
- ◆ Agreements or discussions with competitors about market allocation.
- ◆ Refusing to deal with a vendor or entity to reduce or eliminate competition.

To avoid the appearance of any anti-competitive behavior, team members should avoid discussing topics such as pricing, profits, production, products and services, bidding practices, distribution channels, customer information or any other non-public business matters with a competitor. This includes sharing information at informal gatherings, such as trade shows or professional associations. Contact the Legal Department with questions or issues regarding competitive information.

Our core values are a set of principles that guide us and define us. They ensure that we stay true to our Mission and live up to our Purpose.

Anti-Corruption and Anti-Bribery

Signet aspires to maintain its position as the world's largest retailer of diamond jewelry and is committed to doing so with honesty and integrity. Team members may not solicit, receive, offer or exchange bribes, illegal rebates, gratuities or kickbacks, whether the payment is made directly to the team member or through a third party. Team members cannot enter into arrangements that may illegally influence a business relationship or decision. Signet abides by all international laws, treaties and regulations that forbid bribery along with the laws wherever we do business, regardless of local customs.

A **BRIBE** is an offer or gift of anything of value or advantage that is intended to improperly influence the actions of the recipient, or the perception that it improperly influenced the recipient.

A **KICKBACK** is the return of a sum already paid or due to be paid as a reward for awarding or fostering business.

Gifts and Entertainment

The presentation of gifts or entertainment, large or small, can be problematic when given or received with the intent to influence a decision or gain an unfair advantage. In addition to monetary kickbacks described above, this can also include non-cash payments like entertainment not related to a business purpose, gifts, personal favors, political and charitable contributions, and even nontangible gifts, such as an offer of employment.

A business gift should only be given or accepted if it meets the requirements as set forth in the [Gifts and Hospitality Policy](#). If it is known or thought to be in excess of the limit or given with the intent to influence, the best course of action is to return the gift courteously and explain that Signet's Code does not permit you to accept the gift.



Time for Critical Thinking!

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

- ◆ A large box of imported chocolates.
- ◆ Box seats to an upcoming sporting event.

Potentially both! The important part is to disclose the gift to your manager and possibly others as denoted in the reporting resources of section 6. An important consideration is the timing of the gift. If there is a pending transaction or negotiation with the vendor, it is more problematic. Your manager and other Signet support personnel are here to help you make the right decision! If your manager approves, submit the proper Code of Conduct Disclosure form through Workday for decisioning from the E&C Department.

Conflicts of Interest

It may not always be clear to team members when a situation results in a conflict of interest. If team members' decision-making is impacted by their own or their families' self-interests at the expense of Signet's best interests, there may be a conflict of interest. Having a conflict of interest does not necessarily indicate wrongdoing, but it is critical that team members communicate any potential conflicts to their manager, so any potential issue can be resolved quickly and appropriately.

Conflicts of interest arise in situations where the ability to make objective business decisions on behalf of Signet is - or appears to be - compromised.

Note: Waivers for executive officers or directors may only be made by the Board or a Committee of the Board and must be promptly disclosed as required.

Time for Straight Talk!

My manager continuously uses or combines special discounts for one of his best customers in exchange for free services at his customer's place of business. It seems to be a win-win for all, so I am conflicted about reporting it. What do you suggest?

Choose the best option below:

- A. Your instincts are good! You should report it and let HR or E&C investigate.
- B. It is a win-win, so no need to say anything.
- C. It's how business is done; the company budgets for this type of activity.

A is the correct response. The manager is using his position and Signet's resources to enrich/further his own interests, not Signet's.

Conflicts of Interest (continued)

It is critical to maintain clear boundaries between work and personal endeavors or relationships to effectively conduct business and avoid conflicts of interest. Examples of conflicts of interest include but are not limited to:

- ◆ Having a business that directly competes with Signet.
- ◆ Working for or sitting on a board of directors.
- ◆ Working on outside interests during work hours.
- ◆ Using company resources for personal reasons, without the team member's manager's approval.
- ◆ Family members or friends in a direct reporting relationship without properly disclosing the relationship.
- ◆ Family members or partners who are associated with vendors utilized by Signet without properly disclosing the relationship or interest.
- ◆ Team members, relatives or friends who have a financial interest, relationship or influence over goods or services provided to Signet without properly disclosing it.

Disclosing the relationships or interest helps manage actual or perceived conflict or favoritism.

