

SUPPLIER SUSTAINABILITY STANDARDS

START >



WATCHES OF SWITZERLAND
SINCE 1924

Mappin & Webb
LONDON

GOLDSMITHS

EST. 1810
MAYORS
FINE JEWELRY & TIMEPIECES

BETTERIDGE
EST 1897

Analog:Shift
VINTAGE & PRE-OWNED WATCHES

MONO-BRAND
BOUTIQUES

Deutsch & Deutsch
DD

“THESE SUPPLIER SUSTAINABILITY STANDARDS HAVE BEEN DEVELOPED AS A PART OF THE WATCHES OF SWITZERLAND GROUP’S COMMITMENT TO ENVIRONMENTAL AND SOCIAL STEWARDSHIP AND HIGHLIGHT OUR SHARED RESPONSIBILITY IN PROMOTING LONG-TERM RESILIENCE IN OUR GLOBAL SUPPLY CHAINS.”

Baroness (Rosa) Monckton MBE,
Chair of the Environmental Social and Governance (ESG) Committee

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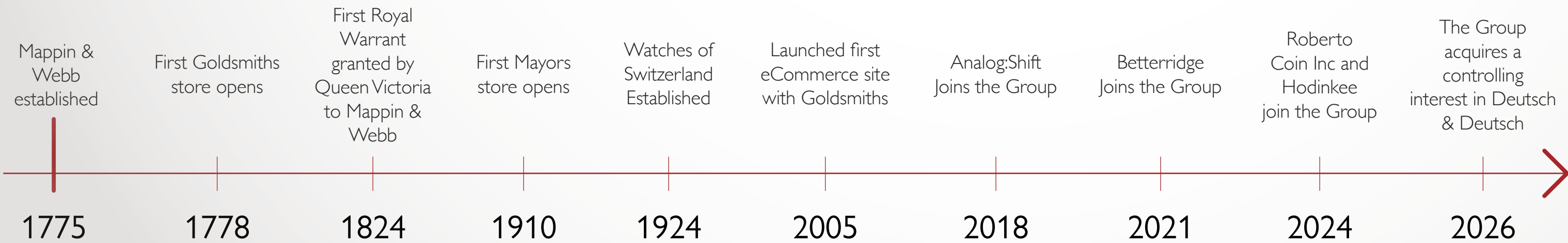
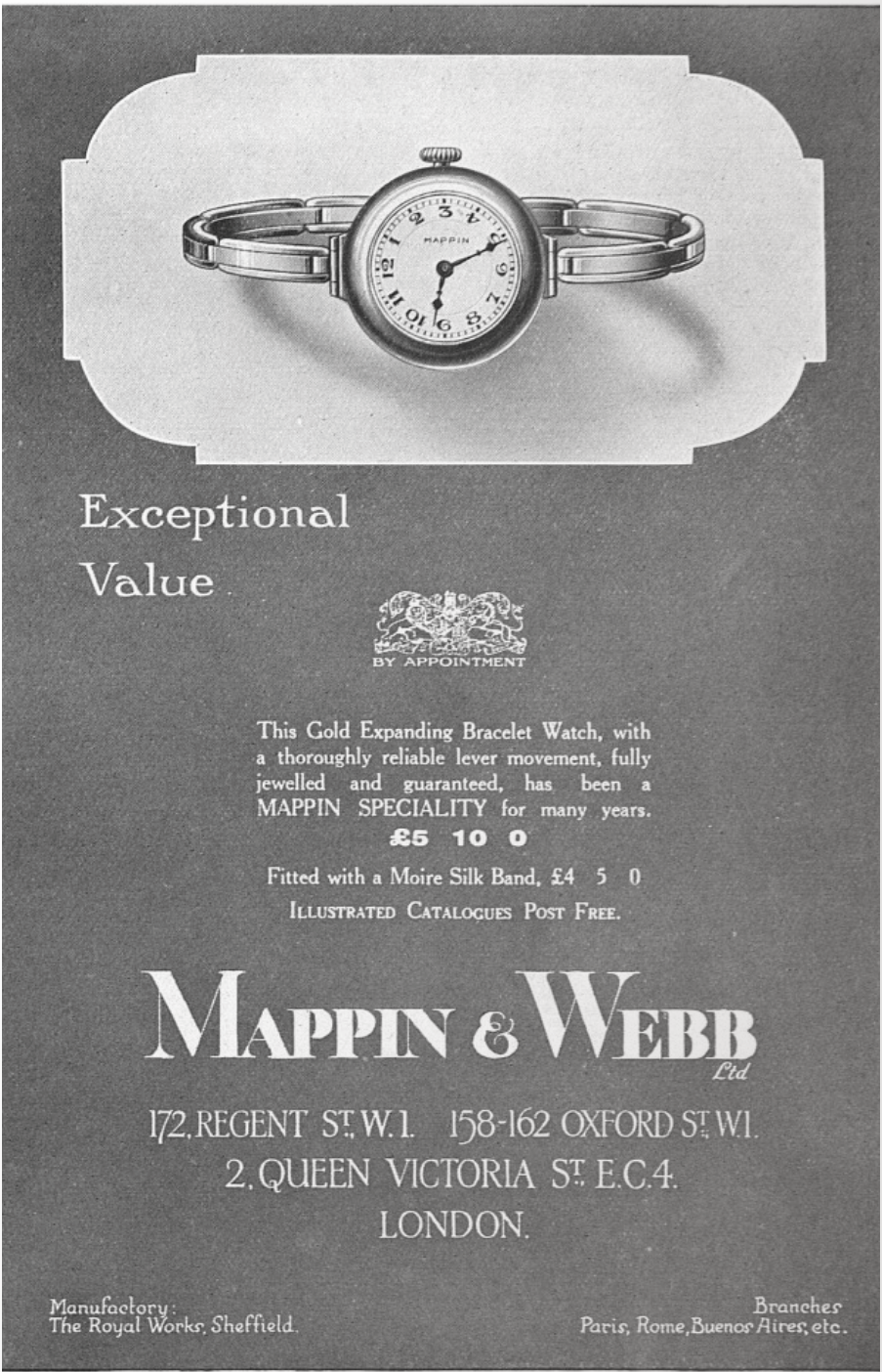
SUSTAINABILITY AT WATCHES OF SWITZERLAND GROUP

A sustainable future built on an historic past.

Watches of Switzerland Group has been providing clients with fine jewellery, elegant silverware, watches, and unique lifestyle accessories for 250 years.

We attribute our success in sustaining and growing our business, to a combination of world class service and longstanding partnerships with brands and suppliers who share our values and commitment to ensure that the products we sell, and services we use, meet the highest environmental and social standards and performance criteria.

By adhering to these Supplier Sustainability Standards - in ways appropriate to the purpose, nature, scale and impact of your business - we can future-proof our businesses and look forward to delighting many more generations of clients, together.



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HELP US ACHIEVE OUR PURPOSE

“WE ARE BUILDING A MORE **SUSTAINABLE** AND **VALUABLE BUSINESS**. WE CAN ONLY ACHIEVE THIS BY WORKING IN PARTNERSHIP WITH SUPPLIERS WHO SHARE OUR VALUES AND CAN **HELP US TO ACHIEVE OUR PURPOSE.**”

Brian Duffy, CEO Watches of Switzerland Group

Caring for our supplier community

We are driven by our Purpose to WOW our clients, while caring for our colleagues, our communities and our planet.

We also have a duty of care to ensure our supply chain operates responsibly and respects and protects the lives of workers, their communities and our shared environment.

These Supplier Sustainability Standards outline our approach to social and environmental stewardship, and provide guidance around the common practices we expect throughout our global supply chain and in all our dealings - in addition to full compliance with all relevant local, national and international laws and regulations.

Please read this document in conjunction with our:



Vendor Code of Conduct



General Conditions of Purchase



Operating Manual (where applicable)

If you have any questions about these Supplier Sustainability Standards or environmental and social matters within the Watches of Switzerland Group, please speak to your business contact, or email Kesah Trowell, Group Head of Sustainability at SustainabilityStandards@thewosgroup.com

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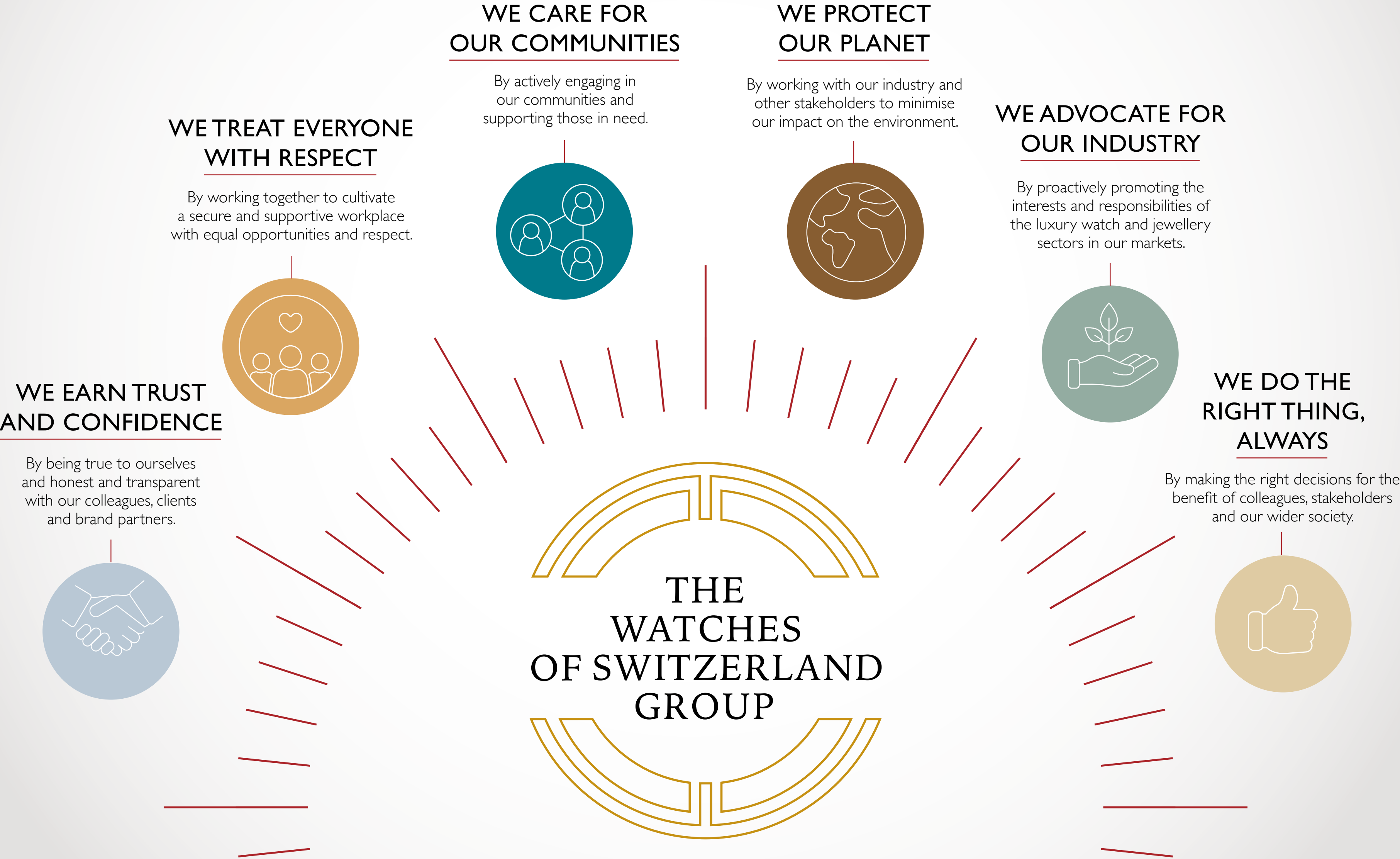
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Throughout these Standards, we highlight our strategic and regulatory focuses and the high standards we expect throughout our partnership.

Please read and communicate the principles of these Standards to workers, subsidiaries and relevant third parties, to help raise awareness of our goals, and identify and address any potential risks to the sustainability and reputation of our business.

We will monitor and review these Standards on an annual basis, and update them in line with changes in our requirements and/or legislation.



Our Expectations

- Signed acceptance of our **Vendor Code of Conduct** or an equivalent commitment that is publicly available.
- Embed basic business ethics principles into a code of conduct or a similar policy, including adherence to local and national laws and regulations - specifically laws related to business ethics, responsible sourcing, human rights, and environmental responsibilities.
- Have a grievance procedure in place for workers to confidentially raise concerns.
- Ensure relevant workers understand, and are competent in, their responsibilities in line with these Standards.
- Publicly report on business practices, through an annual report or other communications channel, and take steps to ensure the accuracy and quality of the information disclosed.

sustainability /səˌsteɪnəˈbɪlɪti/ **noun**

The quality of being able to continue over a period of time. *The long-term sustainability of the community.*

Our Focus Areas

- Contracting with supplier partners who share common values and can help us to achieve our Purpose.
- Engaging supplier partners and relevant third parties with the principles of these Standards.
- Measuring, monitoring and reporting on the performance of suppliers against our expectations.
- Advocating, influencing and promoting responsible business practices throughout our operation and value chain, and encouraging suppliers to do the same.

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UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (UNSDGGS)

The UN Sustainability goals define 17 global challenges.

They provide a framework to help governments, businesses and people all over the world to prioritise and mobilise efforts to achieve common targets.

Leading organisations and businesses align their business strategies with these Goals, which are designed to help identify common purposes and opportunities for collective action.

The hope is that together, we can create impactful solutions for the challenges facing our communities and our planet.

The Watches of Switzerland Group supports the achievement of these Global Goals and encourages supplier partners to do the same.

The Group also supports the UN Global Compact, which aims to drive business awareness and action in support of achieving the Sustainable Development Goals.



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“OUR APPROACH TO ENVIRONMENTAL STEWARDSHIP IS TO DO THE RIGHT THING - SUPPORTING A MORE CIRCULAR ECONOMY, WHILE SAFEGUARDING OUR BUSINESS AGAINST CLIMATE-RELATED RISKS.”

