

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

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TIFFANY & Co.

CONTENTS

INTRODUCTION 4

APPLICATION AND COMPLIANCE 5

MANAGEMENT SYSTEMS 6

BUSINESS INTEGRITY 10

LEGAL COMPLIANCE 10

ANTI-CORRUPTION AND BRIBERY AND FINANCIAL OFFENSES 10

VOLUNTARY EMPLOYMENT 11

CHILD LABOR 13

JUVENILE WORKERS 13

WORKING HOURS 14

WAGES AND BENEFITS 15

FAIR AND EQUAL TREATMENT 16

Discrimination 17

Harassment, Abuse and Discrimination Discipline and Training 17

FREEDOM OF ASSOCIATION 18

GRIEVANCE MECHANISMS AND REMEDY 18

HEALTH AND SAFETY 19

General 19

Fire Safety 20

Emergency Preparedness and Action Plan 21

First Aid and Medical Response 22

Industrial Hygiene (IH) and Chemical Management 23

Electrical Safety 23

Machine Safety 24

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

<i>Personal Protective Equipment (PPE)</i>	24
<i>Respiratory Protection and Equipment (RPE)</i>	25
<i>Ergonomics</i>	26
<i>Dormitories and Housing</i>	26
<i>Canteen and Food Services</i>	27
<i>Child Care Facility Management</i>	27
<i>Management of Contractors</i>	28
ENVIRONMENT.....	28
<i>Environmental Management System (EMS)</i>	28
<i>Resource Management</i>	29
<i>Chemical and Hazardous Substances Management</i>	29
<i>Biodiversity and Ecosystem Protection</i>	29
HOST COMMUNITIES.....	29
<i>Assessment of Risks</i>	29
<i>Stakeholder Engagement Processes</i>	30
SECURITY.....	30
TRACEABILITY AND DUE DILIGENCE.....	31
RESPONSIBLE MINING.....	32
REQUIREMENTS FOR SUPPLIERS OF SPECIFIC MATERIALS.....	32
<i>Diamond Warranties</i>	32
<i>Conflict Minerals (Gold, Tantalum, Tin and Tungsten)</i>	32
<i>Colored Gemstones</i>	32
<i>Sustainable Wood and Paper Sourcing</i>	33
DEFINITIONS.....	34

INTRODUCTION

At Tiffany & Co., we pride ourselves on honesty, integrity, and excellence, and we hold our Suppliers to the same high standards to which we hold ourselves. We strive to respect and protect the rights of all people whose lives are impacted by our business, from the miners who provide our raw materials to the workers who craft our jewelry. 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 (SDGs), and work conscientiously to operate within these frameworks.

The Tiffany Supplier Code of Conduct (“Code”) sets general principles and requirements applicable to our Suppliers. It also provides a framework to evaluate performance and determine whom we partner with. We intend to do business with suppliers already committed to these principles and in relentless pursuit of improvement.

In support of the core requirements provided in our Code, Tiffany has developed the following Guidance expectations that provide more detailed information about what it means to meet the core requirements of our Code. In addition, this Guidance forms the basis under which we assess the practices of each supplier using our onsite monitoring and assessment program. While we recognize there are different legal and cultural environments in which suppliers operate, we are committed to applying our Code and Guidance across all aspects of our operations, including raw material suppliers and subcontractors, globally.

Beyond communicating expectations and assessing practices, Tiffany prioritizes commitment to ongoing continuous improvement. While we reserve the right to terminate business with suppliers who do not fully meet our requirements, we prefer to work collaboratively and in good faith to address the root causes and support sustained improvements. To this end, full transparency from suppliers is a minimum expectation. We believe that partnerships based on transparency and collaboration are the only way to promote responsible and sustainable practices that benefit workers and the environment.

This Guidance offers general information and suggestions on how to comply with the Tiffany requirements but is not a substitute for legal advice. This is a living document, and Tiffany reserves the right to revise it based on experience and emerging good practice. The official language of this document is in English.

DISCLAIMER

No guarantee, warranty or representation is made as to the accuracy or completeness of this Guidance or other documents or information sources referenced in it. This Guidance is not intended to, nor does it, replace, contravene or otherwise alter the requirements of any applicable global, national, state or local governmental statutes, laws, regulations, ordinances or other requirements. This document gives general guidance only and should not be regarded as a complete and authoritative statement on any of the topics covered by it. This Guidance is neither intended to nor does it, create, establish, or recognize any legally enforceable obligations or rights.

For inquiries, feedback or complaints please contact the Responsible Sourcing team at ResponsibleSourcing@Tiffany.com.

APPLICATION AND COMPLIANCE

Suppliers are responsible for ensuring that the Code and Guidance are understood and followed throughout their operations. Accordingly, Suppliers must share the Code 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.

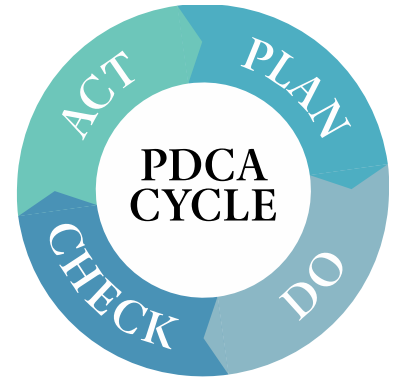
Suppliers are expected to self-monitor compliance with the Code and Guidance. However, Tiffany or its agents shall be permitted to audit or inspect a Supplier's facilities to verify compliance. During such visits, which may be scheduled or unscheduled, all workers must be free to communicate outside the presence of management and without the threat of reprisal.

Tiffany seeks to work collaboratively with its Suppliers towards continuous improvement and enhancing corporate responsibility. However, we reserve the right to cancel outstanding purchase contracts, suspend future purchase contracts, or terminate our relationship with a supplier where circumstances demand.

MANAGEMENT SYSTEMS

To consistently meet and demonstrate compliance with local law, the Tiffany Supplier Code of Conduct, and associated expectations as provided in this document, it's critical that formal management systems be implemented. While Tiffany understands that each supplier is unique, operates in a unique context, and varies with regards to size and access to resources, the implementation of formal management systems is still critical to ongoing success. Tiffany expects both the implementation of a management system and a commitment to ongoing and continuous improvement.

PDCA is an iterative four-step management method for the regulation and continuous improvement of processes and systems. PDCA cycle stands for Plan Do Check Act cycle. The plan phase is responsible for planning, do phase is for action, check phase is for monitoring and act phase is for improving purpose in this four-phase cycle. This repetitive approach requires commitment to continuous improvement by companies that want to find and test solutions to everyday problems and improve them through this cycle.



Below is a general guideline for this best practice methodology:

PLAN

Commitment, Support, and Accountability

- 1) Suppliers should maintain a policy commitment, supported at the highest level of their organization, to meet all expectations of the Tiffany Supplier Code of Conduct. This includes, but is not limited to, business ethics and corporate governance, respect for human and labor rights, safety, and the environment.
- 2) Suppliers should clearly identify the internal representative(s) responsible for ensuring implementation of the management systems and associated programs.
- 3) Management team(s) responsible for systems implementation should function with adequate independence and autonomy along with appropriately allocated and sufficient resources.
- 4) Senior management is committed to ongoing and continuous improvement and shall monitor and analyze the implementation of the policies and procedures to identify gaps at least once per year.

Risk Assessment

- Suppliers should have a human rights, safety, and environmental risk assessment process to identify and classify any adverse business, social and environmental impacts that are connected to their business practices. The risk assessment should vary in complexity, depending on your company's size, the risk of severe impacts, and the nature of operations. However, risk assessment should typically include four steps:
 - Assessing actual and potential impacts related to all aspects of the Code including, human rights, labor, health and safety, and the environment;
 - Integrating and responding to the findings through the creation of policies and procedures along with associated responsibilities;
 - Tracking responses;
 - Communicating how impacts are addressed to applicable stakeholders.