There may be times when you are uncertain if business or personal interests and activities are in conflict with the Code. The Disclosure Process and Form are easy ways for team members to raise any potential conflict of interest, concern or question for further review. See section 6 for more details. Once a concern is surfaced or submitted for review, team members should not take any action on the concern until directed to do so by management or E&C.

Board membership is permissible for organizations that are not competitors of Signet, do not conflict with Signet's objectives, and do not have any influence on Signet's business decisions. You must obtain management approval before joining a for-profit (or paid) board.



Please refer to the [Conflicts of Interest Policy](#) for more details

Time for Straight Talk!

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

It is a conflict of interest to use influence with the vendor selection process to award business to one's family's company. The buyer should use the Disclosure Process mentioned above before any decisions are made about utilizing the family business or not.

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

Using Social Media

Signet recognizes that social media is an integral part of our team members everyday life and we rely on its use to promote our banners, identify trends and stay connected with our customers. While there are many benefits of social media, the ability to spread information quickly to a wide range of people is not without risk. We must be careful with what we share on social media. It is best to share positive content that furthers our Purpose, such as career achievements or enthusiasm for new products (after it has been made public.) Team members must not be discourteous or disrespectful to competitors, vendors, customers, or any member of the public while in the course and scope of Company business.



For more information and details, click here for the [Social Media Policy](#).



Time for Critical Thinking!

Which of the following would be acceptable to post while conducting company business?

- ◆ One of the worst vendors we work with is coming today. I am just not in the mood! Wish me luck!!
- ◆ WOW! I just saw our upcoming Holiday ad on TV and it includes our new product line. I'm going to post a link to it as soon as it hits our website!
- ◆ OMG - the most-high maintenance customer is on his way in right now! Help me!

If you selected the second one, you are correct! As long as the team member waits for the product and ad to be released, it is acceptable to share her enthusiasm through social media.

Safeguarding Data

Depending on their role at Signet, team members may have access to confidential information about the Company, fellow team members, and our customers or vendors. All team members must safeguard confidential information and may not access or share the information with others unless required to do so to perform their duties or responsibilities. All team members and former team members are expected to follow all policies and procedures regarding sensitive, confidential and proprietary Company information.

Confidential information should not be shared with anyone outside of Signet, including team members' family members and friends.



Once information has been released to the public, it can be shared by team members or if the Legal Department approves the disclosure. If uncertain whether information is confidential, please consult your manager or the Legal Department as denoted in [section 6](#).

Q&A

My co-worker's friend stopped in and asked me for her new cell phone number. I don't know her number, but I know it is in the system.

Since I have met him a few times and they are friends, is that OK?

No. All data and records obtained through Signet have to be safeguarded – not just data marked “Confidential” or “Proprietary.” You only have access to that information as a fellow Signet team member.

It is also important to safeguard other's privacy. It's your co-worker's decision whether or not to share *any* personal information, e.g. contact numbers, address, work schedule. You can take his information and give it to your teammate, but you may not give out other's personal information (customer's or coworker's).

For more details, see our [Information Security Policies](#).

This Code does not limit a team member’s right to communicate in good faith with any government agency for reporting a possible violation of the law or to participate in an investigation that may be conducted by any government agency. The following are some of the government agencies with whom team members can report concerns:

- ◆ Equal Employment Opportunity Commission
- ◆ National Labor Relations Board
- ◆ Occupational Safety and Health Administration
- ◆ U.S. Securities and Exchange Commission
- ◆ Financial Industry Regulatory Authority or any other federal, state or local governmental agency or commission

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

Insider Trading

While working for Signet, team members may have access to information that a reasonable investor would find important in deciding whether to buy or sell stock. Such information is considered *material*. Team members are not permitted to buy or sell Signet stock based on material, non-public information or provide the information to third parties to do the same. This type of activity is known as “Insider Trading.” It is prohibited by federal law and can result in large fines and incarceration. It is important to note that insider trading can occur regardless of how the information was obtained and regardless of whether or not it influenced the decision to buy or sell stock.

Examples of material information include information regarding financial results before they are made public, daily sales and volume reports, plans for or pending mergers and acquisitions, or significant changes in management.

For further details, see the [Code for Securities Transactions](#).

Time for Critical Thinking!

Your friend tells you they just learned about an exciting new product we’re going to launch soon. They’re sure it’s going to be profitable for the Company and can’t wait to tell their friends and family about it in the hopes they will buy stock in the Company - before word spreads.