Anders Romberg, Chief Financial Officer

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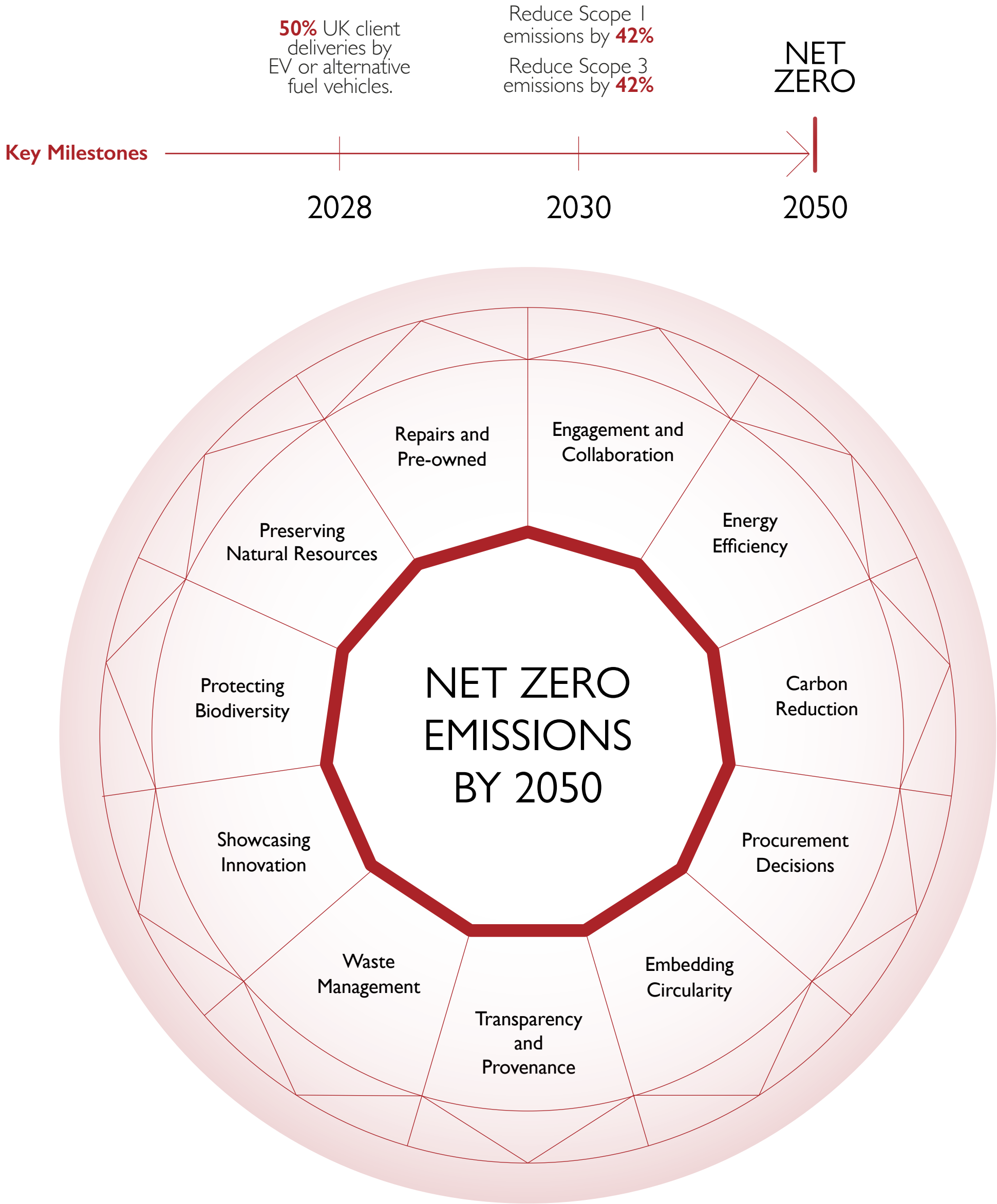
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ENVIRONMENT: OUR APPROACH

Our key areas of focus are:

- Understanding, assessing, reporting and mitigating against **climate and nature-related risks** within our operation and supply chain.
- Achieving our **carbon emissions reduction targets**, which have been validated by the Science Based Targets initiative and are aligned with limiting global warming to 1.5°C, to avoid the worst effects of climate change.
- Continuous improvement in **carbon reduction and energy efficiency** achieved through showroom design and modification, procurement decisions, facilities management, transportation, and switching to clean energy sources.
- Embedding an environmental management system to **protect our environment**, fulfil environmental obligations and enhance our environmental performance.
- Minimising waste** through avoidance, recycling and adopting 'circular economy' principles.
- Reducing our **reliance on natural resources** including the more efficient use of energy and water.
- Helping clients **reduce their environmental impact** by extending the life of watches and jewellery through repairs and pre-owned businesses.
- Helping clients **make more sustainable choices** by growing our range of products with positive environmental and social attributes, as well as promoting innovation and advancements in sustainable design and packaging.
- Streamlining business processes** and leveraging technology to improve data quality, transparency and disclosure.



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ENVIRONMENT: OUR BUSINESS IMPACTS AND POLICY

Respect for the environment and local ecosystems is an important part of how we do business.

Our **Environment Policy** sets out how we manage and operate our business, to minimise any adverse effects on our planet and public health.

This Policy applies to our Group operations worldwide and all colleagues, including temporary or contract workers. It covers legislative compliance, transparent dealings, risk management, stakeholder engagement, collaboration, climate change and preserving natural resources.

We understand our business and supply chain have the potential to negatively impact our planet through the production and retailing of products, energy use, transportation, water, waste and the mining of metals and gemstones.

We are minimising these impacts and improving our overall environmental performance by engaging stakeholders, encouraging positive behavioural changes, and participating in initiatives to build climate change resilience and protect biodiversity.



Our Expectations

- Compliance with all applicable local and international environmental regulation.
- A formal environmental policy, or equivalent public statement, outlining your commitment to responsible environmental practices and continuous improvement, including, but not limited to, raw materials and minerals, energy, carbon emissions, water, waste, chemical and hazardous substances, air quality, deforestation, biodiversity and nature.
- Alignment with relevant, well-recognised **environmental standards and accreditations**.
- Availability of data and insights in support of the achievement of common environmental goals.
- Advocate for responsible environmental practices.
- Publicly report any material negative impacts on the environment from your business operation.

Our Focus Areas

- Seeking and ensuring compliance with our environmental requirements and measures.
- Encouraging our suppliers to align with relevant, well-recognised **sustainability standards and/or certifications**.
- Building trusted, long-term relationships with environmentally responsible supplier partners and collaborating to improve data collection, transparency and due diligence.

WE ALL HAVE A
**RESPONSIBILITY TO
PROTECT OUR PLANET
AND CONSERVE
RESOURCES FOR
FUTURE GENERATIONS**

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GREENHOUSE GASES (GHG) SCOPE 1, 2 & 3 EMISSIONS

Reducing Greenhouse Gas (GHG) emissions and improving air quality can benefit human health and help mitigate against the impact of severe weather, caused by a changing climate.

We are committed to building climate resilience and achieving net-zero GHG emissions by 2050.

We are taking prioritised action to reduce our GHG emissions in line with what the latest climate science says is necessary to meet the goals of the Paris Agreement and pursue efforts to limit warming to 1.5°C.

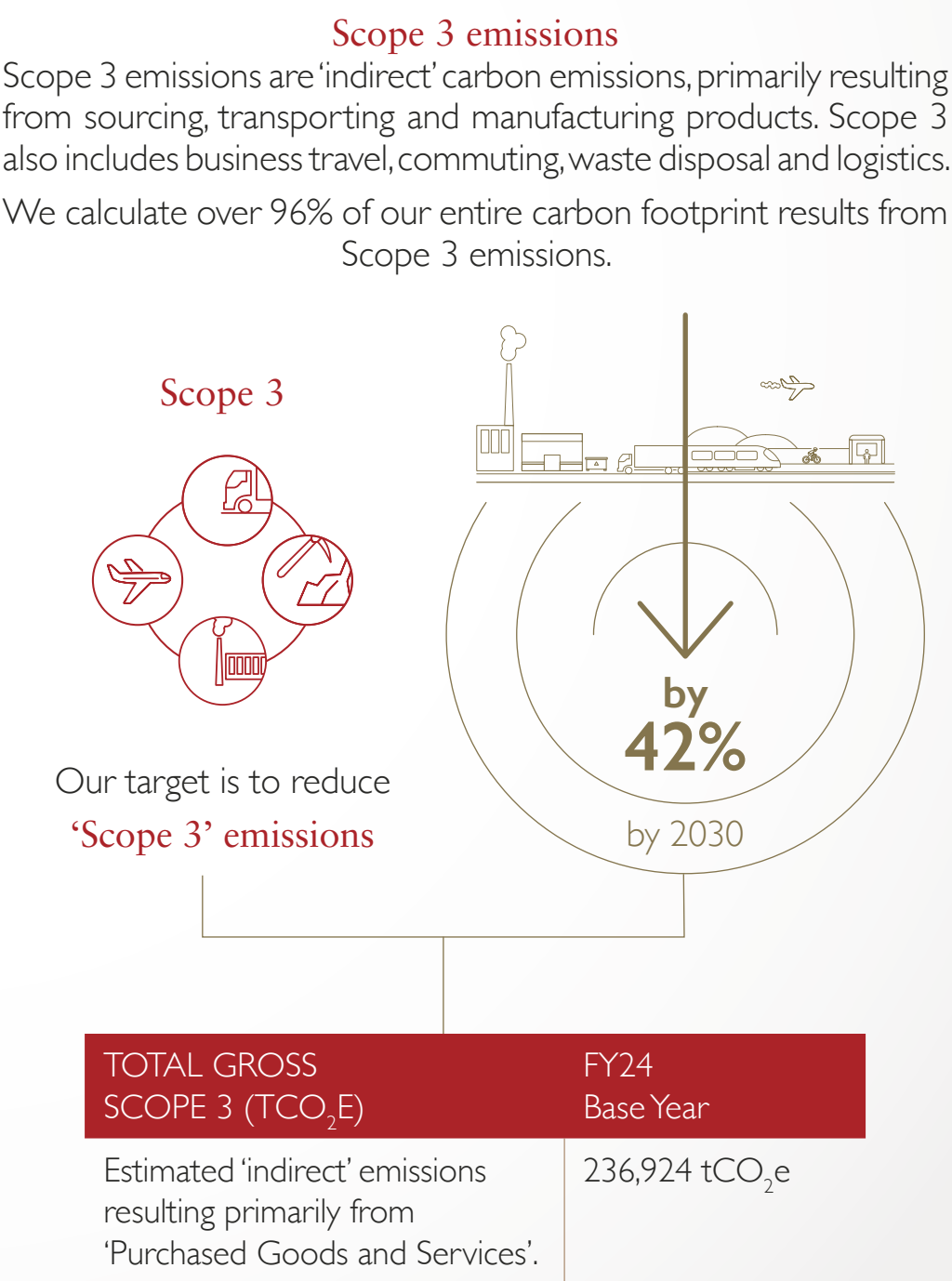
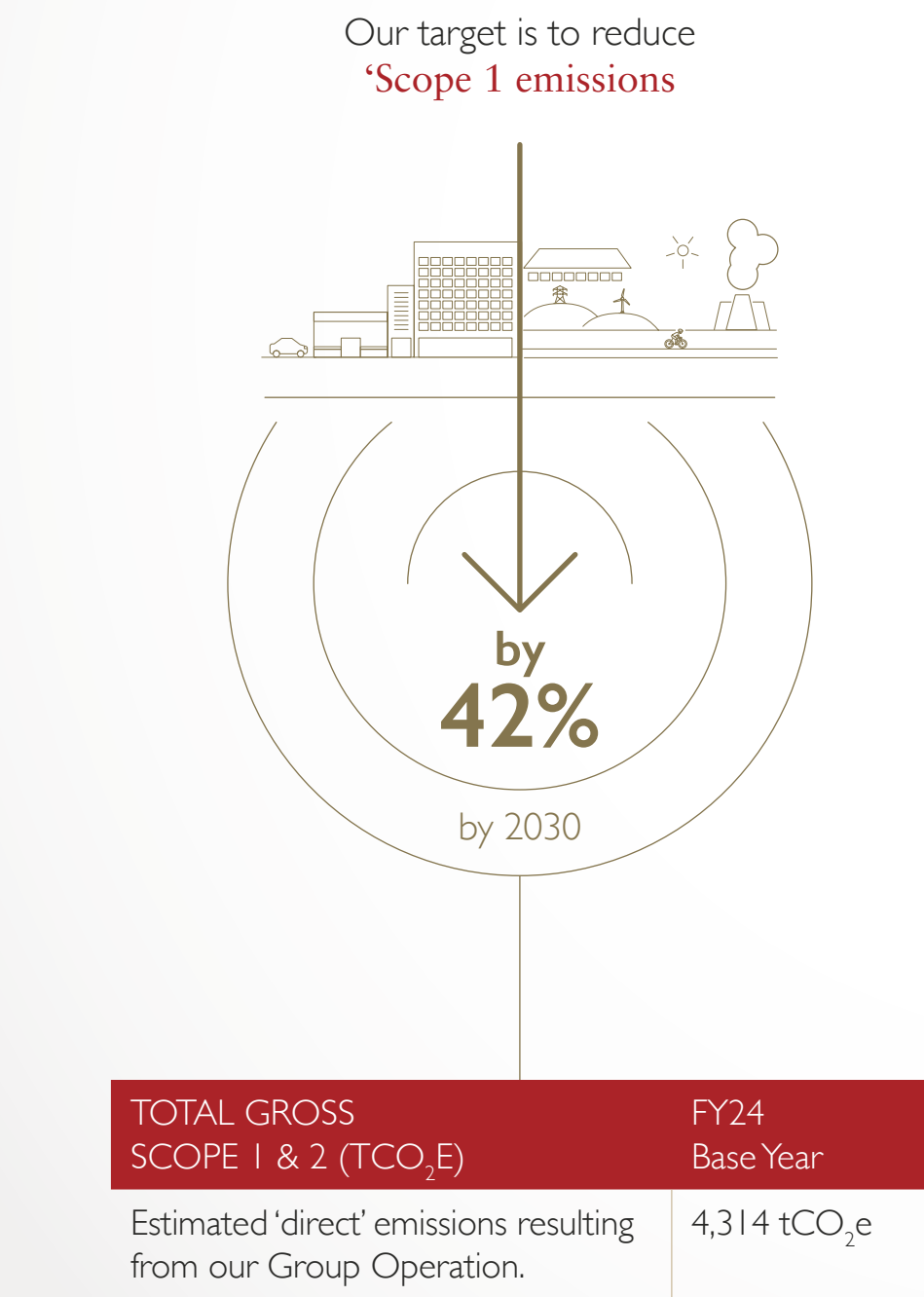
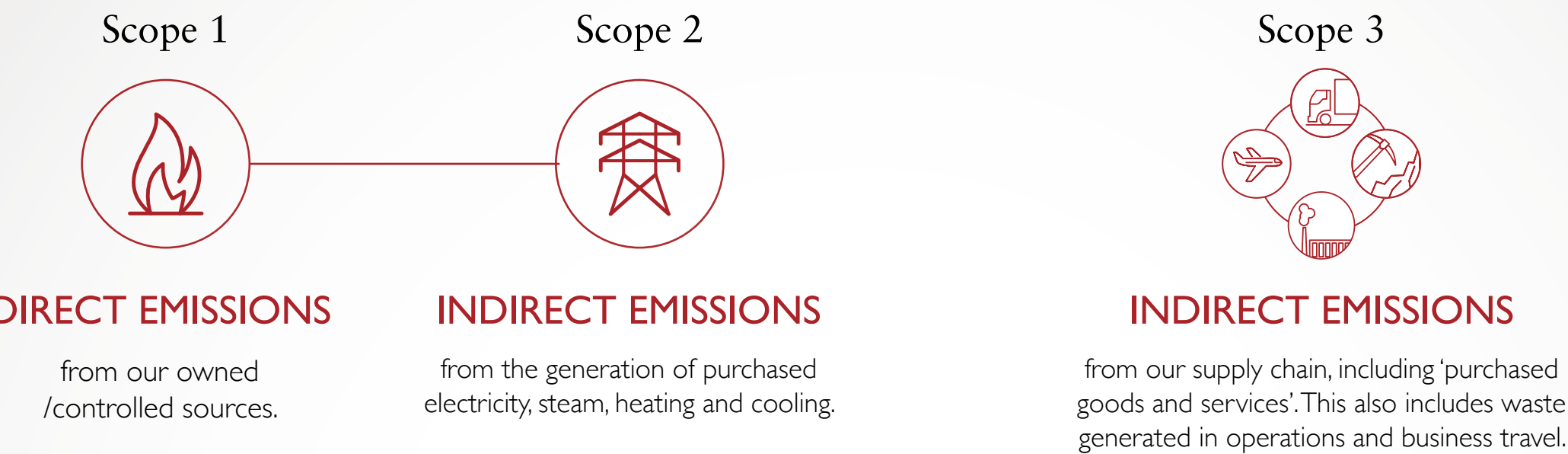
Our net-zero emissions reduction targets to 2050 have been approved by the Science Based Targets initiative (SBTi), which is a global body and collaboration between CDP, the UN Global Compact, World Resources Institute and the Worldwide Fund for Nature.