Policies

- Suppliers shall adopt a policy that documents their commitment to responsible business practices, is endorsed by senior management and actively communicated to employees. A policy is a statement of intentions and direction of an organization as formally expressed by its top management. Policies help an organization define accountability and expected conduct as it relates to the organization's operations and business. Policies also serve as a set of decision-making rules and guidelines to help drive consistent behavior and should:
 - Demonstrate commitment from the top;
 - Establish corporate responsibility and governance for key risks and issues;
 - Communicate company values, principles, and intentions.
 - Set clear expectations of your employees and business partners; and
 - Create a platform for more detailed procedures and practices.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- Senior management shall periodically undertake a formal review of key policies to ensure they are still aligned with the organizational priorities, risks, and objectives that relate to human and labor rights, health and safety, and the environment. Suppliers should also document the review process, identified gaps, and any modifications to a policy intended to address such gaps.

DO

Detailed Procedures

- Suppliers should seek to develop and maintain more detailed Standard Operating Procedures (SOPs) and Work Instruction (WI) where appropriate to help support the implementation of stated policies. Formal procedures typically include the following components:
 - **Purpose:** The purpose should define the intent of the document and be no longer than one or two sentences. It needs to be detailed enough, so end users can quickly recognize what the document covers with no other detail included.
 - **Scope:** This defines to whom or what the set of procedures applies. Many SOPs cover only what is in scope without stating what is not in scope; however, it may be appropriate to state both. By clearly spelling out what and who is and is not in scope, you offer everyone to have the same starting point of understanding.
 - **References and Related Documents:** Offer documents and references needed to understand and effectively execute the procedures in addition to other SOPs, or government-issued documents the SOP references.
 - **Definitions:** Clarify any terms that may not be familiar to end-users and spell out any acronyms or abbreviations that are used.
 - **Roles and Responsibilities:** Define the roles responsible for executing activities within the procedure.
 - **Procedure:** This is the actual procedure(s) itself. Each step should be clearly written using a simple language where possible to ensure a broad understanding of those responsible.

Training and Awareness

- Suppliers should communicate with and train managers and employees on all aspects of factory policies, procedures, and programs that apply to them or their work function. Typical communication and training methods include:
 - New employee orientation training should consist of policies related to wage, working hours and benefits, disciplinary policies, grievance mechanisms, factory rules, etc.;
 - Health and safety training, such as the use of Personal Protective Equipment, emergency evacuation, fire prevention, chemical handling, machine safety, etc.;
 - Posting and signs in the employees' local language;
 - Daily, weekly, and monthly announcements;
 - One-on-one training and discussion.

CHECK

Measurement

- Suppliers should, on an ongoing basis, measure the effectiveness of their management system policies, procedures, and employee performance in order to facilitate continuous improvement. Examples of measurement tools might include:
 - External auditing;
 - Formal and/informal internal auditing;
 - Employee and management surveys;
 - Customer and other stakeholder surveys;
 - Metrics measurement and tracking (energy use, waste removal, recycling)
 - Employee turnover rates;
 - Monthly injury and accident (type, severity, and frequency).

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

ACT

Root Cause Analysis and Preventative Action Plans

- The suppliers should have a process for investigation of root causes that can lead to an effective remedy, and immediate and/or preventative actions in response to identified non-compliance issues or other performance-related issues. Actions that only address the obvious or most visible aspects of a problem are often not adequate for addressing the issue in the longer term. A root cause is the underlying reason(s) a problem occurred and must be understood if there is an expectation of fixing the issue. The root cause(s) can typically be narrowed down to one or two of the following:
 - Lack of policies and written procedures
 - Poor implementation practices
 - Lack of executive commitment
 - Inadequate knowledge or awareness
 - Lack of accountability
 - No process to ensure ongoing monitoring and continuous improvement
- One useful approach for identifying a root cause is known as the “**5 Whys.**” This method is quite simply asking “why” a few times in a row to get to the root cause of the issue. After identifying the root cause of a particular issue, documenting a clear action plan that addresses both short term and long-term preventative action is important. Such plans should include the following components:
 - Responsibility: choose an individual responsible and accountable to ensure immediate and preventive measures are implemented. Those responsible should have the appropriate skills set, experience, and seniority to implement the plan and be supported by senior management.
 - Timeline: a timeline should be set that includes aggressive, yet realistic, final deadlines for which actions need to be completed as well as interim deadlines and actions to ensure progress.
 - Communication: where appropriate, communicate the progress status to any interested stakeholders such as, workers, supervisors, managers, and customers.

Document Control and Record Keeping

- Suppliers should document their management systems to support consistent and accurate implementation and keep consistent records to demonstrate compliance and to facilitate continuous improvement.
- Document Retention:
 - The suppliers shall maintain all documentation needed to demonstrate compliance with the Code, and Guidance expectations. Such documentation must be maintained on supplier’s premises and organized to be readily identifiable and easily accessible by Tiffany or designated representatives.
 - Suppliers shall ensure documents are retained for at least 12 months or as required by local law, whichever period of time is longer.

Monitoring and Assessment

- Upon requests suppliers shall submit to and cooperate with Tiffany, and/or designated third-party representatives, to verify compliance with the Code and applicable Guidance expectations as detailed in this document as well as applicable country law with or without prior notification.
- Submission to verification and monitoring includes:
 - Granting physical access to auditors or other representatives designated by Tiffany to supplier’s manufacturing premises and premises where pertinent documents are located. If needed for determining the actual status of working conditions on the premises, this may include areas of the workplace usually restricted from visitors for safety or intellectual property reasons.
 - Facilitating unrestricted access to supplier’s employees for purposes of confidential verification interviews. Suppliers shall not “coach” employees concerning potential auditor questions or interfere with or retaliate against employees in connection with audits or verification visits; and
 - Making available documentation needed to demonstrate compliance with the Code or required to be maintained by applicable country law.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

Transparency

- Suppliers shall be fully transparent (open and honest) regarding its implementation of and compliance with the Code, Guidance, and country law. Documentation must be maintained in an original/unaltered condition. Information and documents are not to be falsified or misrepresented. For example, suppliers are prohibited from maintaining and showing to auditors “double books” containing false or misleading information on wages or hours worked.

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.

- 1) The highest standards of integrity must be upheld in all business interactions.
- 2) Suppliers shall conduct business ethically and all business dealings must be transparent and accurately reflected on their business books and records.
- 3) Suppliers shall have a policy mandating business integrity.
- 4) Suppliers shall be fully transparent and honest during onsite assessments conducted on behalf of Tiffany. This includes allowing full access to production facilities, records, and employees for confidential interviews.
- 5) No work or portion of the work on any Tiffany goods or services may be subcontracted without the prior express written permission of Tiffany and the subcontractor's acknowledgment of and adherence with this Code.

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.

- 1) 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.
- 2) In the event this Code of Conduct differs or conflicts with local law, the higher standard shall prevail.

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 (FCPA) 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.

- 1) 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.
- 2) Suppliers shall not violate or cause Tiffany to violate the United States Foreign Corrupt Practices Act (FCPA) or any other applicable anti-corruption or bribery laws.
- 3) Monitoring and enforcement procedures shall be implemented to ensure compliance with applicable anti-corruption and bribery laws.
- 4) More specifically, suppliers shall not offer or pay or provide anything of value (including travel, gifts, hospitality expenses, charitable donations or other favors) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office, or an immediate family member of any such individual, to improperly influence any act or decision of the official, employee, or candidate or for promoting the interests of Tiffany in any respect.
- 5) Suppliers shall adhere to these expectations and any contractual obligations with Tiffany and apply the same standards throughout their entire supply chain.