Choose the best advice below to give your friend:

- Tell them how lucky they are to have a behind the scenes look at the business and that their family can share in that good fortune.
- Tell them discussing the Company’s confidential information outside the office with anyone who does not have a business need to know is not allowed and could get everyone in trouble.

The second option is correct. In addition to being against company policy, discussing Company confidential information outside the office can be considered “tipping”, which is illegal. Regardless of whether their friends or family buy or sell stock based on that information, it is a violation of insider trading laws.



Anti-Money Laundering

As a global company, we must be vigilant in safeguarding businesses and financial systems from the abuses of financial crimes, including financing terrorism, money laundering, and other illicit activity. As retailers of high value goods, we may be targets at various parts of our supply chain and in our stores for money launderers.

Team members must be alert and help prevent terrorist activities or money laundering. Watch for the following activities:

- ✦ Multiple money orders.
- ✦ Large volume purchases of gift cards or large cash transactions.
- ✦ A customer or third party who is reluctant to provide complete information, provides false or suspicious information or is anxious about record-keeping requirements.
- ✦ Structuring a transaction to avoid reaching the dollar threshold required for reporting purposes.
- ✦ Requests from a supplier to redirect payment(s) to an uncertified bank account.

Identifying the behavior is the first step to prevention; it is important to know that while the behaviors above are suspicious, there may be legitimate, honest reasons for them. It is imperative that we never accuse customers or vendors of wrongdoing or insinuate it. If you suspect a customer or vendor of money laundering, report it immediately.

For more details, please review the [Anti-Money Laundering Policy](#).

Human Rights

Everyone deserves to be treated fairly and with dignity. Signet pursues its business activities in an ethical, responsible and professional manner and requests the same of the vendors with whom we do business. For example, Signet requires such standards through our merchandise Vendor Buying Agreements, and we conduct due diligence to make sure they operate in accordance with these standards.

See our [Supplier Code of Conduct](#) on our Corporate website for details.

Money laundering is the process of making illegally gained funds seem legitimate; disguising financial assets so they can be used without detection of the illegal activity that produced them.



Q&A

I have a customer who has come into the store for the past few weeks and purchased some very expensive pieces of jewelry with cash. Each purchase is under \$10,000, but the cash payments and price point are out of the ordinary for him.

Something doesn't seem right. What should I do?

You should report your concerns immediately to your manager and the E&C or Legal Department.

You have correctly spotted a red flag of *potential* money laundering which Signet must investigate further.



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Love for our Planet and Products

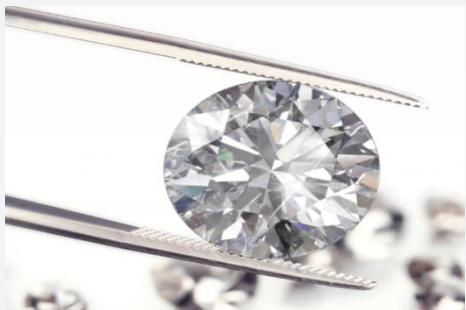


Product Excellence

Signet builds trust with customers and maintains their loyalty by providing them with quality products and services and honoring our guarantees and warranties. It is critical to our continued success that team members who source, select, sell and service our merchandise do so in accordance with established policies and procedures.

Responsible Sourcing

Signet recognizes that our merchandise is connected to a complex supply chain filled with concerns about the origins of our products. We also know that our customers are especially sensitive to this aspect of the business due to the emotional component of their purchase. Signet has been at the forefront of responsible sourcing and has taken steps to improve the transparency of the jewelry supply chain.



For more details, see our [Responsible Sourcing Protocol](#) on our Corporate website.

International Trade Controls & Boycotts

While there are inherent risks in trading in precious gems and metals globally, Signet recognizes those risks and mitigates them with a commitment to continuously improve and refine our operations. Signet makes sure the products we offer customers are sourced legally and conflict-free. Signet is a founding and certified member of the Responsible Jewelers Council (“RJC”), which is the global standard for responsible practices in the jewelry industry. We encourage membership for all suppliers. Suppliers that are certified RJC members receive scheduled audits by independent third-party firms as part of a rigorous and comprehensive RJC Code of Practices certification process. In addition, for all suppliers, purchase order terms and conditions include statements regarding compliance with all laws.