“The ambition of Watches of Switzerland Group’s targets is aligned with the need for the global economy to rapidly cut emissions. This company is setting an example for the rest of its industry, and I urge others in its sector to set their own targets too.”

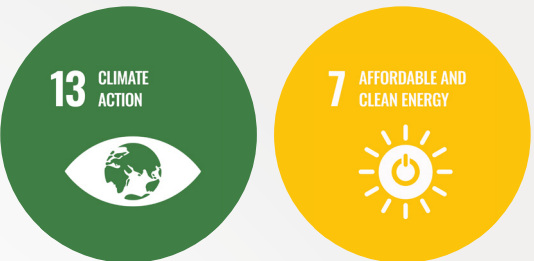
- Luiz Amaral, Chief Executive Officer of the Science Based Targets initiative

The Greenhouse Gas Protocol categorises GHG emissions into three ‘scopes’ – 1, 2 & 3.



We cannot meet these targets alone and welcome partner collaboration and innovation across our value chain.

Our approach to calculating and reporting our GHG emissions follows the WRI.WBCSD GHG Protocol Corporate Accounting and Reporting Standards (Revised).



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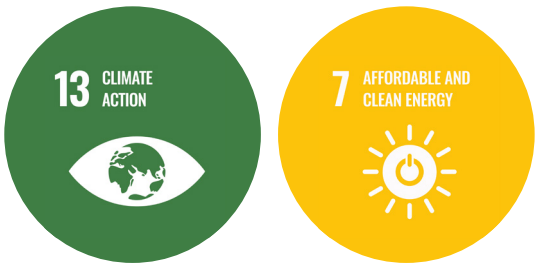
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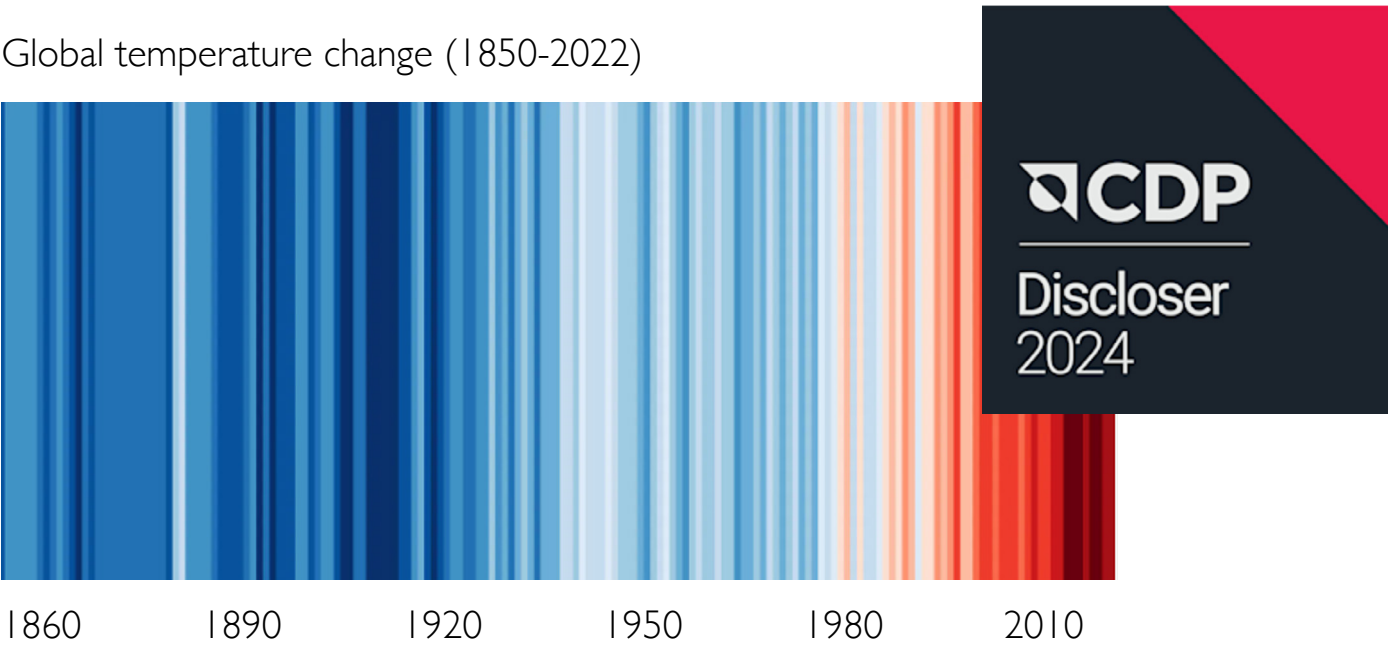


Extreme weather can impact our business in a number of ways; including damage to properties, increased energy use for heating and cooling, a rise in insurance costs and the need to understand and comply with growing environmental legislation.

To continue to WOW our clients and achieve our business objectives, we have a responsibility to assess our value chain for severe weather-related risks, which might disrupt our ability to execute our strategy effectively.

We use 'Climate Scenario Analysis' (CSA) to help predict weather-related risks over the short (5 years), medium (5-10 years) and long-term (10+ years), which can include disruptions to logistics, access to raw materials, carbon taxation schemes and worker displacement.

We are also required by law to annually report on how we are identifying and managing climate-related risks to our value chain in a structured, transparent and measurable way.



Our Expectations

- Assess the direct and indirect cumulative impacts, and potential impacts, of extreme weather events on your ability to deliver on our contractual obligations over the short, medium and long term.
- Identify, measure and monitor Scope 1 and 2 Greenhouse Gas (GHG) emissions and publicly report this data, accompanied by financial statements, on an annual basis or respond to our request for this information.
- Aim to have your emissions data independently verified.
- Wherever possible, commit to setting carbon reduction targets with the **Science Based Targets initiative** and plan to eliminate carbon emissions from your operation by at least 2050.
- Consider publicly reporting your emissions via the **CDP** questionnaire on climate change or another public platform.
- Endeavour to understand and share the carbon footprint of each product or service you supply to improve the accuracy of our reporting.

Our Focus Areas

- Safeguarding our business against climate-related risks and identifying climate-related opportunities.
- Reducing carbon emissions generated by our operation and improving energy efficiency.
- Engaging supplier partners with our expectations in relation to carbon disclosure and advocacy.
- Improving how we collect GHG emissions data from supplier partners.
- Identifying and assessing emissions hotspots across our value chain and prioritising reduction strategies.
- Collaborating with supplier partners to understand the carbon footprint of the individual products we sell and services we use.
- Ranging more low carbon products, and reporting emissions savings.

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ENERGY MANAGEMENT

Operational risks related to energy costs, dependency and regulations, can be reduced with good energy management.

We strive to use energy in the most efficient, cost effective and responsible way and comply with all relevant local and international environmental laws and regulations.

We source electricity from renewable sources wherever installation is financially and practically viable, and our energy management system includes enhancing data collection and implementing energy efficient technologies, such as LED lighting and motion sensors throughout our estate to reduce energy waste.

When searching for new premises and negotiating leases, we prefer locations with green building certifications, which demonstrates a landlord's commitment to assessing and improving a building's environmental performance, including energy efficiency.

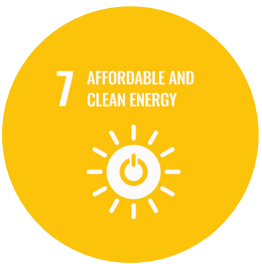


Our Expectations

- Comply with local, national, and international energy and environmental laws and regulations.
- Transition towards renewable, or clean energy sources, wherever possible.
- Adopt an Energy Management System to systematically monitor, manage and reduce energy consumption.
- Align with reputable, **relevant frameworks** that address energy use, efficiency and sustainability, such as ISO50001, LEED or BREEAM.

Our Focus Areas

- Continuously improving energy efficiency through our procurement decisions, showroom modification and design, facilities management, transportation and renewable energy sources.
- Collaborating with supplier partners to explore and adopt innovative technologies that reduce energy consumption.
- Sourcing 100% renewable energy across our Group within properties we control and where installation is financially and practically viable.
- Generating our own energy where possible.
- Mitigating against the risk of an energy outage.



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TRANSPORTATION AND LOGISTICS



Transport causes air and noise pollution and habitat fragmentation, and is a significant contributor to global Greenhouse Gas (GHG) emissions.

We are working to accurately measure, monitor and reduce harmful emissions caused by downstream transportation, business travel and colleague commuting.

Current initiatives to reduce road and air travel include transitioning to a fully electric or alternative fuel vehicle fleet, limiting colleague air travel, and encouraging car sharing and the use of public transport wherever practical.

Video conferencing capabilities support flexible working and digital meetings, and our online concierge allows clients to interact with expert sales assistants and purchase products without the need to travel to stores.

The impact of transporting products is subject to ongoing evaluation and we seek to work with partners who can help us to achieve our emission reduction goals.

Our Expectations

- Continually improve the efficiency of transport and logistics to reduce harmful emissions and pollution.
- Reduce the impact of air freight, by purchasing high-weight, low-value materials locally, or transport them via the most environmentally friendly options available.
- Consider participation in joint industry transportation initiatives such as **EV100**, which is a global initiative bringing together forward-looking companies committed to accelerating the transition to electric vehicles (EVs).
- Availability of data and insights in support of the achievement of common environmental goals.

Our Focus Areas

- Increasing the efficiency of transport and logistics to minimise related harmful emissions.
- Delivering products to clients in the most environmentally friendly ways.
- Transitioning to a fully electric or alternative fuel fleet.
- Limiting colleague travel to journeys necessary to advance business objectives.
- Mitigating against the impact of severe weather on our ability to deliver on our client's expectations and transport products.

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SUPPORTING A CIRCULAR ECONOMY

A circular economy is a sustainable system in which resources are used, reused, and recycled to conserve resources and minimise waste and pollution.

Circularity helps to conserve finite natural resources and reduce emissions caused by the extraction of raw materials and the manufacturing process.

Resource efficiency and circularity can enhance companies' competitiveness through reduced costs and environmental liabilities. It can also mean companies are better prepared for future environmental regulations.

Our Expectations

- Maximise the value of natural resources, minimise waste and reuse materials wherever possible.
- Design products to be more durable, reusable, repairable, and recyclable.
- Recover waste back into production processes, for example, in product or packaging design.
- Recycled gold or other precious metals must demonstrate legal compliance according to the provisions of the financial market supervisory authority and be sourced from refineries on the London Bullion Market Association Good Delivery List or the UAE Gold Good Delivery Scheme.
- Source necessary raw materials from mines that strive to establish a self-sustaining ecosystem, and use techniques for restoring the impacted local environment.

Our Focus Areas

- Extending the life of products by increasing our after-sales and servicing capacity, and growing our pre-owned watch and jewellery businesses.
- Considering circularity in the design and modification of stores, offices, equipment, and processes.
- Supporting circular principles in our own brand packaging.
- Helping clients reduce their environmental impact by promoting innovations in circular design and materials.

WE ARE COMMITTED TO PROMOTING INNOVATION AND ADVANCEMENT IN CIRCULAR DESIGN AND PRODUCTION, WHILE EXTENDING THE LIFE OF WATCHES AND JEWELLERY THROUGH OUR REPAIRS, SERVICING AND PRE-OWNED BUSINESSES.