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.

- 1) All workers shall be free to leave their employment without threat or coercion.
- 2) 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.
- 3) Suppliers shall comply with the requirements of country law regarding the use of contracts of employment, including any requirement that employees have a written employment contract, as well as the terms, duration and/or renewal of such employment contracts.
- 4) Suppliers shall fully explain the terms outlined in the employee's employment contract, if any, which should be written in the employee's language and a copy provided to all parties.
- 5) Suppliers shall not avoid its obligations under the law arising from the regular employment relationship through the excessive use of temporary or short or fixed-term contracts.
- 6) Suppliers shall monitor relationships with recruitment agencies or contracted labor for risk of human trafficking and compliance with applicable anti-slavery laws.
- 7) Where applicable, suppliers shall only use legally approved/registered labor agencies in accordance with country law.
- 8) During the selection and recruitment process risks of human trafficking within the company, from suppliers and contractors, including recruitment agencies, shall be assessed.
- 9) Where feasible suppliers are encouraged to hire and employ foreign workers directly, minimizing the use of labor agents and other third parties in the recruitment and management of workers.
- 10) Suppliers shall provide training to relevant employees to identify and address risks of human trafficking in its own business and its supply chain.
- 11) Employees shall not be required to turn over their original identity papers (such as passports, travel or residency permits, national IDs or school certificates) or personal items to their employer, labor agent or another party as a condition of employment.
- 12) Suppliers shall allow employees to move freely within their designated work areas during work hours, including being allowed access to drinking water and toilet facilities.
- 13) Suppliers shall adopt practices and controls to ensure that workers are entitled to meal and rest breaks during which they are relieved of all work duties and are free to leave the facility or work area. Suppliers that provide dormitories or other housing for employees, including their families, must clearly communicate security practices, including curfew policies. Curfews must be reasonable and allow enough time to relax and participate in personal activities during non-working hours.

Foreign Migrant Labor

For supply chain employees who are recruited to migrate to another country in order to find employment:

- 1) Employment contracts that explicitly state the terms of employment including all salary and benefits must be discussed and agreed upon before employment begins.
- 2) Suppliers shall directly pay all needed and legally permitted employment eligibility fees, either by the sending or receiving country, including any recruitment, placement agency, passport, or other visa related fees. Such fees may not be deducted from wages at any time by way of garnishments, levies, deposits, guarantee monies or otherwise. Where it is not possible to directly pay the agency and other employment eligibility fees in advance, or if any of the above fees are legally required to be paid by the foreign worker, the suppliers shall promptly and fully reimburse the employee for those fees within one month of the employee's arrival.
- 3) Suppliers shall be responsible for all arrival airfare/transportation costs, including departure and arrival taxes and fees for recruited foreign workers.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 4) Suppliers shall be responsible for any insurance costs required to cover foreign workers in either the sending or receiving country, including medical insurance.
- 5) Suppliers shall be responsible for all return airfare/transportation costs, including departure and arrival taxes and fees for recruited foreign workers unless the employee:
 - Is terminated for illegal conduct;
 - Obtains other legal employment within the country;
 - In cases where the employee voluntarily terminates their employment prior to the conclusion of the term of the employment the suppliers are responsible for the cost of transportation on a pro-rata basis based on the terms of the employment contract or local law requirements;
- 6) Suppliers shall ensure that the terms outlined in the employee's written employment contract are fully explained prior to departure from their home country, including specific conditions of employment and reasons for termination.
- 7) Suppliers shall ensure employment contracts are written such that it is legally enforceable in the receiving country and written in the employee's language.
- 8) Suppliers shall ensure all employees receive a copy of the employment contract prior to leaving the country of origin. Contracts may not be provided for the employee's signature at the airport.

Off-premise work

- 1) Suppliers agrees that all manufacturing work to be performed for Tiffany shall be completed in supplier's facility or other Tiffany authorized location. Suppliers shall ensure that workers do not perform such work in any facility or location not authorized by Tiffany.
- 2) While Tiffany strictly forbids the unauthorized subcontracting of our production, we do appreciate the importance and legacy of artisanal and off-premise workers around the world. However, addressing social conditions related to off-premise workers can be complex. To address the unique circumstance of off-premise work, suppliers should, at a minimum:
 - Obtain prior authorization from Tiffany
 - Comply with applicable laws and regulations with regards to off-premise work
 - Map and document the structure/supply chain of any subcontractors and intermediaries between the suppliers and the off-premise workers and the activities that they undertake
 - Reduce where possible the number of these intermediaries
 - Undertake and document site visits to the off-premise workers' locations
 - Retain the following documentation relating to each off-premise worker:
 - Age, Name and copy of Photo Identification
 - Pay Records
 - Working Hours Records (for hourly-paid workers)
 - Contracts/Terms and Conditions
 - Health & Safety Assessments and Training
 - Description of the type of work they perform
 - The exact address of where the work was undertaken
 - Declaration from each worker concerning the non-use of child labor or help from unregistered family members
 - Declaration of the number of all children (under the legal working age) in the workers' household.
 - Any other legally mandated documentation
 - Document and communicate the following to all off-premise workers, and any intermediaries:
 - How off-premise workers can communicate directly to the factory or coordinating representative on working arrangements
 - Their legal employment rights, including any benefits they might be entitled to such as social insurance, medical, leave, etc.
 - The piece-rate calculation method and how it was determined

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- Undertake a “Time and Motion” study to ensure the piece rate is set correctly to meet at least the minimum wage and to determine estimated working hours.
- Supply all necessary production and safety equipment

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 STANDARDS, WHICHEVER STANDARD IS GREATEST.

- 1) 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 standards, whichever standard is greatest.
- 2) Suppliers shall maintain adequate human resource systems and practices to verify that each employee meets the minimum age requirement. Such systems and practices include a written hiring policy, training of hiring personnel, requiring “proof of age” documentation at the time of hire, and record keeping.
- 3) Suppliers shall take reasonable measures to ensure that such proof of age documents are accurate and complete. In those cases where proof of age documents are not reliable or unavailable, the suppliers must find other ways to verify and document the employee’s age. Examples include an “official stamped” copy of a school certificate or affidavit from the local government representative.
- 4) Suppliers shall establish, document, and maintain policies and procedures for remediation of underage employees found to be working.
- 5) The procedures for remediation of underage employees should, at a minimum, provide for the following—If a supplier is found to have employees, who are under the minimum legal age, consistent with the best interests of the employee and within the requirements of local law, the supplier shall:
 - Remove the underage employee from the workplace;
 - Provide financial and other support to enable such underage employee to attend and remain in compulsory schooling until the minimum legal working age;
 - If the underage employee is able to provide documentation that they are enrolled and attending school classes or a vocational training program, the suppliers must continue to pay the underage employee the base wage until the time they either finish school/training or reach the minimum legal working age;
 - When the underage employee reaches the age at which he or she is legally allowed to work they must be given the opportunity to be re-employed by the suppliers, if appropriate under the circumstances.
- 6) Suppliers shall ensure that any provided child-care or creche facilities, if legally allowed on the same property, are clearly segregated from any areas where production is taking place.

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.