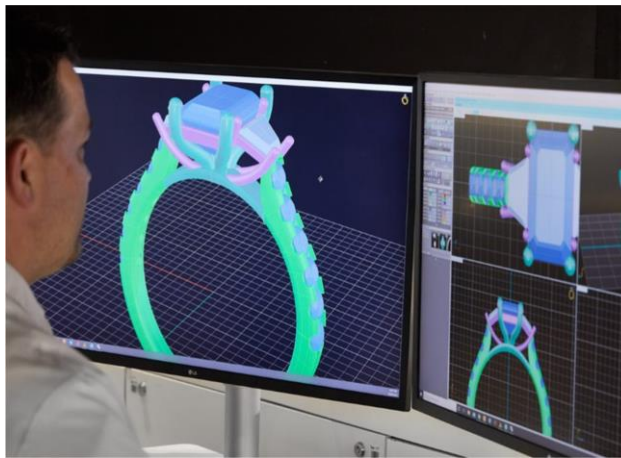
A boycott occurs when a person, group or country refuses to do business with other people or countries. Signet does not cooperate with boycotts that are not approved by the U.S. government. In addition, Signet does not do business with individuals or entities that are under sanction by the U.S.

See the [Corporate Citizenship and Sustainability Report](#) on our Corporate website for more details.

Third Party Compliance

Signet is committed to doing the right thing, even when no one is watching. Doing so safeguards our banners' reputations and ensures our customers' continued trust in doing business with us. We expect those with whom we partner to offer products and services to our customers to do the same.

All third parties with whom Signet partners to procure goods or offer services to customers are required to perform their work in compliance with applicable laws, rules and regulations. They also must adhere to our standards as outlined in our Vendor Buying Agreements, which require that they acknowledge and align with our Supplier Code as well.



Clear your mind of “can’t.” That makes fulfilling our Purpose and making a difference in the world, which are so important to me, possible.

We are committed to fair wages, fair labor practices and transparency in our supply chain throughout the world.

Stephen Lovejoy
Chief Supply Chain Officer



Protecting Company Assets

Sustainability and growth depend not just on innovation but in safeguarding those assets we already have. All team members are required to protect Signet's assets, whether financial, tangible or intangible, and to use those assets solely for lawful Company purposes. Developments or work products that team members create or design within the scope of their employment are owned by the Company. Team members may not remove, share, damage, or destroy any Company asset without authorization from management or in accordance with [Information Security Policies](#).

Examples of intangible property include our banner logos, copyrights, patents, trade secrets, trademarks, design rights, inventions, processes, systems, customer lists and software. Tangible assets include our Corporate Offices, equipment, supplies, computers and funds.



Q&A

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

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



Accurate Records

All team members create business records while working for Signet; from wage and hour, product inventory, sales transactions, to travel expenses - we must be sure the information we record is accurate and complete. This information is used to plan for the future and is shared with investors and regulators. This makes sure Signet can honor its commitment to accurately and truthfully submit business transactions to government agencies when required.

Falsifying records, including but not limited to work hours, contracts, invoices, purchase orders, or expenses is illegal and strictly prohibited. Team members are prohibited from changing, omitting or manipulating any records to hide improper activity or misrepresent the nature of a transaction. Working "off the clock" is strictly prohibited.



Time for Straight Talk!

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

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



Record Retention

We have an ethical and legal obligation that our records, like those referenced above, are maintained and recorded in a timely fashion. Effectively managing and retaining our records allows us to meet our business needs and makes sure records are available when needed.

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

Fraud

Preventing and detecting fraud is integral to maintaining our brand reputation and is key to safeguarding the Company from losses, financial or reputational. Common fraudulent acts include but are not limited to:

- ✦ Signing someone else's name to a contract or document without proper authority to do so.
- ✦ Improperly characterizing a corporate expense.
- ✦ Falsifying company records, such as inflating key performance indicators or back dating contracts.
- ✦ Altering payroll data.

If you are unsure how to document any record, especially those that impact our financial records, seek assistance from your management team. If a team member is aware of or believes that a transaction or record has been improperly recorded or has any concern related to accounting or accounting controls, please report that using the reporting resources in section 6.

Political Contributions and Involvement

Team members have the right to vote and be politically active on their own behalf. Company resources or funds cannot be used for political activities. Only designated or approved representatives of Signet are permitted to speak on the Company's behalf.

Team members should never suggest or imply that they are acting on behalf of Signet when making a personal political contribution. Equally important - team members should never pressure coworkers to make donations or contributions.

Audits & Investigations

A culture of ethics and compliance requires transparency. All team members must fully cooperate with investigations, internal or external. We must never destroy or modify any records that may be relevant to an investigation. Any concerns about sharing information can be discussed with management, HR, Legal or E&C.