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WASTE MANAGEMENT

Effective waste management systems can prevent pollution, conserve natural resources and help reduce costs. Waste materials can also be used to make new products and support a circular economy.

Poor waste management can threaten human health, biodiversity and marine life through water and air contamination, and soil erosion.

We are committed to preventing and reducing waste by directing it away from landfills towards recycling, composting, or other forms of recovery.

Where hazardous substances must be used, we follow strict guidelines for recording, labelling, storing, handling and transportation. Relevant colleagues are also trained in the safe handling and management of potentially harmful substances.



Our Expectations

- Comply with all applicable national and international laws and regulations and maintain necessary permits, licences and certifications.
- Identify significant waste and emissions to air, water and land generated by your business processes, and responsibly manage them.
- Ensure the responsible handling, use and disposal of hazardous substances and clearly and actively communicate potential risks to everyone coming into contact with them.
- Wherever technically feasible and economically viable, use alternatives to hazardous substances in your business processes.
- Strive to continuously improve your environmental performance and apply the principles of reduce, reuse, recycle and recover to minimise your environmental life-cycle impacts.
- Publicly share information on waste management programmes, including targets to minimise waste.

WE WANT TO PARTNER WITH SUPPLIERS WHO SUPPORT OUR GOAL TO MINIMISE WASTE THROUGH AVOIDANCE, RECYCLING AND ADOPTING CIRCULAR ECONOMY PRINCIPLES.

Our Focus Areas

- Working with accredited waste management providers, to reduce waste.
- Using licensed waste contractors who operate to international hazardous waste **accreditation standards**.
- Sorting waste materials for recycling and reuse.
- Improving data to gain an accurate understanding of waste and hazardous waste generation, reduction and disposal.



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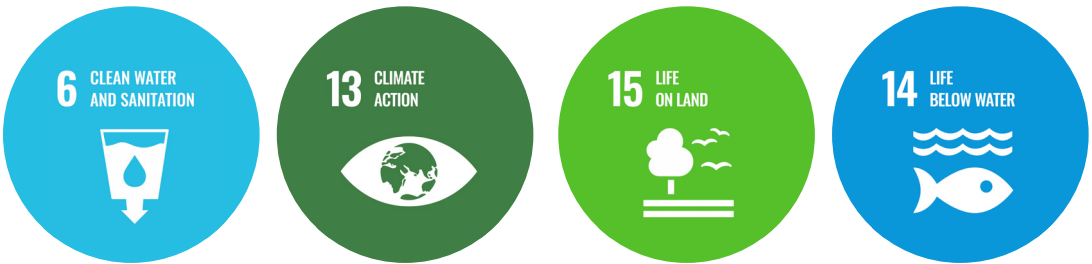
BIODIVERSITY AND OUR IMPACT ON NATURAL CAPITAL

Nature and biodiversity form the foundation of the world’s economy, yet they are deteriorating and declining faster than at any time in human history.

We are working to understand the risks and opportunities in relation to nature-related issues within our value chain, in order to ensure they are incorporated into our strategic planning, risk management and asset allocation decisions.

Our impact on biodiversity and nature is considered as a factor when procuring products and services, as well as in the design and modification of showrooms, offices, equipment, and processes.

We will not tolerate any harsh or inhumane treatment of animals and all suppliers must conform to relevant international laws and have processes in place to protect endangered species and habitats.



Our Expectations

- Comply with all relevant local, national and international environmental legislation and regulations.
- Identify, assess and minimise your impact on biodiversity and natural resources and protect endangered species* and habitats.
- Source animal skins from farmed and sustainably managed sources and conform to relevant international laws including the **Convention on International Trade in Endangered Species (CITES)**.
- Extract metals and minerals in accordance with the **International Council on Mining and Metals (ICMM)** mining principles, to assess and address biodiversity and eco-system risks and impacts.
- Commit to no-deforestation and source timber certified by the **Forest Stewardship Council (FSC)** or an equivalent Standard, and make every effort to reduce wood waste.
- Conduct industrial wastewater quality testing and/or monitoring as required by local law for manufacturers and minimise water waste.
- Suppliers with significant adverse impacts on natural capital, should publicly report, at least annually, on affected areas and the effectiveness of any actions, controls or targets implemented to mitigate these impacts.

Our Focus Areas

- Understanding, assessing and minimising the impact of our business on biodiversity and natural capital.
- Offering clients more socially and environmentally preferable product options.
- Identifying, monitoring and ensuring the efficient use of natural resources, including water and land.
- Ensuring ‘guarantees of origin’ records are kept and available for audit.
- Reporting progress in rehabilitating any adversely impacted ecosystems identified through our assessments.
- Reporting incidents of non-compliance with water quality or quantity permits, standards, or regulations.

NATURAL CAPITAL IS THE WORLD’S STOCKS OF NATURAL ASSETS WHICH INCLUDE GEOLOGY, SOIL, AIR, WATER AND ALL LIVING THINGS.

* Species listed by the **International Union for Conservation of Nature (IUCN)**

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We want to help clients make more sustainable choices by offering the highest quality pieces from responsible, ethical and verifiable sources.

Colleagues with a responsibility for sourcing are trained in relevant environmental and social regulations and encouraged to work with supplier partners to implement responsible practices.

Our goal is to achieve full traceability of products, in order to evaluate their environmental and social impact. We also seek to ensure all precious metals and gemstones are ethically sourced from non-conflict countries.

Our Expectations

- A clear commitment to integrating specifications, requirements and criteria to help protect the environment and society into your business operation and supply chain, alongside considerations, such as price, quality and reliability.
- A **Supply Chain Policy** or equivalent, clearly stating your position on responsible sourcing from Conflict-Affected and High-Risk Areas (CAHRAs).
- Suppliers of gold, silver, PGM (Platinum Group Metals), diamonds and coloured gemstones, must follow the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals** from CAHRAs or have an equivalent framework appropriate to your size and circumstances.
- A **Conflict Minerals Policy** or equivalent commitment to promoting sustainable conflict minerals (tin, tungsten, tantalum and gold) and management in your supply chain.
- Precious metals must be sourced from refineries registered on the **London Bullion Market Association** Good Delivery List or the **UAE Gold Good Delivery Scheme** – and in compliance with **financial market supervisory** authority legal provisions.
- Document and apply a **Know Your Counterparty (KYC) Policy** and associated procedures for suppliers and customers of gold, silver, PGM, diamonds, coloured gemstones, jewellery and other products containing these materials.
- Provide a **signed Guarantee of Conflict Free Compliance**.
- Regularly audit and reconcile records of warranty invoices, as well as invoices issued when buying or selling diamonds.
- Include provisions in supplier contracts to source from refiners third-party audited in line with **OECD Guidance**.
- Seek to provide full traceability of products and their component parts.

OUR GOAL IS
TO **ACHIEVE FULL**
TRACEABILITY
OF PRODUCTS

Our Focus Areas

- Implementing rigorous procurement processes, including due diligence with respect to partners and vendors.
- Ongoing engagement with partners to build trust and strengthen relationships.
- Striving for full traceability of products and component parts to help mitigate against risk and comply with emerging regulations.
- Ensuring ‘guarantees of origin’ records are kept and available for audit.

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GUARANTEE OF CONFLICT FREE COMPLIANCE – WATCHES AND JEWELLERY

To comply with the requirements of The Office of Foreign Assets Control (OFAC) of the US Department of Treasury, where relevant, suppliers of watches and jewellery may be required to sign a Guarantee of Conflict Free Compliance and include a statement to this effect on all acceptances of our orders, as well as delivery documentation and invoices:



Guarantee of conflict free compliance statement

The Seller guarantees that all goods and their constituent parts supplied in accordance with this document meet all the following criteria:

1. All diamonds detailed in this and/or the attached document have been sourced in compliance with United Nations Resolutions and corresponding national laws from legitimate sources that are not involved in funding conflict, all the diamonds are conflict free and the Seller confirms adherence to the World Diamond Council System of Warranties Guidelines; and
2. All diamonds detailed in this and/or the attached document are natural, untreated and are confirmed by the Seller as having been screened and/or verified by instruments tested by the UL Laboratories under the Project Assure system to have 0% (zero per cent) diamond false positive rate; and
3. All goods detailed in this and/or the attached document have been sourced from legitimate sources that are neither involved directly or indirectly in funding conflict nor are located in any countries sanctioned by The United Nations or any of its subsidiary bodies, the US Government or any of its subsidiary bodies (such as the Office of Foreign Assets Control ("OFAC") or the Customs and Border Protection (CBP)) the UK Government or any of its subsidiary bodies or the EU or any of its Member States or any of their subsidiary bodies; and
4. All goods detailed in this and/or the attached document have been sourced from legitimate sources that are neither owned or controlled by, nor acting for or on behalf of, any countries, individuals or companies sanctioned by The United Nations or any of its subsidiary bodies, The US Government or any of its subsidiary bodies (such as The Office of Foreign Assets Control ("OFAC") or the Customers and Border Protection (CBP)) or the UK Government or any of its subsidiary bodies or by the EU or any of its Member States or any of their subsidiary bodies; and
5. All goods detailed in this and/or the attached document are supplied in compliance with the following laws: the US Bank Secrecy Act; USA Patriots Act; US Foreign Corrupt Practices Act; US Clean Diamonds Act; US Dodd-Frank Act; UK Bribery Act 2010 and the UK Modern Slavery Act 2015.

This guarantee is based on personal knowledge and/or written guarantees provided by each previous supplier of the goods and/or their constituent parts to the Seller.

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GUIDANCE ON NON-INDUSTRIAL DIAMONDS AND DIAMOND JEWELLERY AND UNSORTED DIAMONDS

All suppliers of watches, jewellery and precious metals to Watches of Switzerland Group must comply with all relevant national and international law and legislation, which includes all sanctions and requirements, including those imposed by the US Department of the Treasury and The Office of Foreign Assets Control.

G7 ban on Russian diamonds (.5ct+)

Purchasing diamonds and precious metals such as silver, gold and platinum from sanctioned Russian entities or individuals is likely to contribute to ongoing human rights abuses and conflict.

Watches of Switzerland Group has ceased all trade in precious metals and diamonds from sanctioned Russian sources, therefore such products should not be supplied to us - whether the Sanctions have been imposed within your country of operation or not. This will remain in effect until further notice.

All entry and certified from summary transactions, as well as goods admitted into a Foreign Trade Zone (FTZ), that include the affected commodities require a self-certification statement.

The following statement(s) should be included with every delivery into either our Distribution Centre or individual showrooms.

For non-industrial diamonds with a weight of 1.0 carat or greater, the following statement must be provided on official company letterhead. (PDF Format if submitted electronically)

"I certify that the non-industrial diamonds in this shipment were not mined, extracted, produced, or manufactured wholly or in part in the Russian Federation, notwithstanding whether such diamonds have been substantially transformed into other products outside of the Russian Federation."

For diamond jewellery and unsorted diamonds, the following statement must be provided on official company letterhead. (PDF Format if submitted electronically)

"I certify that the diamond jewellery and unsorted diamonds in this shipment are not of Russian Federation origin or were not exported from the Russian Federation."



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SUSTAINABLE PROCUREMENT – DIAMONDS

Knowing where our diamonds come from allows us to reassure clients that they are authentic and ethically sourced.

Everyone involved in the buying and selling of rough diamonds, polished diamonds, or jewellery containing diamonds is obliged to follow trade association resolutions and receive training on government restrictions prohibiting the trade in conflict diamonds.

All diamonds supplied to us must be conflict free and accompanied by written guarantees. Once a diamond is imported and ready for trade, we require a **World Diamond Council System of Warranties Assurance Statement (WDC SoW)** on every invoice through to the final client invoice.

Lab-created diamonds are artificially produced in a laboratory, while natural diamonds are formed naturally within the Earth’s mantle over millions of years. They appear identical, so it is crucial we understand the value, authenticity and uniqueness of the natural diamonds we offer. Click [here](#) for more information on lab-grown diamonds..

WORLD DIAMOND COUNCIL SYSTEM OF WARRANTIES ASSURANCE STATEMENT

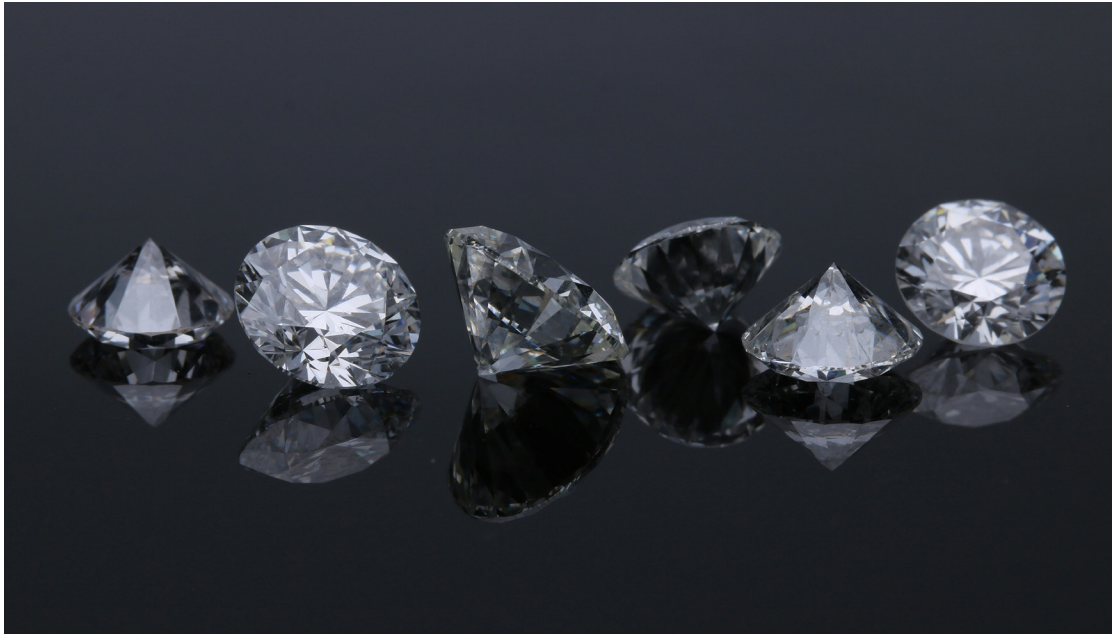
“The diamonds herein invoiced have been {sourced} purchased from legitimate sources not involved in the funding of conflict, in compliance with United Nations Resolutions and corresponding national laws {where the invoice is generated}. The seller hereby guarantees that these diamonds are conflict free and confirms adherence to the WCD SoW Guidelines.”