- 1) 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.
- 2) Suppliers shall, where required by local law, ensure that all juvenile employees are registered with the appropriate authority and have received applicable health checks.
- 3) Suppliers shall not expose employees under the age of 18 to hazardous work conditions which may jeopardize the employee’s health, safety or morals. Examples include working with or near hazardous chemicals, working with dangerous machinery, night work or as otherwise identified by country law.
- 4) Suppliers shall have a process to identify work assignments that may be hazardous.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 5) Suppliers shall not allow juvenile workers to work overtime.

- 6) Vocational training, internships, technical education or work done in schools is allowed where such work is carried out in accordance with local law and where it is part of:
 - a course of education or training for which a school or training institution is primarily responsible;
 - a program of training mainly or entirely in an undertaking,
 - in which the program has been approved by the competent authority;
 - or a program of guidance or orientation designed to facilitate the choice of an occupation or of a line of training.
- 7) The company shall pay the students directly and not through an agent or school, as permitted by local law and/or stated in the contract (if applicable).

WORKING HOURS

SUPPLIERS SHALL COMPLY WITH LOCAL LAWS AND SEEK TO ALIGN WITH ILO STANDARDS 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.

- 1) Suppliers shall comply with local laws and seek to align with ILO standards intended to ensure employees do not work excessive hours.
- 2) At a minimum, both regular and overtime hours must be taken into account, and all employees must be allowed one day off in seven.
- 3) Suppliers shall keep detailed, accurate and transparent records of working hours at all times and maintain such records for at least 12 months.
- 4) Suppliers shall maintain a reliable timekeeping system that allows employees to record the time they begin and end work each day. The system must also track total hours worked, including regular and overtime hours. In countries where it is required by law, the beginning and ending time of each meal period will be recorded. In all other countries recording mealtimes is encouraged but not required and will be considered best practice.
- 5) Suppliers shall ensure that it is their practice that employees themselves record their working hours using the designated timekeeping system.
- 6) Suppliers shall inform employees of working hours changes (e.g. from normal shift to multishift and shift rotation) at least 24 hours prior notice.
- 7) The normal working week, not including overtime, shall not exceed 48 hours or local legal restrictions, whichever is more stringent.
- 8) Suppliers shall ensure that the sum of the normal and overtime working hours do not exceed daily, weekly, and/or monthly legal limits unless defined otherwise by a collective bargaining agreement.
- 9) Suppliers shall ensure the use of documented, voluntary systems for overtime work.
- 10) Suppliers shall ensure employees who refuse to work overtime are not be punished, retaliated against, or penalized in any way. Mandatory overtime is only acceptable where it is allowed under applicable law or collective bargaining agreements and clearly outlined in employment agreements or contracts. In the case of mandatory overtime, at a least 24 hours prior shall be given.
- 11) Suppliers shall, at a minimum, provide employees with at least one uninterrupted work break of no less than 30 minutes if they work longer than six hours, or as required by local law, whichever is higher.

WAGES AND BENEFITS

SUPPLIERS ARE ENCOURAGED TO PROVIDE A LEVEL OF COMPENSATION FOR A REGULAR WORKWEEK 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 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.

- 1) Suppliers are encouraged to provide a level of compensation for a regular workweek that is sufficient to meet basic needs and provide discretionary income.
- 2) 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.
- 3) Where local law does not provide for overtime hours to be paid at a premium, suppliers shall ensure compensation of at least 125% of each employee's base wage.
- 4) Suppliers shall provide wage statements to all employees for each pay period that include at least the following information:
 - Pay period and wage payment dates;
 - All regular and overtime hours worked;
 - Wage rates for hours of work;
 - Totals for regular and overtime compensation;
 - All additional compensation such as individual/team bonuses; and
 - All deductions for insurance and/or other legally mandated deductions;
 - All other non-legally mandated but agreed upon and legally permitted deductions.
- 5) The suppliers shall ensure that employees have access to information and resources to understand the payment format and method.
- 6) Suppliers shall not pay a probationary or "training" wage that is below the legal minimum and overtime wage rate.
- 7) Suppliers shall not delay or withhold payments to workers under any circumstance beyond 30 days.
- 8) Suppliers shall have a due diligence process to ensure that wages are effectively and timely received by applicable employees being paid by employment (e.g., temporary) agencies.
- 9) Suppliers must have clearly written policies and procedures regarding legally required holidays, sick leave, annual leave, maternity leave, parental leave, emergency family leave, and other leaves as required by country law.
- 10) Suppliers shall effectively communicate its leave policy to employees. Suppliers shall train its staff responsible for implementing its leave policy regarding their roles and responsibilities.
- 11) Supplier shall provide employees with written and understandable information about their employment terms and conditions, including wages and benefits, before entering employment.
- 12) If it is found that an employee has not been properly paid their earned wages, including erroneous accounting of base and/or overtime wages, the suppliers will be responsible for the back payment of those wages.
- 13) Suppliers shall not force employees to buy provisions or services from their own business or facilities or charge excessive (above average market) prices.
- 14) Suppliers that provide wage advances or loans shall ensure that the interest and repayment terms are legal, transparent, fair, and not deceptive to the employee.
- 15) Suppliers shall not use deductions from legal wages as a form of discipline.
- 16) Suppliers shall ensure that the terms of bonus or other incentive systems that are above and beyond legally required wages be explicitly communicated in writing.
- 17) Suppliers shall ensure all legally required deductions be agreed to in writing by employees.
- 18) Suppliers shall ensure applicable legal minimum wages are met after employee requested and/or approved deductions, even when they are for the employee's benefit.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 19) Suppliers shall not require employees to pay for tools to perform their job functions. As allowed by country law, employees found responsible for loss or damage to supplier's tools or property may be held financially responsible.
- 20) Suppliers shall ensure employees giving birth are entitled to unpaid maternity leave and be entitled to return to their employment on the same or equivalent terms and conditions that applied to them prior to taking leave and shall not be subject to any discrimination or loss of seniority.
- 21) Suppliers shall ensure no physical exams are conducted to verify eligibility for menstrual leave if it is a benefit mandated by the country law.
- 22) Suppliers shall have a procedure for determining and paying out all statutory severance and other separation benefits (termination payments) to which the employee is entitled under country law. This includes instances where an employee is terminated by the employer and where the employee has chosen to terminate being employed.
- 23) Any facility closure or other corporate restructuring will be conducted in accordance with all requirements of the local law. In any such situations that will result in the retrenchment or termination of employees, at a minimum, the suppliers shall:
 - Fully pay all severance, social security and other separation benefits to which employees being retrenched are entitled under local law.
 - Suppliers shall not require that employees sign any declaration of good health, waivers or releases of other rights as a condition of receiving legally entitled severance pay or other benefits. Suppliers may condition receipt of discretionary or additional severance and benefits on an acknowledgment and/or release of claims.
- 24) Suppliers shall develop a process that incrementally moves employee compensation (wages and benefits) toward meeting employees' basic needs including some discretionary income. Examples of actions suppliers can undertake to meet this objective include a regular review and adjustment of employee compensation based on the following considerations:
 - The legally required minimum wage.
 - Supplier's business needs.
 - The different levels of employee education, skill, training, professional experience and position within the company.
 - Compensation incentive programs that reward individual and collective performance.
 - Payment of a competitive wage based on comparison to wage practices of similar companies and/or main competitors within the labor market.
 - Monitoring of wages compared to inflation and changes in consumer prices so that employees do not suffer an erosion of their wages in real terms.

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.

