



WATCHES OF SWITZERLAND GROUP PLC

HUMAN RIGHTS POLICY

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Watches of Switzerland Group ('the Group') is an international retailer of world leading luxury watch brands, with a growing complement of luxury jewellery brands. We employ circa 3,200 colleagues across the UK and US and contract with approximately 1,600 suppliers worldwide.

We acknowledge the influence our business and supply chains can have on the lives of colleagues, supply chain workers and communities, and are committed to conducting our business in ways that contribute to economic inclusion, fair wages, safe working conditions and long-term livelihood opportunities for those connected to our operations and sourcing practices.

The Group is committed to protecting the enjoyment of human rights for all and we operate in accordance with the International Bill of Human Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights).

The Group also takes into account the United Nations Framework and Guiding Principles as well as other internationally accepted human rights standards, including the OECD Guidelines for Multinational Enterprises and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and other core conventions.

In recognition of the critical role women play across our industry, we work to ensure women have equal opportunities, are protected from all forms of discrimination and harassment, and are empowered to participate fully and fairly in our business and supply chain. We monitor all current and emerging human rights-related regulation including the UK Modern Slavery Act 2015 and ensure that our policies and practices evolve accordingly.

SCOPE

This Policy is applicable to all full and part time colleagues, officers, consultants, temporary contractors, agents of the Group, casual workers, individuals on work experience or interning at the Group, and agency workers and certain partners such as joint venture partners. Any third parties working on behalf of the Group, including its associated persons are also expected to comply with the Policy. It should be read and observed alongside the following Group Policies:

- Vendor Code of Conduct
- Code of Ethics
- Whistleblowing Policy
- Modern Slavery Statement
- Board Diversity and Inclusion Policy
- Modern Slavery Statement
- Supplier Sustainability Standards

OUR COMMITMENT

In implementing this Policy, we will:

- Assess the Group's impact on human rights in our operations and supply chain
- Take action to mitigate human rights risks in our operations and supply chain
- Integrate poverty reduction and women's rights considerations into our due diligence, supplier standards, and community charity programmes
- Ensure suppliers are evaluated not only on commercial merit and alignment with our supplier sustainability standards, but also on their contribution to a more inclusive supply ecosystem
- Ensure grievance mechanisms, including a confidential whistleblowing reporting process, are in place for everyone we impact, to raise concerns
- Remedy any adverse human rights impacts we cause, contribute to, or are linked with
- Communicate our progress with stakeholders

To meet these objectives, we will:

- Develop and maintain in-house human rights expertise
- Ensure relevant colleagues and departments understand how their work can impact on human rights, supported by timely and adequate training
- Ensure supplier partners uphold our expectations and common principles detailed in our Supplier Sustainability Standards.
- Implement adequate due diligence to evaluate and remediate human capital impacts in our operations and supply chains
- Due diligence should include, but not be limited to, screening new suppliers and monitoring existing suppliers for labour practices and human rights performance, supplier self-assessment questionnaires, supplier management and capability building activities, factory audits and corrective action plans to address any non-compliance
- Ensure immediate remediation is provided if it is found human rights are adversely affected in our operations or supply chains
- Regularly engage stakeholders with the ongoing development, implementation and evaluation of the effectiveness of this Policy
- Regularly review the Group's policies and procedures to ensure consistency with the principles of this Policy
- Report progress against our commitments to the ESG Committee, our Board, internally to colleagues and publicly via our annual Modern Slavery Statement.

We take allegations of human rights abuse in all its forms extremely seriously and will not tolerate human rights abuses against anyone working for our Group, or individuals or groups in any way associated with our business.

We are committed to building strong, long-term relationships with all our stakeholders and will always collaborate to resolve issues, wherever possible. However, if we find evidence of a serious breach of our terms, we will not hesitate to terminate any contract, make a public disclosure and notify the relevant authorities.

RESPONSIBILITIES

The Board of Watches of Switzerland Group PLC is committed to ensuring the Group's activities are conducted in accordance with all applicable legal and regulatory requirements and the highest standards of ethical business conduct.

This Policy is owned by our Board, which receives regular updates on our human rights performance to ensure suitable support is available for its implementation.

All colleagues are required to comply with this policy and undertake diligently and expeditiously such training as the Group may provide or otherwise specify from time to time.

REPORTING A CONCERN

All colleagues are required to comply with this Policy.

Failure to comply with this Policy or the Company's training requirements may result in disciplinary action, which may in serious cases lead to dismissal, and may also expose the Company and/or its colleagues to criminal or civil liability.

If any colleague believes that the terms of this Policy are not being correctly adhered to, then they should seek to raise any concerns with their Head of Department or Retail Director or Line Manager, or in accordance with the terms of the Group's Whistleblowing Policy. Under the terms of the Whistleblowing Policy, colleagues are encouraged, without fear of victimisation, to raise any concerns they may have regarding the conduct of the Group's business in order that such concerns may be properly investigated.

This facility is managed by Safecall and reporting can be done by phone or online in multiple languages via Safecall's secure web reporting facility, www.safecall.co.uk/report.

The Company will not tolerate retaliation of any kind by or on behalf of the Company or any colleague against any individual for making good faith reports of violations or suspected violations of this policy.

Colleagues must co-operate fully and openly with any investigation by the Company into alleged or suspected breaches of this policy. Failure to co-operate or to provide truthful information during any investigation may lead to employees being subject to disciplinary action, which may lead to dismissal.

MONITORING

The Company will take steps to monitor compliance with this Policy.

Monitoring of compliance with this Policy may include reviewing the extent and nature of commercial agreements, arrangements and other practices, the nature and extent of relationships with competitors and trade associations and the assessment of pricing practices

The Human Rights Policy will be reviewed annually by the Watches of Switzerland Group PLC Board.

The Policy was approved by the Watches of Switzerland Group PLC Board on 08 October 2025.