Our Expectations

- Compliance with the **Kimberley Process Certification Scheme** and related laws; diamonds must be conflict free and accompanied by written guarantees in line with the **World Diamond Council System of Warranties Assurance**.
- A **policy** and **procedures** to ensure laboratory-grown diamonds, treated diamonds, and diamond stimulants are fully disclosed at all times.
- Operational procedures in place for the responsible handling, storage and transportation of diamonds across all points in your facilities.
- A robust protocol for testing polished diamonds for undisclosed synthetic diamonds, which is documented and accessible to us, our clients and other stakeholders.

Our Focus Areas

- Complying with international laws and industry regulations.
- Regular auditing and reconciliation of warranty records and invoices, as well as invoices issued when buying or selling diamonds.
- Ensuring claims are truthful and substantiated – we take a zero-tolerance approach to misleading product representation.



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SUSTAINABLE PROCUREMENT – LABORATORY GROWN DIAMONDS



Laboratory-grown diamonds can claim certain environmental and traceability advantages over natural diamonds, however, claims can vary significantly depending on production methods - particularly energy sources and manufacturing efficiency.

All environmental claims about lab-grown diamonds must be supported with verifiable information, such as carbon emissions, energy use, and lifecycle impacts.

Suppliers must also take every precaution to ensure laboratory grown diamonds are completely segregated from natural diamonds at all times and at every stage of the supply chain and delivery process.

Our Expectations

- Suppliers of laboratory- grown diamonds, or jewellery incorporating laboratory grown diamonds.
- Lab-grown diamonds must be clearly, consistently, and unambiguously disclosed as laboratory grown.
- All lab-grown diamonds must be accompanied by documentation that explicitly states their laboratory-grown origin.
- Accompanying documentation specifying the growth method (where known) particularly:
 - CVD (Chemical Vapour Deposition)
 - HPHT (High Pressure High Temperature)
- A policy and procedures to ensure laboratory-grown diamonds, treated diamonds, and diamond stimulants are fully disclosed at all times.
- Evidence of ooperational procedures for the handling, storage and transportation of diamonds across all points in your facilities.
- A robust protocol for testing diamonds for undisclosed synthetic diamonds, which is documented and accessible to us, our clients and other stakeholders.
- See our Supplier Operating Manual for more information.

Our Focus Areas

- Complying with international laws and industry regulations.
- Regular auditing and reconciliation of warranty records and invoices, as well as invoices issued when buying or selling laboratory grown diamonds.
- Ensuring claims are truthful and substantiated – we take a zero-tolerance approach to misleading product representation.

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We support the development and implementation of new technologies and practices that promote environmental, social and economic sustainability.

This includes renewable energy, electric and hybrid vehicles, green building technology, water conservation and treatment, smart grid and energy storage, circular economy business models, machine learning and sustainable procurement practices to address global challenges such as climate change, resource scarcity and social inequality.

We welcome developments in products, services or processes that can generate shared value and long-term environmental and social benefits.

Digital transformation can create new business opportunities, reduce operating costs and improve the competitiveness of organisations. However, technological advancement can also present challenges to society and the environment and must be managed.

Our Expectations

- Share knowledge and resources with peers, research institutions and government organisations, and work together to develop and implement sustainable innovations.
- Help us promote sustainable innovation by providing information and colleague training in relation to products with environmental or social benefits.
- Set ambitious Research and Development (R&D) goals and targets where feasible, and consider publicly reporting on progress to help drive developments and engage clients.

WE WELCOME DEVELOPMENTS
IN PRODUCTS, SERVICES
OR PROCESSES THAT CAN
GENERATE SHARED VALUE AND
LONG TERM BENEFITS

Our Focus Areas

- Incorporating sustainability criteria into our procurement processes.
- Seeking products/services with a lower environmental impact, and/or that are produced by partners with strong sustainability practices.
- Promoting advancements in eco-design in our product range and packaging.
- Equipping colleagues with the information and training they need to explain product developments to clients.
- Adopting technological innovations to support supply chain management and the transition to a lower carbon, more energy efficient operation.
- Helping supplier partners improve their sustainability performance and practices.

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PRODUCT INFORMATION AND GREEN CLAIMS



Product disclosure helps to build trust and is an important aspect of consumer protection and fair business practices.

In line with our goal to help clients make more informed purchasing decisions and protect them from any negative consequences or disappointment, we encourage supplier partners to provide detailed, accurate information about a product’s features, origins and materials, as well as any potential health and safety risks.

Product information or ‘labelling’ is encouraged as a way of providing clients with information such as packaging recyclability, or the presence of potentially hazardous materials.

Labelling can also help clients and sales colleagues easily identify the country of manufacture, origin of raw materials, and the environmental impact of individual products.

Our Expectations

- Compliance with internationally accepted standards and existing obligations under consumer protection law, safety legislation and green claims directives.
- Provenance claims should be truthful, accurate, clear, unambiguous and substantiated with evidence, with any comparisons fair and meaningful.
- Provision of comprehensive details about the origin of products, where possible, including raw materials, certification claims and other socially responsible processes and practices.
- Environmental claims should consider the full life cycle of component parts or products.

Our Focus Areas

- Equipping relevant colleagues with training and information to help clients make more informed purchasing decisions.
- Requiring evidence of provenance claims and communicating them clearly and comprehensively.
- Promoting the verifiable sustainable attributes of the products we sell and services we offer.
- Providing further details about claims and their verification at point of sale.



WE WANT TO **HELP CLIENTS MAKE MORE INFORMED CHOICES**

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PACKAGING AND PRODUCT ‘LABELLING’

Packaging, produced using circular economy principles of reclaim, reuse and recycle, can help reduce waste, conserve resources and minimise pollution. It can also enhance client satisfaction.

We use packaging for wholesale distribution, retail shopping bags as presentation boxes for watches and jewellery.

While high quality, durable packaging is necessary to protect our products, we are limiting excess packaging and using materials that are sustainably sourced, recyclable and easily separated wherever possible.

Where appropriate, clients are asked if they would prefer to keep and reuse presentation boxes to minimise any ‘end-of-life’ environmental impact.

Information such as packaging recyclability, or the presence of potentially hazardous materials should be clearly visible.

Product ‘labelling’ can take many forms and is a way of providing clients with information to help them make more informed purchasing decisions. Clear, credible, product information can also help us understand how best to market and promote products.

Our Expectations	Our Focus Areas
- Compliance with relevant national and international laws and regulations. - Optimise packaging and consider using materials reclaimed from recycling as well as recyclable packaging. - Use certified materials via recognised schemes, for example, the Forestry Stewardship Council (FSC). - Consider product ‘labelling’ for full transparency of any environmental benefits of a product or service, for example, the recyclability of packaging, country of manufacture, origin of materials and full life cycle carbon emissions. - Record the total and individual weight of packaging materials and % of materials made from recyclable or renewable materials.	- Helping clients make more sustainable purchasing decisions through improved product knowledge. - Reducing excessive packaging, eliminating unnecessary single use plastics, and introducing more sustainable materials. - Measuring, recording, monitoring and reporting packaging volumes and the materials they contain. - Transitioning to fully recyclable own brand packaging where possible.



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EVENTS AND PRINTED MATERIALS

Events are an important way to create ‘WOW’ moments, build client and colleague relationships, and showcase products.

The sustainability and accessibility of event venues are assessed as part of our planning process, along with any collateral and resources used.

As part of our assessment, we consider the environmental impact from transportation, energy use, and waste generation – as well as any risks of modern slavery, as temporary, low-skilled jobs are more likely to attract vulnerable workers.



Our Expectations

- Clear justification for the event and consideration of environmental and social factors in the planning stages.
- Compliance with all applicable national and international laws and regulations.
- Reduce energy and waste by minimising consumption and using resources efficiently and productively.
- Promote sustainable transport options to reduce the environmental impact of travel where possible.
- Consider holding a carbon-neutral event by participating in carbon credit schemes to offset the carbon produced.
- If printed materials are necessary, use paper sourced through the FSC Chain of Custody Certification or the Programme for the Endorsement of Forest Certification (PEFC) for printed materials.
- Consider zero waste catering, seasonal produce and local suppliers.

ENSURING OUR
EVENTS ARE
ENVIRONMENTALLY
AND SOCIALLY
RESPONSIBLE IS AN
IMPORTANT PART
OF OUR EVENTS
PLANNING PROCESS

Our Focus Areas

- Understanding and reducing the environmental and social impact of individual events.
- Avoiding printed materials in favour of more sustainable alternatives.



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“BUILDING AN ETHICAL AND RESPONSIBLE SUPPLY CHAIN IS THE RIGHT THING TO DO FOR A BETTER FUTURE. ALIGNING AND ENSURING HIGHER SOCIAL STANDARDS IN PARTICULAR CONTRIBUTES TO BUILDING TRUST, RESILIENCE AND STABILITY WHICH DRIVES INNOVATION, PERFORMANCE AND CREATIVITY.”

Jim Crichton, Global Buying & Merchandising Director



SOCIAL: OUR APPROACH

Our clients expect everything they buy from us to be sourced responsibly, from a supply chain free from exploitation and forced labour.

We take our duty to all our stakeholders - and wider society - extremely seriously and have policies and procedures in place to make sure everyone we do business with, shares our commitment to a safe, fair, working environment, where human rights are respected and protected.

‘Social’ criteria is built into our tender processes and contractual terms, and we engage with supplier partners and other stakeholders to ensure that workers are equipped with the necessary training to ensure business is conducted responsibly, in a fair and ethical manner with the highest levels of integrity.

Caring for our communities - including our supplier community - is a key component of our company Purpose, and we support activities, and welcome opportunities, that contribute to lasting social and economic wellbeing.



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Treating people with respect is a fundamental value of Watches of Switzerland Group.

Our **Human Rights Policy** sets out how we strive to respect, protect and promote the enjoyment of human rights in all our interactions and relationships.

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 **ETI Base Code**, **OECD Guidelines for Multinational Enterprises** and the **International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work**.

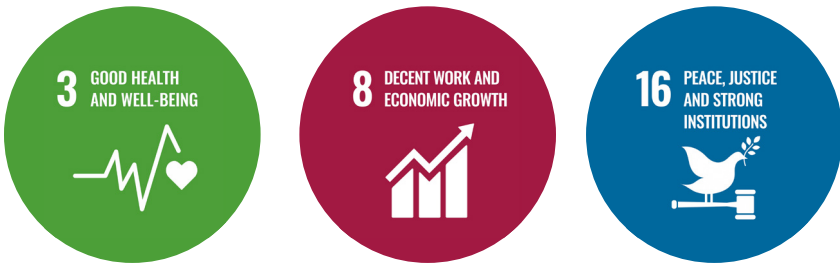
We will not tolerate human rights abuses against anyone working for our Group, or individuals or groups in any way associated with our business.

Our Expectations

- Compliance with relevant national and international laws and regulations.
- Signed acceptance of our **Vendor Code of Conduct** or an equivalent commitment that is publicly available.
- A **Human Rights Policy** or equivalent commitment to respecting human rights within your business operations and relationships, supported by procedures for implementing the policy and due diligence processes to identify, prevent, mitigate and address instead of accounting for adverse human rights impacts connected to your business.
- All suppliers of watches and jewellery are required to adopt and implement the **OECD 5 Step framework**, which includes embedding strong management systems, risk assessments and third-party audits.
- Ensure your employees know how to raise a human rights concern through your organisation's reporting channels, policies and/or procedures. Concerns can also be raised directly to the Watches of Switzerland Group through your key business contact or via Safecall's secure web reporting facility which is **available in multiple languages here**.

Our Focus Areas

- Assessing our impact on human rights in our operations and supply chain.
- Taking action to mitigate human rights risks in our operations and supply chain.
- Ensuring grievance mechanisms, including a confidential whistleblowing reporting process, are in place for everyone we impact to raise concerns.
- Remedying any adverse human rights impacts we cause, contribute to, or are linked with, and communicating our progress to stakeholders.



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MODERN SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring nobody involved in the production, distribution or sale of our products is a victim of any form of modern slavery or human trafficking.

With an estimated 50 million victims worldwide, modern slavery is one of the biggest, most complex issues we face today.

Modern Slavery includes:

- **SEXUAL EXPLOITATION** – a person is subject to sexual abuse and/or forced prostitution.
- **FORCED LABOUR** – a person coerced to work under the threat of some sort of punishment or compulsion.
- **BONDED LABOUR** - Work provided to repay a debt
- **DOMESTIC SERVITUDE** - a person exercises (perceived) power of ownership over another.
- **CHILD LABOUR** – a child working in any economic activities.

Modern slavery is often a result of **HUMAN TRAFFICKING**, where a person arranges the travel of another person into a situation of exploitation.

We monitor all current and emerging human rights related regulations including the UK Modern Slavery Act 2015 and ensure that our policies and practices evolve accordingly.

Our Expectations

- Compliance with relevant national and international laws and regulations.
- Do not engage in, or support, the use of modern slavery or human trafficking in any form.
- Have robust due diligence policies and processes in relation to identifying, preventing and dealing with instances of modern slavery and human trafficking in your business and supply chain.
- Inform us if your business identifies instances of modern slavery.
- Ensure relevant workers are trained in how to spot signs of modern slavery.
- Ensure workers have access to, and are aware of, how to report incidents of modern slavery.

HOW TO REPORT A CONCERN

Anyone with genuine suspicions about any wrongdoing, or malpractice, within the Watches of Switzerland Group, or that impacts the Group, is encouraged to report their concerns to their key business contact or through our independent third-party facility Safecall (available in multiple languages).



www.safecall.co.uk/report



WE TAKE **ALLEGATIONS OF MODERN SLAVERY** IN ALL ITS FORMS **EXTREMELY SERIOUSLY.**

Our Focus Areas

- Publicly disclosing an annual **Modern Slavery Transparency Statement** setting out the steps we are taking to ensure modern slavery is not taking place in any part of our business or supply chain.
- Improving awareness of the potential of modern slavery and human exploitation in our operation and supply chain.
- Promoting ethical business practices and policies that protect workers from being abused and exploited in our organisation and global supply chain.
- Ensuring robust due diligence processes in relation to slavery and human trafficking are in place across our business and supply chain.