Fraud involves intentionally concealing or misrepresenting facts in order to deceive or mislead.



Reporting Resources and Disclosure Process

Reporting Resources

Important items to note regarding all the reporting resources referenced throughout this Code and below:

- ◆ Concerns or questions can be submitted anonymously to any resource. Since investigations can be hampered by reporting anonymously, it is important to include as much detail as possible to allow for a thorough investigation.
- ◆ Signet takes all concerns seriously and commits to handle each report promptly, confidentially and professionally. We strive to maintain the reporting team member's anonymity, while thoroughly investigating the assertions in the report.

Those who bring forward concerns or questions through the reporting process will be treated with respect and without retaliation. Review the "No Retaliation" section within the [Equal Employment Opportunity Policy](#).

To maintain the confidentiality of the investigations, specific findings or actions taken as a result of the investigation may not be shared with the reporting team member. To maintain as much transparency as possible, the investigators will keep the reporting party informed of the general status of the investigation.

Reporting Resources & Contact Information



Email Addresses for Reporting:

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

E&C: ethics@signetjewelers.com

T.I.P.S.*: www.signet.ethicspoint.com

North America HR: EmployeeRelations@signetjewelers.com

North America Legal: legal@signetjewelers.com

UK HR: hradvice@signetjewelers.com

UK Legal: uklegal@signetjewelers.com



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

North America: 800-984-TIPS (8477)

Israel: 844-431-3618

United Kingdom: 855-838-4705

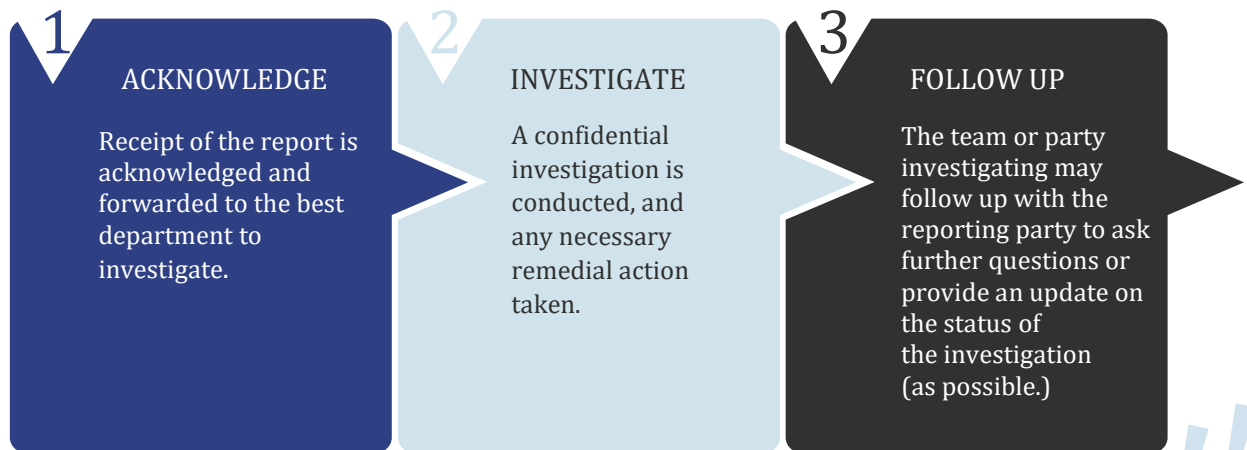
India: 800-984-TIPS (8477)

Ireland: 855-325-1982

Botswana: 833-725-5473

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

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



Time for Straight Talk!

I think a team member submitted a false T.I.P.S. report about me to hurt my credibility. He should be disciplined for being dishonest, right?

Action taken against anyone as a result of submitting a good faith T.I.P.S. report is considered retaliation and is prohibited. You can reach out to HR to discuss your concerns; they can investigate and determine next steps.

Disclosure Process

The E&C Department created the Code of Conduct Disclosure Process as an easy way for team members to:

- ◆ Submit information or requests related to a potential Conflict of Interest.
- ◆ Disclose or request an exception to any policy in the Code.
- ◆ Raise concerns, ask questions about or report violations of the Code.

The [Disclosure Process](#) form and detailed instructions about how to complete it are always available in Workday by accessing the “My Disclosure” application from the home page.



“

Trust your instincts, use your resources, including this Code and policies, to do the right thing, and continue making this a “great place to work!”

Kirsten Riede
Sr. Director, AGC
Global Corporate Compliance

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