Harassment and Abuse

- 1) Suppliers shall not use corporal punishment, threats of violence or other forms of mental or physical coercion.
- 2) Suppliers shall ensure employees of a work environment free from harassment.
- 3) Suppliers shall have written policies and procedures that cover workplace harassment prevention as well as investigation of any such claims.
- 4) Suppliers shall maintain records regarding allegations of harassment and abuse.
- 5) Suppliers shall have a written policy against harassment and abuse that includes:
 - A statement prohibiting harassment and abuse consistent with these expectations and local law;
 - A statement that no employee will be punished or retaliated against for reporting in good faith harassing or abusive treatment or behavior.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

Discrimination

- 1) Suppliers shall ensure that no discrimination exists in any part of the employment relationship (see employment relationship section for additional details) 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.
- 2) Suppliers shall have a written policy against discrimination that includes:
 - A statement prohibiting discrimination consistent with these expectations and local law;
 - A statement that no employee will be punished or retaliated against for reporting in good faith discriminatory treatment or behavior.
- 3) Suppliers shall effectively communicate its non-discrimination policy. Effective communication includes:
 - Training on non-discrimination should be included in new hire orientation training/onboarding, and Supervisor/management training;
 - Posting of the policy on employee notification board(s) or other locations where they can be easily read by employees.
 - Staff Training: suppliers shall train its staff responsible for implementing and enforcing the non-discrimination policy regarding their roles and responsibilities.
- 4) Suppliers shall ensure that all medical examinations are job-related and consistent with business necessity, specifically as it relates to not excluding applicants and employees with disabilities who are able to perform the job.
- 5) Suppliers shall ensure that employment is not based on a person's medical status unless such status conflicts with the inherent requirements of the job or is prudent for workplace safety.
- 6) Suppliers shall ensure equal opportunities for employees of all genders across all aspects of training, personal and professional development and career advancement.
- 7) Suppliers shall ensure employees of all genders receive equal pay for work of equal value, equal evaluation of the quality of their work and equal opportunities to fill open positions.
- 8) Suppliers may not discriminate on the basis of pregnancy and must comply with local legal requirements, if any, concerning accommodations for pregnant workers.
- 9) Suppliers may not discriminate on the basis of parental status or family obligations, regardless of gender.
- 10) Suppliers shall ensure that employees are not forced or pressured to use contraception.

Harassment, Abuse and Discrimination Discipline and Training

- 1) Suppliers shall maintain a formal written progressive disciplinary system that includes verbal, written, and finally termination guidelines.
- 2) Suppliers shall communicate all policies to employees. Effective communication includes:
 - New hire orientation training/onboarding;
 - Supervisor/management training;
 - Posting of the policy on employee notification board(s) or other locations where they can be easily read by employees.
- 3) Suppliers shall train its staff responsible for implementing and enforcing the workplace harassment prevention policy regarding their roles and responsibilities.

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.

- 1) Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining.
- 2) Where laws prohibit these freedoms, Suppliers shall allow the development of parallel means for independent and free association and bargaining.
- 3) Suppliers shall not deduct union membership dues, fees, fines, or other assessments from employees' wages without the express and written consent of the individual employee, unless otherwise specified in a valid collective bargaining agreement or when required by law.
- 4) Suppliers shall allow union representatives reasonable access to their members under conditions established by country law or mutual agreement between the suppliers and the union.
- 5) Suppliers shall ensure employees have the right to elect leaders and representatives of their unions and to conduct activities without supplier's interference.
- 6) Suppliers shall not threaten or use violence or the presence of police or military to intimidate employees or to prevent, disrupt or break up any activities that constitute a lawful and peaceful exercise of the right of freedom of association, including union meetings, organizing activities, assemblies, and lawful strikes.
- 7) Suppliers shall ensure that no employee or prospective employee be subject to dismissal, discrimination, harassment, intimidation or retaliation for the reason of membership in a union or worker association or participation in lawful trade union or other freedom of association activities, including exercising the right to form a union.
- 8) Suppliers shall not impose any sanction on employees organizing or having participated in a lawful strike.
- 9) Suppliers shall ensure employees who have been found to have been unjustly dismissed, demoted or who have otherwise suffered a loss of rights and privileges at work due to an act of union discrimination shall be entitled to appropriate remedies in accordance with local law.
- 10) Suppliers shall bargain in good faith.
- 11) Suppliers shall honor the terms of any signed collective bargaining agreement for the duration of that agreement.

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.

- 1) Suppliers shall maintain grievance mechanisms to respond to concerns and complaints that ensure effective, respectful and transparent communication among workers, their representatives, management and the community when applicable.
- 2) While the specific grievance process will vary from supplier to supplier depending upon its size, local laws, culture, etc. an effective grievance process should generally include:
 - Multiple channels for individuals to raise concerns and provide input to management. For example:
 - Grievance/suggestion boxes
 - Supervisors/team leaders
 - HR department/counselors
 - Trade union/worker representatives
 - "Open door" policy
 - Company "hotlines"
 - Third-parties, worker committees, meetings between management and worker's representatives, etc.
 - The ability to raise concerns confidentially (and/or anonymously), subject to the requirements of country law, if the individual so desires without fear of retaliation;
 - Communication of outcomes of suppliers investigations into claims and associated actions, where appropriate;

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- The means by which confidential information will be effectively managed;
 - Appropriate channels for receiving and addressing grievances from external parties, such as community members;
 - Access to a means of the appropriate remedy.
- 3) Suppliers shall communicate the grievance policy to employees so that employees are aware of the grievance process and their right to raise concerns.
 - 4) Suppliers shall train staff responsible for responding to grievances regarding the policy and their roles and responsibilities.
 - 5) Suppliers shall document and track grievances to ensure there is a timely response back to the employee where possible.

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.

General

- 1) Suppliers shall provide a safe and healthy work environment and fully comply with all applicable safety laws, regulations and industry standards.
- 2) Suppliers shall regularly assess the workplace for hazards and implement appropriate programs and engineering controls to minimize the risks of work-related accidents.
- 3) Suppliers will strive to continually improve the effectiveness of their health and safety programs and seek to implement best practices in their industries.
- 4) Health and Safety Management system: in order to consistently meet and demonstrate compliance with local law, the Code, and associated Guidance expectations as provided in this document, it's critical that a formal Health and Safety management system be implemented. While Tiffany understands that each supplier is unique, operates in a unique context, and varies with regards to size and access to resources, the implementation of formal management systems is still critical to ongoing success. Tiffany expects both the implementation of a management system and a commitment to ongoing and continuous improvement.
- 5) Suppliers shall also ensure the Health and Safety Management System covers the following areas:
 - Formation of a Health and Safety Committee(s) with employee representation
 - Drug and alcohol consumption
 - Workspace
 - Housekeeping
 - Lighting
 - Ventilation
 - Warehouse, loading, and storage
 - Fire prevention and safety
 - Emergency preparedness
 - First aid and medical response
 - Electrical safety
 - Industrial Hygiene
 - Ergonomics
 - Machine safety
 - Personal Protective Equipment (PPE)
 - Respiratory Protection
 - Dormitories and Housing
 - Canteen and Food Services

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- Child Care Facility Management
 - Management of Contractors
- 6) Workspace: suppliers shall provide adequate working space to allow employees and onsite contractors to perform work without risk to health, safety, and well-being.
 - 7) Housekeeping: suppliers shall ensure that all areas where employees and onsite contractors work, or travel are kept clear of hazards. At a minimum, they must:
 - Keep all places of employment, clean, dry, and in a good state of repair.
 - Maintain walkways clear of tripping hazards and other obstructions.
 - Provide a minimum clearance of 0.9 m (3 ft) for all electrical panels, eyewash/shower stations, and other emergency equipment.
 - Keep storage areas orderly at all times. Materials may not be stacked within 45 cm (18 in) of ceiling or fire sprinklers (whichever is lower).
 - Spills must be cleaned immediately, and waste disposed of properly (warning signs should be used on wet floor).
 - 8) Lighting: suppliers shall provide adequate lighting for safe working conditions and to perform applicable work assignments.
 - 9) Ventilation: suppliers shall have a system to ensure appropriate ventilation, circulation and temperature to ensure a safe working environment.
 - 10) Loading and Storage: suppliers shall implement safe loading and storage systems that include:
 - Measures to prevent the unplanned departure of vehicles before loading and unloading operations begin;
 - Measures to ensure uncoupled trailers are stable;
 - Inspection of trailers (when powered motor vehicles are used);
 - Guarding of loading bays/docks when not in use;
 - Safe stacking of materials (height, leaning);
 - Each racking installation must display a unique identification number and the safe or maximum working load;
 - Only trained employees or competent onsite contractors will carry out new racking installations, repairs, modifications or removal;
 - An annual inspection of racking installations must be completed by a competent person (where there is an identified risk of damage or injury from racking);
 - All material storage system structural damage should be reported and repaired immediately.