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HUMAN RIGHTS PRINCIPLES



Our Vendor Code of Conduct requires supplier partners to accept the following human rights principles, or publish an equivalent commitment.

EMPLOYMENT IS FREELY CHOSEN	No forced, bonded or involuntary labour. Workers should not be required to lodge 'deposits' or identity papers and be free to leave employment after reasonable notice.
FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED	- Workers should have a right to join or form trade unions and bargain collectively. - Employers have an open attitude towards the organisational activities of trade unions. - Workers' representatives are able to carry out their representative functions without discrimination. - If restricted under law, employers should not hinder the development of an equivalent means for independent and free association.
WORKING CONDITIONS ARE SAFE AND HYGIENIC	- Provide a safe and hygienic working environment, with steps taken to minimise hazards and prevent accidents and injury. - Provide regular, recorded health and safety training for all employees. - Provide access to clean toilet facilities and potable water, along with facilities for food storage where appropriate. - Where provided, clean, safe accommodation that meets workers' basic needs. - Assign senior management responsibility for health and safety and compliance with all applicable health and safety laws.
CHILD LABOUR SHALL NOT BE USED	- Employing forced or child labour is strictly against our terms of operation (a child being a person of an age required by relevant law to attend compulsory schooling). - Should any child be found to be performing child labour, partners shall provide for the child to attend and remain in quality education until no longer a child. - Young persons under 18 shall not be employed at night or in hazardous conditions. - Employers should conform to relevant International Labour Organisation's standards.
LIVING WAGES ARE PAID	- Wages and benefits must meet national legal standards or industry benchmark standards and be enough to meet basic needs, as well as some discretionary income. - All workers should receive clear, written information with respect to wages and pay periods before employment and each time they are paid. - Deductions should not be made from wages as a disciplinary measure, nor deductions outside of national law should be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded in writing.
WORKING HOURS ARE NOT EXCESSIVE	Working hours should comply with national laws and industry standards, whichever gives greater protection. Workers should not work in excess of 48 hours per week unless in exceptional circumstances. They should have at least one day off for every 7 day period on average. Overtime should not exceed 12 hours per week (in excess of normal, full-time hours) and be voluntary on an exceptional basis. Work in excess of standard full-time hours should always be compensated at a premium rate.
NO DISCRIMINATION IS PRACTICED	No discrimination in hiring, terms and conditions of engagement or employment, working conditions, compensation, access to training, promotion, termination or retirement based on race, colour, caste, national origin, nationality, religion or belief, age, disability, gender (including gender reassignment), marital status (including civil partnership status or local equivalent), sexual orientation, pregnancy or maternity, union membership or political affiliation.
REGULAR EMPLOYMENT IS PROVIDED	- Work should be based on a recognised employment relationship established through national law and practice and by reference to any relevant industry standards. - Obligations to employees or workers 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, subcontracting, 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.
NO HARSH OR INHUMANE TREATMENT IS ALLOWED	A strictly zero tolerance approach to physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

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HEALTH, SAFETY AND WELLBEING



We are cultivating a safer, happier, healthier and more productive workforce with optimum levels of energy and resilience.

Our **Group Health and Safety Policy** covers all our facilities and operations and sets out our commitment to preventing and maintaining a safe working environment.

We carry out regular risk assessments to identify and evaluate the potential impacts of operational tasks or conditions and implement measures to prevent accidents and cases of work-related ill health.

Colleagues receive relevant training in relation to safe working practices and have access to a range of benefits to support better mental and physical health and wellbeing, including childcare vouchers, eye care vouchers and dental plans.

IT IS **IMPORTANT** TO CARRY OUT **REGULAR** HEALTH AND SAFETY **RISK ASSESSMENTS**.

Our Expectations	Our Focus Areas
- Compliance with all applicable laws and relevant, recognised international health and safety standards. - Signed acceptance of our Vendor Code of Conduct or an equivalent commitment that is publicly available. - A public Health and Safety Policy or formal commitment to providing a safe and hygienic working environment across all your facilities and operations. - Mechanisms to ensure the effective implementation of your health and safety policy and procedures, which are reviewed at least annually. - Develop, maintain and regularly test (through drills and emergency response exercises, at least annually) emergency response plans.	- Providing a safe, happy and healthy working environment for colleagues. - Ensuring everyone we do business with formally accepts the principles of our Vendor Code of Conduct in writing or has an equivalent published commitment. - Mitigating against health and safety risks within our value chain.



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The popularity and media profile of high-end luxury timepieces may pose an increased threat to the safety and security of colleagues, clients and other stakeholders.

At all levels of the jewellery supply chain, where high-value precious stones and metals are known to be a target for criminals, the risks to personal safety and property require responsible security measures.

We regularly assess all risks to safety and security and have established measures to protect colleagues, contractors, visitors, and personnel engaged by relevant business partners, against product theft, damage or substitution of products within our retail premises and during events, exhibitions and shipments.

Our **Security Processes and Procedures** detail our commitment to ‘protecting people over product’ and outline the measures we take to prioritise safety. This is supported by training for relevant colleagues, internal control procedures, and security arrangements to protect colleagues during shipment and in transportation.

APPROPRIATE STEPS MUST
BE TAKEN TO PRIORITISE
PEOPLE’S SAFETY

Our Expectations

- Take appropriate steps to prioritise safety.
- For high risk sites, risk assessments must be conducted in line with the **Voluntary Principles on Security and Human Rights** - www.voluntaryprinciples.org
- Private security services partners must have relevant certifications e.g. membership of the **International Code of Conduct Association (ICoCA)** for private security services to the jewellery supply chain.

Our Focus Areas

- Protecting colleagues and clients against threats to security and theft.
- Protecting electronic and physical information from unauthorised access, processing, modification or destruction in line with all relevant international law and legislation.



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Digital security is essential to sustain trust in our increasingly digitally dependent economies, and to increase resilience in a world subject to growing geopolitical conflicts and cybercrime.

Our [Data Protection and Information Security Statement](#) outlines our approach to data protection and cyber security. We have a framework of measures governing the way we handle data and our cyber security team focuses on protecting the digital networks and systems that collect, transmit, process, and store information.

We are creating an internal culture where all colleagues understand the importance of data protection to clients, fellow colleagues, and our business, and make it a part of their everyday behaviour. This encourages shared accountability for safeguarding personal data.

We share data with third parties only where we have a valid legal basis for doing so.

We also conduct due diligence on supplier partners to ensure that they can and will handle our data securely and appropriately, and we include the relevant legal provisions in our contracts.

Our Expectations

- Compliance with applicable law and regulation in the countries in which you operate and offer services.
- A data privacy policy compliant with applicable regulations such as GDPR, UK GDPR and CCPA, and which is actively implemented across your business, with systems, networks, products and processes demonstrably compliant with all aspects of data privacy law.
- Designated senior responsibility within your organisation for both data privacy and cyber security.
- Established processes and measures for identifying and managing new and emerging risks, mitigating vulnerabilities and handling data breaches.
- An IT Disaster Recovery or Incident Recovery Plan which covers all IT Infrastructure, applications and systems required to deliver your services to the Watches of Switzerland Group.
- Employees should be regularly trained in data protection and cyber security.
- Where relevant, hold cyber security certifications e.g. ISO 27001, NIST, SOC 2, etc.
- Regular information security audits must be conducted.

THE FAIR, LAWFUL AND APPROPRIATE USE OF PERSONAL DATA IS **EVER MORE IMPORTANT AS TECHNOLOGY AND BUSINESS PRACTICE EVOLVE AT A RAPID PACE**

Our Focus Areas

- Protecting electronic and physical information from unauthorised access, processing, modification, loss or destruction in line with all relevant international law and legislation.
- Protecting personal data against unauthorised, inappropriate, unfair or unlawful use of their personal data, in line with applicable data privacy law.

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Discrimination at work creates and reinforces inequalities and is a breach of human rights.

We are creating an inclusive environment where everyone who can make a valuable contribution is welcome to join our team.

We do not practise or condone any form of discrimination in the workplace in terms of hiring, continued employment, remuneration, overtime, access to training, professional development, promotion, termination or retirement, and expect the same from everyone we do business with.

This includes discrimination based on gender; race, colour, ethnicity, caste, national origin, religion, disability or genetic information, sexual orientation, union membership, political affiliation, marital status, parental or pregnancy status, physical appearance, HIV status, age, or any other personal characteristic unrelated to the inherent requirements of the work.

EMPLOYEES WANT **JOB SECURITY, EMPLOYMENT RIGHTS AND A FAIR INCOME**, PLUS THE OPPORTUNITY FOR **PERSONAL DEVELOPMENT AND PROGRESSION** WITHIN A SUPPORTIVE AND INCLUSIVE ENVIRONMENT

Our Expectations

- ‘Fit for work’ individuals are given equal opportunities and fair treatment, and are not discriminated against on the basis of factors unrelated to their ability to perform their job.
- Written agreement with our **Human Rights Principles** contained within our **Vendor Code of Conduct**.

Our Focus Areas

- Ensuring there is no unfair discrimination in our procurement and onboarding process.
- Ensuring suppliers representing or advocating for minority groups to have equal opportunities to provide goods or services to us.
- Understanding, respecting, and protecting cultural heritage in line with human rights principles.



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A well-trained, knowledgeable and highly skilled workforce is key to running a successful and well managed business.

We are committed to ensuring everyone who works for us is equipped with the information, tools and learning resources they need to perform their job well, safely and to the highest standards.

We operate open, transparent and merit-based recruitment processes that ensure equal opportunities, and invest in a combination of classroom and online learning to continually improve colleague knowledge about the brands we partner with, the products we sell, and services we offer.

Long and short-term career goals are supported with development plans, regular performance reviews and leadership programmes to nurture our most promising talent.

Our Expectations

- Provide relevant training in a language and format workers can easily understand.
- Help equip our sales colleagues with comprehensive information about the sustainability performance of products - and/or services - and the wider social attributes of your brand or company.

Our Focus Areas

- Providing colleagues with relevant training.
- Working with partners to improve colleague product knowledge, for example, sustainability and provenance claims.

WORKERS SHOULD
RECEIVE RELEVANT
TRAINING IN A
LANGUAGE AND
FORMAT THEY CAN
EASILY UNDERSTAND.

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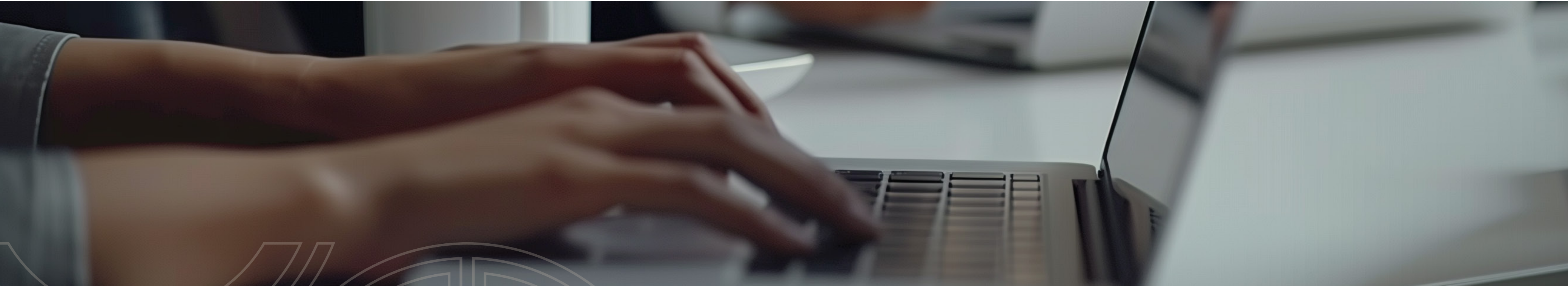
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TRAINING EXPECTATIONS

Training and information about environmental risks and controls should be given to all relevant workers in a format and language they can easily understand.

THEME	DESCRIPTION
Anti-Competitive Practices	Awareness training to prevent anti-competitive practices.
Business Ethics	Training on business ethics related issues.
Corruption and Bribery	Awareness training to prevent corruption and bribery.
Data Protection and GDPR	Training to protect electronic and physical information from unauthorised access, processing, modification or destruction.
Diamonds (See also Kimberley Process)	• Training to ensure workers who buy or sell diamonds are well informed about trade association resolutions and government restrictions prohibiting the trade in conflict diamonds. • Handling, moving or storing diamonds at facilities. • Procedures to ensure laboratory-grown diamonds, treated diamonds, and diamond simulants are fully, proactively and conspicuously disclosed at all times.
Discrimination and/or Harassment	Awareness training on discrimination and/or harassment issues.
Green Claims	Ensure workers who are responsible for implementing responsible sourcing, environmental and sustainability claims, and responding to enquiries about the claims understand them, and can explain them accurately.
Environmental Matters	Awareness and understanding of environmental matters, including hazardous waste, air emissions, wastewater, energy conservation and climate actions. Technical assistance and advice, e.g. how to use more eco-friendly processes and techniques and awareness on waste reduction and sorting.
Emergency response	Regularly test (through drills and emergency response exercises, at least annually) emergency response plans.
Harassment, Discipline, Grievance Procedures and Non-retaliation	Clear, confidential and unbiased grievance procedures and investigation processes and actively communicate these to all employees.
Health and Safety	Training to raise awareness and understanding of Health and Safety procedures and equipment use, including safely handling and managing hazardous substances. Also includes First Aid Training for relevant employees.
Information Security	Training to prevent information security breaches.
Kimberley Process	Training on government restrictions prohibiting the trade in conflict diamonds and relevant processes.
Know Your Counterparty	Training on Know Your Counterparty (KYC) policy and procedures for partners and buyers of gold, silver, PGM, diamonds, coloured gemstones or jewellery products containing these materials.
Labour and Human Rights	Training on how to identify victims of workplace violence who may not feel safe reporting incidents through the grievance procedures.
Modern Slavery and Human Rights	Training on human rights, how to identify victims of modern slavery and how to report suspected incidents.
Skills-related training	Training relevant to carrying out a specific role or tasks.
Sustainable Purchasing	Awareness and understanding of social and environmental issues when procuring products.
Whistleblowing	Training on how to report legitimate concerns about suspected wrongdoing, misconduct or malpractice connected to the company they work for.

