

TIFFANY & Co.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT

At Tiffany & Co., we pride ourselves on honesty, integrity and excellence. We hold our Suppliers to the same high standards to which we hold ourselves. Our customers and stakeholders demand no less.

Tiffany & Co. and its subsidiaries and affiliates (collectively, “Tiffany”) therefore require that our Suppliers share our commitment to human rights, fair and safe labor practices, environmental protection and ethical business conduct. We expect our Suppliers to fully comply with all applicable laws, rules and regulations. We also expect Suppliers to go beyond legal compliance and strive to meet internationally recognized standards for the advancement of human rights, business ethics, and social and environmental responsibility. Suppliers are encouraged to align with *International Labor Organization* (“ILO”) conventions and the *United Nations Global Compact, Guiding Principles on Business and Human Rights* and *Sustainable Development Goals*, and work conscientiously to operate within these frameworks.

This Code of Conduct sets out general principles and requirements applicable to all Tiffany Suppliers. Additional descriptions regarding these requirements for manufacturing and supply chain partners can be found in the *Tiffany Supplier Code Guidance*.

REQUIREMENTS FOR ALL SUPPLIERS

Legal Compliance

Suppliers shall comply with and have a process to identify, monitor and understand all applicable laws, rules and regulations, including those concerning labor, health and safety, human rights, environmental protection and corruption and bribery. In the event this Code of Conduct differs or conflicts with local law, the higher standard shall prevail.

Business Integrity

The highest standards of integrity must be upheld in all business interactions. Suppliers shall conduct business ethically and all business dealings must be transparent and accurately reflected on their business books and records. Suppliers shall have a policy mandating business integrity.

Anti-Corruption and Bribery and Financial Offenses

Suppliers shall not engage in any form of corrupt practices, including bribery, extortion, embezzlement, fraud, money laundering or any business related to terrorist or armed activity. Suppliers shall not violate or cause Tiffany to violate the United States Foreign Corrupt Practices Act or any other applicable anti-corruption or bribery laws. Monitoring and enforcement procedures shall be implemented to ensure compliance with applicable anti-corruption and bribery laws.

Voluntary Employment

All workers shall be free to leave their employment without threat or coercion. Suppliers shall not employ forced, indentured, debt-bonded or convict labor, nor use any practice to coerce the continued employment of any person, such as requiring employees to pay recruitment commissions or withholding any personal or travel documents. Suppliers shall monitor relationships with recruitment agencies or contracted labor for risk of human trafficking and compliance with applicable anti-slavery laws.

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Child Labor

Suppliers shall not employ any persons under the age of 15, the age for completing compulsory education, the legal minimum age for employment in the country, or the minimum age permitted under ILO conventions, whichever standard is greatest.

Juvenile Workers

Suppliers shall ensure any young workers (those between the minimum age described above and 18 years old) are employed under well-defined circumstances, such as vocational training programs, that are not harmful to the health, safety or morals of young workers and that comply with applicable laws.

Working Hours

Suppliers shall comply with local laws and seek to align with ILO conventions intended to ensure employees do not work excessive hours per week. At a minimum, both regular and overtime hours must be taken into account, and all employees must be allowed one day off in seven. Suppliers shall keep accurate and transparent records of working hours at all times.

Wages and Benefits

Suppliers are encouraged to provide a level of compensation for a regular work week that is sufficient to meet basic needs and provide discretionary income. At a minimum, Suppliers shall comply with applicable law in the payment of wages and overtime pay and the provision of benefits, including holidays, leaves and statutory severance. Suppliers shall provide wage statements to employees for each pay period. Employees must be compensated for overtime hours at the rate legally required by local law or, where such laws do not exist, overtime should be at least 125% of the regular hourly compensation rate in accordance with ILO conventions.

Fair and Equal Treatment

Suppliers shall not use corporal punishment, threats of violence or other forms of mental or physical coercion. Sexual harassment of workers shall not be tolerated. There will be no discrimination in any part of the employment relationship on the grounds of race, religion or belief, political opinion, membership in worker organizations, age, national origin, sexual orientation, gender, marital status, parental status, disability, social group or ethnic origin, veteran's status or any other basis specified by law.

Freedom of Association

Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining. Where laws prohibit these freedoms, Suppliers shall allow the development of parallel means for independent and free association and bargaining.

Grievance Mechanisms and Remedy

Suppliers shall maintain grievance mechanisms to respond to concerns and complaints that ensure effective, timely, respectful and transparent communication among workers, their representatives, management and the community.

Health and Safety

Suppliers shall provide a safe and healthy work environment and fully comply with all applicable safety laws, regulations and industry standards. Suppliers shall regularly assess the workplace for hazards and implement appropriate programs and engineering controls to minimize the risks of work-related accidents. Suppliers will strive to continually improve the effectiveness of their health and safety programs and seek to implement best practices in their industries.

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Environment

Suppliers shall meet or exceed all environmental laws and regulations, and strive to meet or exceed the standards of international environmental treaties and best practices in their industries. Suppliers shall identify environmental risks and impacts, as well as opportunities for improving environmental performance. Suppliers shall implement and regularly review controls to mitigate identified environmental risks and minimize environmental impacts, including resource use, discharges, emissions and waste disposal, and take a proactive approach to monitoring and collecting data on these topics. Supplier operations and sourcing practices should strive to place special emphasis on the mitigation of climate change and the preservation and rehabilitation of biodiversity and ecosystems.

Host Communities

Suppliers are encouraged to proactively engage with and support development in the communities where their operations and supply chains are located, and to employ, procure and build within those communities.

Security

Suppliers shall ensure the safety and security of all workers and visitors. Suppliers shall assess security risks and establish measures to prevent product or intellectual property theft, unauthorized access to or loss of employee or customer personal information, and loss, damage or substitution of product while on site, off site or in transit. Suppliers shall take steps to ensure that human rights are protected in all aspects of its security operations, including in interactions among security personnel, workers and visitors. Suppliers are encouraged to align with the *Voluntary Principles on Security and Human Rights* where applicable.

Traceability and Due Diligence

Manufacturing and supply chain partners are encouraged to meet the standards of the OECD Due Diligence guidance and achieve full traceability throughout their supply chains. They shall also follow Tiffany's supply chain policies and requirements.

APPLICATION AND COMPLIANCE

Suppliers are responsible for ensuring that this Code of Conduct is understood and followed throughout their operations. Accordingly, Suppliers must share this Code of Conduct with all workers in their local language. Suppliers are also responsible for ensuring that any approved subcontractors involved in providing goods or services to Tiffany understand and comply with this Code of Conduct.

Suppliers are expected to self-monitor in line with this Code of Conduct. Suppliers must also permit Tiffany or its agents to audit or inspect their facilities to verify compliance. During such visits, which may be scheduled or unscheduled, all workers must be free to communicate outside the presence of management and without the threat of reprisal.

Tiffany seeks to work collaboratively with its Suppliers towards continuous improvement in responsible business practices. However, we reserve the right to cancel outstanding purchase contracts, suspend future purchase contracts or terminate our relationship with a Supplier where circumstances demand.

For more information about Tiffany's sustainability practices, please visit [Tiffany.com/Sustainability](https://www.tiffany.com/Sustainability). © 2019 Tiffany and Company. All rights reserved.