Fire Safety

- 1) Suppliers shall ensure each facility is constructed and equipped for rapid emergency evacuation with the following features:
 - Arrange exits such that at least two (2) different paths from every workplace (may include building, structure, section or area) provides different means of escape in the event of an exit being blocked by fire or other emergencies.
 - Maintain exits for free and unobstructed egress from all parts of the building. No door or passageways may be locked or fastened in a way that would impede egress in the case of an emergency and must open outwards in the direction of egress. Any exceptions to this requirement must (e.g. for very small workshops) must be explicitly allowed by local health and safety laws.
 - Arranged and mark exit paths, so that route of escape to safety is unmistakable.
 - Mark all doorways or passageways that could be mistaken for exits, that do not lead to a safe exit, as “NO EXIT.” Passageways that dead-end and do not lead to safe exit may not be longer than 16.67 m (50 ft).
 - Travel distances that permit timely and reliable evacuation from all occupied locations;
 - Safe passage up and downstairs and stairways that include:
 - Standard railings (for four steps or more).
 - Minimum width of 0.56 m (22 in).
 - Treads with a slip-resistant surface.
 - Uniform step height and width throughout any flight of stairs.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- Buildings constructed, equipped, maintained and operated to provide protection from fire during the time needed for escape, or alternatively, to provide fail-safe protection in place;
 - Adequate emergency lighting at all exits, along routes of escape and in all Areas of Refuge;
 - Appropriate “no smoking” signage in all areas that present a fire risk.
 - An early warning fire alarm system that can be heard and seen by all building occupants and clearly and immediately distinguishable from other signals that might be used.
 - Maintain all alarm systems in good working order. Testing is needed at frequent intervals to ensure that they are working properly.
 - Automatic sprinkler protection in all newly constructed, purchased or newly leased offices and administrative workplaces and in existing owned or leased facilities when they undergo a major renovation.
 - Adequate number of fire extinguishers for the size of the facility that carries the appropriate retardant.
 - Inspection, maintenance, and testing program to assure portable fire extinguishers are operational. Locations must attach an inspection tag containing this information to each extinguisher;
- 2) Suppliers shall evaluate and seek to prevent risks of fire through the control of heat sources, such as electrical systems and equipment, ignition sources (e.g. smoking), and the control of ignitable materials and their separation.

Emergency Preparedness and Action Plan

- 1) Suppliers shall conduct a risk assessment to document events that may lead to an emergency situation which may be unique to their location. (e.g., fire, bomb threat, active shooter, social dispute, air pollution, kidnapping/hostage, flood, tsunami, earthquake, hurricane, medical, etc.).
- 2) Suppliers shall ensure life safety is the first prioritized over product or property safety.
- 3) Suppliers shall write and make available an emergency preparedness and action plan which describes actions of management and employees to ensure personnel safety in the event of a fire or other emergency. The emergency action plan shall, at a minimum, include:
- Emergency escape procedures and emergency escape route assignments;
 - Procedures for personnel who may be required to maintain critical operations before they evacuate;
 - Procedures to account for all personnel after emergency evacuation has been completed;
 - Preferred means of reporting fires and other emergencies;
 - Names and regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan;
 - Types of evacuation to be used in emergency circumstances;
 - Designation and training of persons delegated duties under the plan which may include:
 - An emergency coordinator who leads all efforts;
 - An alternate emergency coordinator;
 - A medical emergency response team;
 - Fire wardens;
 - Evacuation coordinators; and
 - Searchers.
 - Training of all personnel with responsibility in the plan upon assignment at the location, whenever required actions under the plan change or when the plan is changed; and review of the plan annually and whenever there is a change in occupancy or space usage.
- 4) Suppliers shall ensure that evacuation training and drills are conducted for all employees at least once per year.
- 5) Suppliers shall maintain a notification/alarm system that, at a minimum, includes:
- Adequate warning to take action per procedures;
 - Notification/alarm that is perceivable above ambient noise and light levels;
 - Notification/alarm that is distinctive and recognizable;
 - Means for both automatic (e.g., smoke detection) and manual activation;
 - The system must always be operational except when testing or undergoing repairs or maintenance.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- Annual and periodic testing and maintenance must be performed by competent individuals.

First Aid and Medical Response

- 1) Suppliers shall ensure workers are not exposed to physical, chemical or biological hazards above occupational exposure limits.
- 2) Suppliers shall develop and implement processes and procedures to respond to incident and accidents that require first aid or other medical attention.
- 3) Suppliers shall have implemented first aid procedures which at a minimum cover as the following components:
 - Resources available (internally or externally) to respond to any medical emergency.
 - Emergency telephone numbers must be conspicuously located by each telephone.
 - Location and availability of medical facilities (e.g., hospitals and clinics) and emergency services (e.g. ambulance services).
 - Records of first aid and medical treatments must be maintained.
- 4) Suppliers shall ensure that an adequate number of trained/certified first-aid responders are available to cover the number of employees and hazards and employees are made aware of their names, location, and contact information.
- 5) Suppliers shall ensure, at a minimum, first aid responder training includes:
 - Certification in first aid.
 - Facility specific procedures including first aid response, bloodborne pathogens and incident reporting.
- 6) Suppliers shall ensure each facility has first aid materials (e.g., first aid kits, AED, stretcher, etc.) available based on the identified risks. First aid kits shall contain at a minimum:
 - Sterile adhesive bandages (assorted sizes).
 - Absorbent compress.
 - Sterile eye pads.
 - Triangular bandages.
 - Burn treatment.
 - Disposable gloves.
 - Visible signage for first aid boxes and equipment.
 - Monthly inspection and replenishment to meet minimum content requirements
- 7) When there is a risk of chemical exposure to eyes, face or body, suppliers shall ensure that eyewash or body flush equipment is available that meets the following minimum requirements:
 - Water must be potable (drinkable).
 - The velocity of water is such that no injury occurs.
 - Minimum flow rate: 1.5 L for a minimum of 15 minutes.
 - No sharp projections.
 - Nozzles covered to prevent airborne contamination.
 - Control valve easily located and when activated remains on until turned off.
 - Within 30 m (100 ft) of hazardous material.
 - Accessible and identifiable with a highly visible sign.
 - Water nozzles positioned between 83.8 cm (33 inches) and 114.3 cm (45 inches) from the floor.
 - Self-contained units containing a reservoir of flushing fluid must be constructed of materials that will not corrode. The flushing fluid must be protected from airborne contaminants.
 - Water temperature in units must be maintained between 15 and 35° C (60 to 90° F).
 - All equipment and piping must be freeze protected.
 - Plumbed eyewash units must be activated weekly to flush the line and verify proper operation. Self-contained units must be inspected according to manufacturers' specification.
- 8) Suppliers shall maintain incident records for a minimum of five years.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