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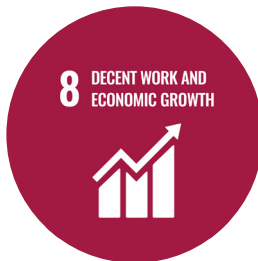
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Making a positive social impact can be good for business by improving workforce recruitment and retention, enhancing brand reputation and earning colleague loyalty.

Caring for our communities is a key component of our Company Purpose and we engage with stakeholders who are local to our operations with the aim of supporting activities that contribute to lasting social and economic wellbeing.

We are committed to promoting local social and economic development, including optimising the impact of our operations, promoting the employment and training of local people, and reducing the social and environmental impacts related to site closures, openings, and restructuring.

Our Expectations	Our Focus Areas
- Seek to support the social, economic and institutional development of the communities in which you operate, including community initiatives. - Respect the rights of Indigenous peoples as articulated and defined in applicable local, national and international laws and their social, cultural, environmental and economic interests, including their connection with lands and waters. - Where applicable, consult with protected area sponsors, managers and affected people or groups to ensure your activities do not negatively impact these areas. - Consider partnering with us on initiatives to address local issues.	- Caring for our communities, including our supplier community. - Collaborating with stakeholders to make a positive social impact.

WE WANT TO PLAY **AN ACTIVE ROLE** IN OUR COMMUNITIES IN A WAY STAKEHOLDERS CAN **CONNECT WITH** AND FEEL **PROUD OF**.

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“GOOD GOVERNANCE ENABLES
CLEAR, STRATEGIC DIRECTION AND
HELPS MAINTAIN A TRANSPARENT,
LEGAL AND ETHICAL ENVIRONMENT
THAT REDUCES BUSINESS RISK,
ENHANCES VALUE, AND PROMOTES
THE INTERESTS OF STAKEHOLDERS.”

Laura Battley, Company Secretary and General Counsel



GOVERNANCE: OUR APPROACH

Our Watches of Switzerland Group Board is committed to the highest standards of environmental and social governance and oversees a number of mechanisms to advance Environmental, Social and Governance (ESG) priorities and address sustainability risks.

The Board meets regularly and is supported by an ESG Committee, and below that, an ESG Steering Group comprised of executive level leaders, each with formal operational responsibility for environmental, social and governance issues.

In addition, a number of key colleague leads and experts champion sustainable business practices through dedicated ESG Working Groups.

Compliance with these Supplier Sustainability Standards is supported by a number of documents and procedures.

SUPPORTING DOCUMENTS 		
Anti-Trust and Competition Law Policy	Data Protection and Information Security Policy Statement	Anti-Facilitation of Tax Evasion Policy
Anti-Money Laundering Policy	Environment Policy	Operational Risk Manual
Business Continuity Plan	Employee Handbook	Supplier Sustainability Standards
Conflict Minerals Policy (See Vendor Code of Conduct)	Health and Safety Policy	Vendor Code of Conduct
Board Diversity and Inclusion Policy	Human Rights Policy	Whistleblowing Policy
Code of Ethics	Modern Slavery Transparency Statement	Anti-Trust and Competition Law Policy



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We run our business operations to the highest ethical and professional standards and have policies and processes in place to identify and mitigate against risk.

BUSINESS RISK	WHAT WE EXPECT FROM OUR PARTNERS	WATCHES OF SWITZERLAND GROUP COMMITMENT
Corruption	A commitment to prevent offering, promising, giving, accepting or soliciting an advantage as an inducement for an action which is illegal, unethical or a breach of trust.	Anti-Bribery, Corruption and Fraud Prevention Policy
Conflict of interest	A commitment to prevent a situation where an individual or the entity for which they work is confronted with choosing between the duties and demands of their position and their own private interests.	Code of Ethics
Fraud	A commitment to prevent offences that intentionally deceive someone to gain an unfair or illegal advantage.	Anti-Bribery, Corruption and Fraud Prevention Policy
Money laundering	A commitment to prevent concealing the origin, ownership or destination of illegally or dishonestly obtained money by hiding it within legitimate economic activities to make them appear legal.	Anti-money Laundering Policy
Anti-competitive practices	A commitment to ensure the company does not restrict competition, maintain or increase their relative market position in an abusive and dominant way.	Anti-Trust and Competition Law Policy
Information security	A commitment to ensure the secure collection, processing or storage of third-party information for business purposes.	Data Protection and Information Security Policy Statement
Tax Evasion	A commitment not to undertake tax evasion and to take reasonable procedures to prevent the facilitation of tax evasion by third parties	Anti-Facilitation of Tax Evasion Policy

Our Expectations



Embed basic business ethics principles in a Code of Conduct or similar policy, including adherence to local laws and regulations.



Have systems in place to maintain awareness of, and ensure compliance with, applicable law and maintain the highest ethical standards.



Prohibit all forms of corruption and comply with national and international sanctions policy and legislation.



Have reasonable and lawful payment policies with your own suppliers and subcontractors.

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To manage and monitor compliance and performance, colleagues with a responsibility for sourcing are trained to assess environmental and social risks and identify collaborative opportunities.

We use a number of tools to support due diligence, including machine learning technology, smart automation and analytics to assess the level of alignment with our sustainability standards.

Risks are calculated by a number of factors, including the type of goods or services supplied, geographic location and criticality to our business and reputation.

Suppliers deemed ‘High Risk’ may be subject to an **on-site independent audit and corrective action plan** and/or asked to provide evidence of recent, independent site audits.

Our Expectations	Our Focus Areas
- Formal, written agreement with our Vendor Code of Conduct or have an equivalent publicly available commitment. - Alignment with relevant internationally recognised certifications and standards. - A due diligence management system aligned with requirements in relation to human rights, environmental and responsible sourcing requirements, for example, Know Your Counterparty, the Kimberley Process Certification Scheme and the World Diamond Council System of Warrantees.	- Screening new suppliers to ensure they are legitimate and have not been implicated in money laundering, financing of terrorism, fraud or serious human rights abuses, and are not subject to sanctions. - Implementing and upholding effective controls to ensure all partners adhere to the highest environmental and social standards.

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On-site audits help us to safeguard the integrity and reputation of our business operation and partnerships.

Any partner not exempted from an onsite assessment in the vendor qualification process, may be asked to undergo an audit to support compliance with our **Vendor Code of Conduct** and the identification of risks relating to regulatory requirements and brand reputation.

Our audits are carried out by specialist independent auditors with expert knowledge of local laws and practices. They assess facilities against over 200 indicators consistent with our terms and conditions and produce a report with a **Low, Intermediate, High** or **Critical Risk** classification.

Evidence of recent, relevant, credible, third-party audit reports may also be accepted as part of our due diligence procedures.

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

We Expect

The following commitments from our partners:

- Undertake supply chain due diligence and risk management consistent with your supply chain policy and our terms and conditions.
- Cooperate with our auditors, allowing them access to all areas of your production site, relevant documentation and randomly selected workers for interviews - refusal to fully cooperate will result in a failed assessment.
- Verification of the implementation of any corrective actions as per the jointly agreed upon 'Summary of Findings' worksheet to remain a partner with us.
- Have a complaints and grievance mechanism in place, for responding to requests for information and raising and resolving issues.

Our Focus Areas

- Building long-term relationships with our partners and collaborating to resolve issues.
- Carrying out independent audits of sites deemed the highest risk.
- Training colleagues to carry out partner facilities visits to check compliance with our **Vendor Code of Conduct**, in addition to third party audits.

WE USE SPECIALIST
INDEPENDENT AUDITORS
WITH EXPERT KNOWLEDGE
OF LOCAL LAWS AND
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REPORTING A CONCERN TO THE WATCHES OF SWITZERLAND GROUP

We are proud of our reputation for conducting business in an ethical and socially responsible way and believe that when faced with difficult choices, we should always do our best to do the right thing in accordance with our Purpose and Values.

Anyone with genuine suspicions about any wrongdoing, or malpractice within the Watches of Switzerland Group, or that impacts the Group, is encouraged to report their concerns as soon as possible.

We Expect

- Anyone with genuine suspicions about any wrongdoing, or malpractice, within the Watches of Switzerland Group, or that impacts the Group, is encouraged to report their concerns to the contacts below, or through the independent third party facility, Safecall (available in multiple languages) www.safecall.co.uk/report.

Our Focus Areas

- Implementing and upholding effective controls to ensure all ensure all supplier partners adhere to the highest environment and social standards.
- Ensuring colleagues and relevant third parties understand how concerns about compliance with our **Vendor Code of Conduct** can be reported.

USEFUL CONTACT DETAILS

WATCHES OF SWITZERLAND GROUP		EXTERNAL	
Philippa Jackson Executive Director, Human Resources	+44 (0) 7818 102165 p.jackson@thewosgroup.com	Safecall	0800 915 1571 www.safecall.co.uk/report
Mark Haworth (UK), Senior Legal Counsel	+44 (0)116 281 7261 m.haworth@thewosgroup.com	Protect – Whistleblowing charity	+44 (0)203 117 2520
Shirley Good Ingold (US), Vice President, HR and L&D	+1 954 590-9496 singold@thewosgroup.com		
Andrew Raey, Director of Audit & Risk	+44 (0)7976 259228 a.raey@thewosgroup.com		
Laura Battley, Company Secretary and General Counsel	+44 (0) 207 317 4600 l.battley@thewosgroup.com		

WE WANT ANYONE WITH A CONCERN TO FEEL CONFIDENT TO DO THIS, SO WE GUARANTEE ALL INFORMATION RECEIVED IS TREATED SERIOUSLY AND CONFIDENTIALLY. WE PROMISE TO WORK QUICKLY TO ADDRESS THE MATTER.

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ALIGNMENT WITH WELL-RECOGNISED ENVIRONMENTAL SUSTAINABILITY STANDARDS AND CERTIFICATIONS

All partners must maintain awareness of - and compliance with - all applicable national and international environmental laws and regulations. In addition, they are strongly encouraged to align with relevant, well-recognised sustainability standards and certifications - as well as adhering to external initiatives or sets of principles:

THEME	DESCRIPTION
<u>Science Based Targets (SBTs)</u>	Science Based Targets are a framework to help set carbon emission reduction targets consistent with limiting global temperature rise to 1.5°C in line with climate science to avoid the worst impacts of climate change. This includes the guidance, criteria, and recommendations to help companies set targets to reach net zero.
<u>United Nations Sustainable Development Goals (SDGs)</u>	The UN SDGs define 17 global challenges and provide a framework to help governments, businesses and communities all over the world to prioritise and mobilise efforts to achieve related targets by 2030. Leading organisations and businesses are strategically aligned with supporting these Goals, which include tackling climate change, promoting responsible production and consumption, alleviating poverty and ending inequality.
<u>EcoVadis Global Supply Chain Management Platform and Sustainability Ratings System</u>	The EcoVadis system allows businesses to evaluate their own and their supply chain's ESG performance across four main themes - Environment, Labour and Human Rights, Ethics, and Sustainable Procurement. To achieve an EcoVadis Sustainability Rating, an organisation must provide evidence against 21 indicators, based on international sustainability standards, which are then audited and scored. Find out how the Watches of Switzerland Group is partnering with EcoVadis to promote best practice and identify and support Partners most at risk of contravening our Vendor Code of Conduct.
<u>CDP (Carbon Disclosure Programme)</u>	CDP is the world's largest voluntary reporting framework for disclosing environmental information to stakeholders. The CDP questionnaire on Climate Change is aligned to the Task Force for Climate Related Financial Disclosures (TCFD) and requires organisations to explain how they are mitigating and managing climate related risks. It involves responding to an annual questionnaire via a portal.
<u>BREEAM, LEED or equivalent building certification scheme.</u>	BREEAM (Building Research Establishment Environmental Assessment Method) aims to reduce the negative effects of construction and development on the environment and involves an independent building assessment to evaluate energy and water use, health and wellbeing, pollution, transport, materials, waste, ecology and management processes. It provides a framework to help owners, occupiers and designers adopt sustainable solutions while providing market recognition with buildings rated and certified on a scale of 'Pass', 'Good', 'Very Good', 'Excellent' and 'Outstanding'. LEED (Leadership in Energy and Environmental Design) is a US equivalent of BREEAM, run by the non-profit US Green Building Council (USGBC).
<u>United Nations Global Compact</u>	The world's largest sustainability initiative aims to mobilise companies and stakeholders to align with 10 principals on human rights, labour, environment and anti- corruption. Signatories commit to taking strategic actions to advance broader societal goals, such as the UN Sustainable Development Goals , with an emphasis on collaboration and innovation.
<u>International Organisation for Standardisation (ISO) Standards.</u>	ISO certification shows adherence to global standards and can help optimise business practices and establish credibility and trust. Common ISO Standards include ISO 14000s for Environmental Management, ISO 26000 for Social Responsibility, ISO 3100 for Risk Management, ISO 5001 for Energy Management and ISO 20121 for Sustainable Events. BS OHSAS 18001 has been replaced by ISO 45001 the new international standard for occupational health and safety management. ISO 14020:20001 on general principles for environmental labels and declarations.
<u>Forest Stewardship Council (FSC) Standards</u>	The Forest Stewardship Council (FSC) sets the standard for responsible forest stewardship. These include safeguards to ensure stakeholders throughout the forest supply chain live up to the principles that protect healthy and resilient forests for all, forever. Wood and paper products supplied to the Watches of Switzerland Group should comply with the FSC Standard or equivalent.
<u>Waste Electrical and Electronic Equipment Directive (WEEE Directive)</u>	The WEEE Directive aims to reduce the amount of electrical and electronic equipment being produced and to encourage everyone to reuse, recycle and recover it. Businesses that import or manufacture new electrical or electronic equipment may need to comply with the UK and EU WEEE Regulations. Partners who need to comply must register on a producer compliance scheme. Quartz watches, and any other products requiring a battery, are subject to WEEE regulations and Partners must conform where required by the regulations.

