

[About the T.I.P.S. Line Program](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About the T.I.P.S. Line Program

What is the T.I.P.S. Line Program?

The T.I.P.S. Line Program (Take It Personally, Signet) is a comprehensive and confidential reporting tool to assist management and employees in working together to address fraud, abuse, and other serious misconduct in the workplace, all while cultivating a positive work environment. The T.I.P.S. Line Program includes both telephony and web-based reporting capabilities, meaning that Team Members can report concerns of fraud, abuse, and other serious misconduct by telephone or through a web portal.

Why do we need a program like the T.I.P.S. Line?

- At Signet, we believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity. A system like the T.I.P.S. Line, as well as our other Compliance & Ethics initiatives, also touches on all of our Core Values:
 - People First
 - The T.I.P.S. Line helps us support each other and deliver on our mission to Celebrate Life and Express Love every day.
 - Lead Bravely
 - The T.I.P.S. Line is another tool helping us to fearlessly transform our future with courage, and shows our commitment to winning by making a difference.
 - Own It
 - The T.I.P.S. Line allows us to deliver on our commitment to personal accountability, helps us learn, and aids in our striving for continuous improvement.
 - Customers!
 - At Signet, we strive to always exceed the expectations of our customers, including internal customers – our Team Members! The T.I.P.S. Line helps us to gain trust and be leaders in providing an ethical work environment.
 - Straight Talk

- We seek the truth together and tell it like it is, even when that is difficult. The T.I.P.S. Line is a great avenue in the pursuit of Straight Talk.
- As a publicly traded company, Signet is required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- Having an effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With the T.I.P.S. Line, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What happens when I call the T.I.P.S. Line?

24 hours a day, 7 days a week, a representative of NAVEX Global – the third party that Signet has retained to manage the T.I.P.S. Line and web-based reporting tool – will answer your call and create a report based on the information that you provide. They may ask you questions about your report to ensure that they understand the information that you are reporting. Please provide as much detail as you know to assist the ensuing investigation, such as names of involved parties, dates, locations, etc. Before ending the call, the NAVEX Global representative will read the transcribed report back to you and ask if it is correct. If the report did not accurately capture the information that you provided, you may correct the information at that time.

What type of situations should I report?

The T.I.P.S. Line Program is designed for employees to report any violation of our stated *Code of Conduct*, or other concern of misconduct or fraud that you may have. You, as a Team Member, know what is happening at Signet and may have knowledge of an activity that may be cause for concern. Your reporting of such situations can help minimize any potentially negative impact on the Company and our Team Members.

If I see a violation, shouldn't I just report it to my manager, security, or Human Resources and let them deal with it?

As a Signet Team Member, you are expected to report actual and/or potential violations of the *Code of Conduct*, other Company policies, and law. Signet believes that open communication is the basis for strong Team Member relations and encourages Team Members to ask questions of and report concerns to their supervisor(s) to maintain those open lines of communication. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. For this reason, Signet provides multiple avenues for Team Members to communicate issues or concerns, including with the T.I.P.S. Line. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

All Team Members have the right to work in a positive environment. With that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. In fact, all Team Members have an obligation under our *Code of Conduct* to report actual or potential violations of the *Code of Conduct*, other Company policies, and law. A single ethical violation, whether real or perceived, can overshadow the great work that we do at Signet Jewelers.

Does management really want me to report?

Absolutely! In fact, we *need* you to report. You know what is going on in our Company - both the good and the bad. You may be the only person with initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on our people and the Company. Signet takes all concerns, questions, and complaints seriously, and handles them promptly, professionally, and with discretion.

Where do these reports go? Who can access them?

Reports are entered directly on the T.I.P.S. Line secure server to prevent any possible breach in security. That secure server is managed and maintained by a third party – NAVEX Global – that Signet retains to help ensure the security and The system makes these reports available only to specific individuals within the Signet Compliance & Ethics department who are charged with evaluating the report. Each of these report recipients have been trained in keeping these reports in the utmost confidence. Depending on the type of reported violation, the report will be investigated by a District Manager, Regional Vice President/Sr. Director, Loss Prevention professional, Human Resources Business Partner, or one of the Company's Compliance & Ethics Internal Investigators.

What if my boss or other managers are involved in a violation? Will they receive my report?

No! The T.I.P.S. Line system and report distribution protocols are designed so that implicated parties are not notified about or granted access to reports in which they have been named.

What if I remember something else about the incident after I make the report?

Not to worry – when you file a report, you will be given a unique report key and asked to enter a password. With that report key and password, you can return to the system at any time, by phone or online, and access the original report to add more details.

I do not have my report key and password. What do I do now?

You must have both the unique report key and password to check the status of your report, to make a follow up report, or add new information. If you do not have the report key and password, you will have to file a new report. You will receive a new unique report key and enter a new password. If this happens, you may mention in your new report that you filed a previous report.

What if I report my concern anonymously and you have questions for me concerning my report?

The T.I.P.S. Line system enables the Compliance & Ethics professional who reviewed your report to post questions and messages to you, even if you report it anonymously. Utilizing your unique report key and password, you are then able to respond to those questions and messages, all while maintaining your anonymity.

Reporting Security & Confidentiality

It is my understanding that any report I send from a Signet device generates a server log that shows every web-site that my device connects with, and won't this log identify me as a report originator?

The T.I.P.S. Line system does not generate or maintain any internal connection logs with IP addresses, so no information linking your device to the T.I.P.S. Line is available. In fact, the third party that manages the T.I.P.S. Line platform is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work device, you have the option of using a device outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the T.I.P.S. Line secure website.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the T.I.P.S. Line system strips away Internet addresses so that anonymity is totally maintained. Plus, the T.I.P.S. Line administrators are contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide to the T.I.P.S. Line will ultimately reveal my identity. How can you assure me that will not happen?

The T.I.P.S. Line system is designed to protect your anonymity, should you choose to report your concern anonymously. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free hotline confidential and anonymous too?

Yes, as long as anonymous reporting is permitted by local law. You will be asked to provide the same information that you would provide in an Internet-based report and a live interviewer will type your responses into the T.I.P.S. Line website. These reports have the same security and confidentiality measures applied to them during delivery. The live interviewer is not a Signet Team Member, but rather is a representative from NAVEX Global – the third party that Signet has retained to service this hotline.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Signet is committed to promoting ethical behavior. All unethical conduct, at any level, ultimately hurts the Company and all Team Members, including you. A single ethical violation, whether real or perceived, can overshadow the great work that we do here at Signet. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of Company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. The T.I.P.S. Line can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you were unsure.

Can I still file a report if I don't have access to the Internet?

You can file a T.I.P.S. Line report from any device that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the T.I.P.S. toll-free hotline, which is available 24 hours a day, 365 days a year.