Industrial Hygiene (IH) and Chemical Management

- 1) Suppliers shall develop, implement, and maintain a program(s) for Industrial Hygiene (IH) that includes:
 - A chemical inventory;
 - Written IH risk assessment process
 - Recordkeeping procedures for exposure monitoring results and notification reports;
 - Number of high-risk operations, if any, identified by the IH risk assessment program;
 - A process to evaluate health hazard information for chemicals prior to use;
- 2) Suppliers shall establish, implement and maintain procedures to periodically verify the effectiveness of the workplace controls, including process changes, containment systems, safe work practices, Personal Protective Equipment and Respiratory Protective Equipment;
- 3) Suppliers shall notify and train colleagues, contractors, consultants or other non-supplier working under the supplier's supervision regarding hazards, workplace control measures and emergency response actions for all hazardous chemicals to which they may be potentially exposed;
- 4) Suppliers shall obtain and make available SDSs for all hazardous chemicals on site. The data sheets must contain relevant information about the physical and chemical hazards of the material, special protective measures, and emergency response information.
- 5) Suppliers shall maintain a listing of hazardous chemicals handled on-site and update the facility chemical list when new hazardous chemicals are received and review the listing at least annually.
- 6) Suppliers shall ensure Hydrofluoric Acid is used and stored in accordance with the local laws or follow best practice where no law exists.
- 7) Suppliers shall label containers, vessels, and discharge or transfer points with the name of the chemical and the hazard. Labeling systems may be used in place of specific placards or labels;
- 8) Suppliers shall notify affected colleagues, contractors, consultants or other non-supplier colleagues working under the supplier's supervision of air sampling, risk assessment results and of any medical support results that indicate adverse effects due to workplace exposure.

Electrical Safety

- 1) Suppliers shall develop and implement processes and procedures to reduce or eliminate the risk associated with electrical hazards.
- 2) Only trained and authorized employees may conduct repairs to electrical equipment.
- 3) Individuals performing work on energized electrical circuits must hold appropriate qualifications and be specifically authorized to perform such work.
- 4) Electrical distribution areas must be guarded against accidental damage (e.g. specifically designed rooms, using substantial guard posts and rails, etc.).
- 5) Access to electrical distribution rooms must be restricted to authorized employees.
- 6) All electrical distribution panels, breakers, switches and junction boxes must be completely enclosed and protected from wet conditions.
- 7) All electrical control devices must be labeled to identify the equipment controlled.
- 8) All distribution panels must have 0.9-meter (3 feet) clearance.
- 9) All conduits must be fully supported throughout their length. Non-electrical attachments to a conduit are prohibited.
- 10) All electrical wiring and cables must be in good condition (no exposed circuits).
- 11) Extension cords must be used on a temporary basis only.
- 12) Ground Fault Circuit Interruption (GFCI) must be provided for wet locations.
- 13) Site-specific electrical safety rules must be available.
- 14) The facility must have an Inspection and testing schedule. The frequency of these inspections depends on the local country regulations, type of equipment, the environment it is used in and the frequency of use.
- 15) Major modifications to new and existing facilities must be inspected to verify compliance with legal codes.
- 16) All tools used for electrical work must be properly insulated.
- 17) Electrical-rated matting must be installed in front of all distribution panels in electric utility rooms.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 18) All employees must be trained in electrical safety rules.
- 19) Qualified individuals working on any electrical system or live circuits must, at a minimum, be trained in the following site-specific requirements:
 - Recognizing the hazards associated with their work environment.
 - Use of appropriate procedures and protective equipment.
 - Procedures for locking out and tagging out energized electrical circuits and equipment safely.

Machine Safety

- 1) Suppliers shall develop and implement process and procedures to reduce or eliminate the risk associated with injuries due to unsafe machinery.
- 2) Suppliers shall identify and implement physical control measures to reduce machinery risk (e.g. fixed guards, interlocks, two-hand controls).
- 3) Suppliers shall implement procedures to reduce or eliminate the risk of an injury from unsafe machinery, which must cover, at a minimum, the following:
 - Machinery Risk Assessment
 - Demonstration of compliance with applicable legal standards
 - Maintain relevant functional test reports and records
 - Machine Installation – A standardized process for reducing health and safety risks related to machine installation.
 - Machine Operations – Job hazard analysis, safety standard work, and in-job instruction completed for machine operations.
 - Machine Maintenance – Machine specific lockout/tagout procedures in place that address all energy sources. Job hazard analysis, safety standard work, and in-job instruction include maintenance operations.
 - Machine disposal plan
- 4) Suppliers shall ensure all employees working with machinery must receive safety training upon initial hire that includes safe operating procedures, applicable PPE, and protections against identified hazards.
- 5) Suppliers shall ensure assigned maintenance personnel are trained and qualified for machine maintenance.
- 6) Suppliers shall ensure diamond scaifes used for cutting and polishing should be guaranteed as cobalt-free.

Personal Protective Equipment (PPE)

- 1) Suppliers shall implement procedures to reduce or eliminate the risk of bodily injury through the use of Personal Protective Equipment (PPE), which must cover, at a minimum, the following:
 - Suitability of the PPE presently available and, as necessary, select new or additional equipment that provides protection from hazards greater than the minimum required.
 - PPE is used where appropriate and does not itself, add unneeded or additional risks.
- 2) Suppliers shall ensure all personal protective clothing and equipment be of safe design and construction and maintained in a sanitary and reliable condition. It's recommended that protective clothing and equipment meet NIOSH (National Institute for Occupational Safety & Health), ANSI (American National Standards Institute) or Country standards.
- 3) Eye and face protection: Prevention of eye injuries requires that all persons who may be in eye hazard areas be provided and wear protective eyewear. This includes employees, visitors, researchers, third parties, or others passing through an identified eye hazard area.
 - Suitable protection must be used when employees are exposed to hazards from flying particles, molten metal, acids or caustic liquids, chemical liquids, gases or vapors, bio-aerosols, or potentially injurious light radiation.
 - Side protectors must be used when there is a hazard from flying objects.
 - Goggles and face shields must be used when there is a hazard from chemical splash.
 - Face shields must only be worn over primary eye protection (safety glasses and goggles).
 - For employees who wear prescription lenses, eye protectors must either incorporate the prescription in the design or fit properly over the prescription lenses.
 - Equipment fitted with appropriate filter lenses must be used to protect against light radiation. Tinted and shaded lenses are not filter lenses unless they are marked or identified as such.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 4) Head protection must be furnished to and used by, all employees and contractors engaged in construction and other miscellaneous work.
- 5) Safety shoes or boots with impact protection are required to be worn when carrying or handling materials such as packages, objects, parts of heavy tools, that could be dropped; and for other activities where objects might fall onto the feet.
- 6) Suitable gloves must be worn when hazards from chemicals, cuts, lacerations, abrasions, punctures, burns, biologicals, and harmful temperature extremes are present.
- 7) Skin protection (other than gloves) must be worn when there is a possibility of chemical splashes to the body, when the atmosphere may contain contaminants that could damage the skin or be absorbed by the skin, or when contaminants could remain on the street clothes of an employee. The amount of coverage is dependent on the area of the body that is likely to be exposed. For small controlled processes, an apron may be sufficient; for work above the head, a full-body coverall may be required.
- 8) Suppliers shall ensure the PPE is maintained in clean, good working condition PPE that is stored properly and regularly inspected and replaced when needed.
- 9) Suppliers shall ensure that any worker required to wear PPE receives initial and ongoing training in the proper use and care of PPE that includes, at least, the following:
 - When and why PPE is necessary;
 - What personal protective equipment is necessary;
 - How to properly don, doff, adjust and wear personal PPE;
 - The limitations of the PPE;
 - The proper care, maintenance, useful life and disposal of the PPE.
- 10) Suppliers shall ensure each employee demonstrates an understanding of the training and the ability to use PPE properly before being allowed to perform work requiring the use of PPE.
- 11) Suppliers shall ensure that when the factory management has reason to believe that any affected employee who has been trained does not have the understanding or skills required to use the PPE properly, the manager/supervisor must retrain such employees.
- 12) Suppliers shall not require employees to pay for PPE necessary to safely perform their job functions.