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ALIGNMENT WITH RECOGNISED SUSTAINABILITY STANDARDS & CERTIFICATIONS: WATCHES AND JEWELLERY

THEME	DESCRIPTION
Responsible Jewellery Council (RJC) Code of Practices Certification	The RJC Code of Practices is designed to improve ethical, social, human rights and environmental conditions. It provides a common Industry standard for responsible business practices from mine to retail. It builds on and supports international standards and development goals and applies to gold, silver, PGM, diamond and coloured gemstone supply chains. Accreditation requires third-party auditing and is mandatory for all RJC members.
Responsible Jewellery Council Chain of Custody	The RJC Chain of Custody Standard defines an approach for how to handle and trade gold and platinum group metals in a way that is fully traceable and responsibly sourced. Chain-of-custody (CoC) certification is voluntary and complements certification against the RJC's Code of Practices, which is mandatory for all RJC members.
London Bullion Market Association (LBMA) Good Delivery List and UAE Good Gold Delivery Scheme	Only refiners whose bars have been accredited by LBMA as meeting the exacting standards for trading on the global market appear in the Good Delivery List. All precious metals supplied to the Watches of Switzerland Group must demonstrate legal compliance according to all the provisions of the financial market supervisory authority and be sourced from refineries on the LBMA Good Delivery List or the UAE Good Gold Delivery Scheme, which is in line with international best practices and covers quality and technical specifications of refineries and gold production facilities in the UAE.
World Gold Council Conflict-Free Gold Standard	Developed by the World Gold Council and based upon internationally-recognised benchmarks, the World Gold Council Conflict-Free Gold Standard® helps companies to provide assurance that their gold is not contributing to conflict. The Standard helps to “operationalise” the OECD's Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas .
Organisation For Economic Co-operation And Development (OECD) Due Diligence Guidance	The OECD Due Diligence Guidance is a risk-based approach to help organisations avoid contributing to conflict, serious human rights impacts and financial crime through their operations or mineral sourcing practices. We require all Partners of watches and jewellery to adopt and implement the OECD 5-Step framework which is a set of guidelines developed by the Organisation for Economic Co-operation and Development (OECD) to help companies identify, prevent and address adverse impacts on human rights linked to their business operations and relationships.
Kimberley Process Certification Scheme (KPCS) and the World Diamond Council System of Warranties Assurance (WDC SoW)	All Partners of diamonds, or jewellery incorporating diamonds to the Watches of Switzerland Group, must comply with KPCS, as well as all laws in relation to this scheme and the WDC SoW. Diamonds must be conflict free and accompanied by written guarantees in line with WDC SoW Assurance. We will not accept invoices without this statement. When a diamond is imported and ready for trade, we also require a WDC SoW Assurance statement on every invoice for rough and polished diamonds and diamond jewellery, through to the final invoice to clients. Records of warranty invoices and invoices issued when buying or selling diamonds, are audited and reconciled on an annual basis. The World Diamond Council - www.worlddiamondcouncil.org provides useful information on The Kimberly Process Certification Scheme.
The Convention on International Trade in Endangered Species (CITES)	CITES is an international agreement between governments which aims to ensure international trade in specimens of wild animals and plants does not threaten the survival of the species. Partners to the Watches of Switzerland Group must provide written confirmation that any animal skins used to make products are sourced from farmed and sustainably managed sources and conform to relevant international laws, including CITES. Products affected by CITES regulations require pre-authorisation prior to importing into the UK. All such products will require an export certificate from the sending country. It is the responsibility of Partners of products affected by CITES regulations to ensure the requisite licences are obtained and maintained
Task Force for Nature-related Financial Disclosures	The Taskforce on Nature-related Financial Disclosures (TNFD) has developed a set of disclosure recommendations and guidance that encourage and enable business and finance to assess, report and act on their nature-related dependencies, impacts, risks and opportunities.
Watch and Jewellery Initiative 2030	Guided by the principles of the UN Global Compact and 17 Sustainable Development Goals, this industry movement aims to accelerate positive impact in building climate resilience, preserve resources and foster inclusiveness, with the overall aim of uniting brands to collaborate on projects that deliver impact along the value chain. Member commitments include taking action to reduce GHG emissions in line with the Science Based Targets initiative.

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THEME	DESCRIPTION
Fairmined certified gold	Fairmined is traceable gold, extracted with the best mining practices aimed at preserving the environment which supports the development of artisanal and small-scale mining communities. Fairmined certified gold comes from artisanal and small-scale mining organisations. Certification guarantees the gold has been extracted in harmony with nature, human dignity and sustainable development, contributing to the transformation of lives in these mining communities.
Fairtrade Standard for Gold and Associated Precious Metals for Artisanal and Small-Scale Mining	Fairtrade Certified Gold is the world's first independent ethical certification system for gold. The standard aims to create opportunities for artisanal and small-scale miners and their communities, by promoting the formalisation of the artisanal and small-scale mining sector through establishing membership-based artisanal and small-scale mining organisations.
Swiss Better Gold Association (SBGA)	The SBGA aims to improve working and living conditions in artisanal and small-scale gold mining communities and facilitates the creation of responsible supply chains. SBGA Members agree to buy Swiss Better Gold production and reinvest USD 1 per bought gram into the Better Gold Fund to finance environmental and social projects in and around mines.
World Gold Council Responsible Gold Mining Principles	These Principles recognise and consolidate existing standards that address specific aspects of responsible gold mining, e.g. the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the Extractive Industries Transparency Initiative. They also incorporate Guidelines for Multinational Enterprises and the International Council on Mining and Metals' (ICMM) Performance Expectations.
Global Reporting Initiative (GRI) Mining and Metals Sector Standards	GRI Standards are the most widely used sustainability reporting standards. Mining is the next sector for which a GRI Standard will be developed, with a focus on the exploration and extraction of all types of minerals, metallic and non-metallic, including quarrying. It will also focus on the primary processing of minerals and related mining activities, such as transport and storage, as well as the provision of goods and services in relation to engineering, procurement, and construction (EPC).
The Ethical Trade Initiative (ETI) Base Code	The Ethical Trading Initiative (ETI) is an alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. Their vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.
International Council on Mining and Metals (ICMM) governance framework	The ICMM Mining Principles strengthen social and environmental requirements on issues such as labour rights, resettlement, gender, access to grievance mechanisms, mine closure, pollution and waste. Implementation is supported by robust site-level validation, assurance and transparent disclosure. Aligned with the objectives of other responsible sourcing initiatives, their assurance and validation procedure reinforces commitments to transparency and supports the credibility of reported progress.
World Gold Council (Conflict-Free Gold Standard)	The World Gold Council Conflict-Free Gold Standard® helps companies to provide assurance that their gold is not contributing to conflict. The Standard helps to “operationalise” the OECD’s Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas .
Project Assure	The ASSURE Program assesses the relative performance of Diamond Verification Instruments through rigorous testing using very challenging samples sets. As new instruments are tested, the results will be published to the ASSURE 2.0 Directory
Natural Diamond Council	This not-for-profit organisation is committed to inspiring and educating consumers on the values of natural diamonds and the positive global impact of the industry. It also offers a comprehensive Education Programme for retailers and jewellery professionals.
Tracr™	Tracr™ is the world’s leading digital platform for tracing natural diamonds from source at scale, bringing the ability to explore the provenance, authenticity and the unique journey a diamond has taken along the diamond value chain.

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OTHER STANDARDS CONTINUED

THEME	DESCRIPTION
<u>International Code of Conduct Association (ICoCA)</u>	ICoCA is a multi-stakeholder initiative formed in 2013 to ensure providers of private security services respect human rights and humanitarian law. It serves as the governance and oversight mechanism of the International Code of Conduct for Private Security Service Providers (the “Code”).
<u>International Labour Organisation (ILO)</u>	International labour standards are legal instruments drawn up by the ILO’s constituents (governments, employers and workers) and setting out basic principles and rights at work. Conventions, Protocols and Recommendations are drawn up by representatives of governments, employers and workers and are adopted at the annual International Labour Conference.
<u>SA 8000 social accountability standard</u>	SA8000 standard is based on the conventions of the International Labour Organization (ILO) and the United Nations Universal Declaration of Human Rights. Many organisations are using it as a benchmark to improve their social performance, and as a tool to demonstrate their commitment to responsible business practices.
<u>United Nations Universal Declaration of Human Rights</u>	The Group supports the principles set out in the UN Universal Declaration of Human Rights and has measures in place to identify, assess and mitigate potential labour and human rights abuses across our value chain.
<u>Voluntary Principles on Security and Human Rights</u>	This is a set of guidelines for companies operating in high-risk areas to help ensure their security practices do not violate human rights. The principles were developed in 2000 by a group of governments, companies, and non-governmental organisations, and cover issues such as the use of force, access to security personnel, and the protection of human rights in the context of security operations. Companies that adhere to the principles are encouraged to conduct regular reviews of their security practices and to engage in dialogue with local communities and other stakeholders.
<u>Women’s Empowerment Principles</u>	The Women’s Empowerment Principles (WEPs) are a set of Principles offering guidance to business on how to advance gender equality and women’s empowerment in the workplace, marketplace and community. Established by the UN Global Compact and UN Women, the WEPs are informed by international labour and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women’s empowerment.

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USEFUL RESOURCES

DOCUMENT	DESCRIPTION
WOSG EMISSIONS QUESTIONNAIRE	This questionnaire lists the information we need to support our emissions reduction strategy and achievement of our net zero emissions target.
SCIENCE-BASED TARGETS COMMITMENT LETTER	Companies signing this letter, commit to working to set a science-based emission reduction target aligned with the SBTi's target-setting criteria.
WOSG MODERN SLAVERY QUESTIONNAIRE	This questionnaire provides a detailed list of questions to help us understand related risks in your business and support our supply chain due diligence.
WOSG REQUEST FOR PURCHASE FORM (Internal)	This document lists the information we require, before entering into a contractual agreement with suppliers.
KEY SUSTAINABLE BUSINESS DATA SUMMARY	This document provides a list of key data points we expect from key suppliers to support our sustainability reporting.

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RESPONSIBLE JEWELLERY COUNCIL CODE OF PRACTICES (RJC COP)

We strongly encourage relevant suppliers to become certified members of the Responsible Jewellery Council (RJC), which is a registered not-for-profit company and the world’s largest standards authority for responsible jewellery.

Achieving and retaining certified membership status involves rigorous independent audits to ensure compliance with their Code of Practices (COP) - which provides a common Industry standard for responsible business practices from mine to retail and are designed to improve ethical, social, human rights and environmental conditions.

The RJC COP builds on and supports international standards and development goals and applies to gold, silver, PGM, diamond and coloured gemstone (rubies, sapphires and emeralds) in jewellery and watch supply chains. Certification requires third-party auditing and is mandatory for all RJC commercial members.

The RJC COP can be applied to businesses of any size and:

- Provides assurance to stakeholders, shareholders, customers and business partners that a company conducts its business responsibly.
- Helps protect and enhance brands by reducing supply chain risks and vulnerabilities.
- Improves management systems and operating procedures to strengthen businesses and make them more sustainable.
- Promotes better social and environmental conditions within the broader industry, bringing positive impacts for workers, communities and environments alike.
- Adds value to products.

Sectors covered by the COP include:

- Exploration and mining
- Mineral processing
- Refining and alloying
- Cutting and polishing
- Trading, hedging and wholesaling
- Manufacturing
- Retailing
- Recycling and collecting
- Service industries, such as gemmological laboratories, assayers and secure transport providers

MORE INFORMATION

Find out more about joining the Responsible Jewellery Council here:



www.responsiblejewellery.com/membership/apply/

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POSITIVE LUXURY – SUSTAINABILITY ASSESSMENT & BUTTERFLY MARK CERTIFICATION



Positive Luxury help businesses in the global luxury industry to meet higher and higher standards for people and nature.

Higher standards

Positive Luxury work with luxury watch & jewellery brands to help them meet the very highest verified sustainability standards, and give them the tools to communicate sustainability performance confidently to all stakeholders and consumers.

Bespoke Sustainability Services

- ESG assessment
- Carbon assessment
- Consultancy
- Risk and Opportunity mapping
- Transition strategy
- Verification through certification
- Communication tools

Butterfly Mark Certification

Positive Luxury’s Butterfly Mark is the most prestigious trust mark of sustainability standards in the luxury industry. Earning the mark is a verification of higher standards for people, nature and business.

The ESG+ 2.0 Framework

- 23 drivers of sustainability across four pillars: Governance, Environment, Social and – uniquely – Innovation.
- Built upon the foundation of international agreements, frameworks and standards and is updated every two years.
- Aligned to CSRD adopted by the EU, and reporting frameworks for disclosure such as GRI, SASB,TCFD and TNFD, and the UN’s Sustainable Development Goals.
- Dynamic tailoring to ensure it is 100% bespoke.

Benefits

- Embed measurable sustainability in all areas of your business.
- Prepare for legislative shifts.
- Digital brand sustainability passport.
- Exclusive member access to sustainability library, marketing tools, thought leadership.

CONNECTED BUTTERFLY MARK DIGITAL PASSPORT

The Connected Butterfly Mark digital passport can be embedded online in product pages, sustainability pages, or instore via QR code to allow customers to quickly and easily access sustainability information.



[View Digital Passport](#)



GOVERNANCE

Sustainability Purpose, Sustainable Development Goals, Corporate Social Responsibility, Stakeholder Engagement, Organisational Governance, Memberships, Accreditations and Certifications, Ethics and Fair Operating Practices, Information Security, Sustainable Procurement.



ENVIRONMENT

Climate, Waste Management, Packaging, Circularity, Hazardous Materials, Water Management, Biodiversity, Animal Welfare.



SOCIAL

People Management, Diversity, Equality and Inclusion, Health, Safety and Wellbeing, Community Involvement, Human Rights and Modern Slavery.



INNOVATION

Sustainable Innovation.



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“WE WANT TO **STRENGTHEN
RELATIONSHIPS** WITH SUPPLIER
PARTNERS WHO **SHARE COMMON
VALUES** AND STRIVE TO
CONTINUOUSLY **IMPROVE THEIR
PERFORMANCE** FOR THE LONG-TERM
BENEFIT OF **BOTH OUR BUSINESSES.**”

Kesah Trowell, Group Head of Sustainability

FURTHER QUESTIONS

If you have any questions about these Standards,
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