Respiratory Protection and Equipment (RPE)

- 1) Suppliers shall develop and implement a respiratory protection program to protect employees and onsite contractors from over-exposures to regulated chemicals or other particulates that could affect their respiratory system.
- 2) Suppliers shall identify and evaluate the respiratory hazards in the workplace, including a reasonable estimate of employee exposures and identification of the contaminant's chemical state and physical form.
- 3) If respirators are to be used to reduce the exposure of employees to hazardous air contaminants, suppliers must develop and implement a written respiratory protection program with worksite-specific procedures. The plan must include the following elements:
 - Designation of a qualified program administrator to oversee the program;
 - Evaluation of job assignments to determine the need for respiratory protection: Jobs in which employees may be exposed to breathing air contaminated with harmful levels of dust, fumes, sprays mists, fogs, smokes, vapors, gases or radioactive material must be identified as potential situations for need of respiratory protection;
 - Determination of eligibility and medical evaluation requirements to wear a respirator.
 - Selection of a respirator certified by the National Institute for Occupational Safety and Health (NIOSH) that must be used in compliance with the conditions of its certifications.
- 4) Suppliers shall obtain a written recommendation regarding the employee's ability to use the respirator from the physician or other licensed/certified health care professional (PLHCP).
- 5) Suppliers shall ensure additional medical evaluations are required under certain circumstances such as:
 - Employee reports medical signs or symptoms related to the ability to use respirator;
 - PLHCP, program administrator, or supervisor recommends reevaluation;
 - Information from the respiratory program, including observations made during fit testing and program evaluation, indicates a need;

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- Change occurs in workplace conditions that may substantially increase the physiological burden on an employee;
 - Annual review of medical status is not required.
- 6) Suppliers shall ensure all employees using a negative or positive pressure tight-fitting facepiece respirator must pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT).
 - 7) Suppliers shall ensure respirators are cleaned and disinfected at the following intervals:
 - As often as necessary to maintain a sanitary condition for exclusive-use respirators;
 - Before being worn by different individuals when issued to more than one employee;
 - After each use for emergency-use respirators and those used in fit testing and training.
 - 8) Suppliers shall ensure all filters, cartridges, and canisters used in the workplace must be appropriate for the environment in which they are used and labeled and color-coded (e.g. the NIOSH approval label).
 - 9) Suppliers shall ensure that filters, cartridges, and canisters must be monitored and changed based upon a pre-determined schedule with consideration for contaminant type and related exposures.
 - 10) Suppliers shall ensure respiratory protection training is conducted at the time of initial assignment and at least annually for all employees who are required to wear respirators to safely perform their job functions and include at a minimum:
 - Proper procedures for putting on and taking off respirators (including seal check process);
 - Proper cleaning and storage;
 - Cartridge replacement procedures where applicable;
 - Why the respirator is necessary and how improper fit, use, or maintenance can compromise the protective effect of the respirator limitations and capabilities of the respirator;
 - Limitations and capabilities of the respirator;
 - Use in emergency situations;
 - Recognition of medical signs and symptoms that may limit or prevent effective use.
 - Suppliers shall not require employees to pay for RPE necessary to safely perform their job functions

Ergonomics

- 1) Suppliers shall implement and maintain procedures to address ergonomic hazards which cover, at a minimum, the following:
 - Early reporting of musculoskeletal disorders (MSDs), their signs and symptoms, and MSD hazards;
 - Employee involvement process that includes periodic communications about ergonomics and review of employee suggestions related to ergonomic issues;
 - Process to correct ergonomic problems that are presented via reporting of ergonomic hazards or injury trends;
 - For repetitive activities, opportunities for breaks or changes in activity are provided;
 - Assessment of individual computer workstations;
 - Incorporate ergonomics into design of equipment and processes.
- 2) Suppliers shall ensure that all persons involved in tasks involving ergonomic related hazards must be trained on the following:
 - Common MSDs and their signs and symptoms;
 - The importance of reporting MSDs and their signs and symptoms early and the consequences of failing to report them early;
 - How to report MSDs and their signs and symptoms in the workplace;
 - The kinds of risk factors, jobs, and work activities associated with MSD hazards;
 - Methods, tools, or equipment used to mitigate risk factors;
 - Specifics of the site ergonomics program.

Dormitories and Housing

- 1) Suppliers shall ensure all provided dormitories or housing are maintained as safe, hygienic, and healthy.
- 2) Suppliers shall develop and implement processes and procedures to reduce or eliminate the risk of operating and maintaining dormitory or other housing facilities.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 3) Suppliers shall ensure housing is structurally sound, in good repair, secure and provides safe protection to occupants against the elements.
- 4) Suppliers shall ensure that housing has appropriate response capabilities from local emergency response personnel including fire, medical and police agencies.
- 5) Suppliers shall provide for a minimum of four (4) square meters of living space per occupant with provisions for private storage of personal effects for each individual held therein.
- 6) Suppliers shall provide adequate lighting and electric services to all living areas.
- 7) Suppliers shall provide for the sanitary collection and disposal of garbage.
- 8) Suppliers shall provide Individual beds, cots or bunks to each occupant.
- 9) Suppliers shall ensure any bedding materials provided by the facility must be clean and sanitary.
- 10) Suppliers shall ensure separate sleeping areas are provided for each gender, except in cases where families are being housed together.
- 11) Suppliers shall ensure that toilet facilities are:
 - Provided at a ratio of one toilet for every 15 occupants;
 - Within 50 meters of each living unit;
 - Separated by gender and marked as such;
 - Cleaned and sanitized daily.
- 12) Suppliers shall ensure that all shower and washing areas:
 - Have pressurized, hot and cold potable water;
 - Shower and washing areas must be within 50 meters of each living unit;
 - Separate for each gender type and marked as such;
 - Constructed of nonabsorbent materials and sanitized daily.
- 13) Suppliers shall ensure that sanitary eating and food preparation areas are provided.
- 14) Suppliers shall ensure emergency evacuation plans are posted in conspicuous locations throughout the facility (e.g. all entry points on each floor) that include detailed evacuation procedures in the event of an emergency.
- 15) Suppliers shall ensure fire extinguishing equipment is provided in a readily accessible location not more than 30 meters from each living area.
- 16) Suppliers shall ensure a minimum of two (2) exits clearly marked are provided for each floor.
- 17) Suppliers shall ensure Bi-Annual fire drills are conducted and documented.
- 18) Suppliers shall ensure first aid kits are provided and readily accessible for use at all times at a ratio of one kit per 50 occupants.
- 19) Any hazardous chemicals must be stored only in designated areas.

Canteen and Food Services

- 1) All food made available to Workers shall be prepared, stored, and served in a safe and sanitary manner in accordance with all applicable laws and regulations.
- 2) All areas of food preparation shall meet the hygiene and sanitary standards specified in applicable laws and regulations.
- 3) Sanitary licenses and permits and inspection records shall be maintained and posted in areas of food preparation and serving as per applicable laws and regulations.

Child Care Facility Management

- 1) Suppliers shall develop and implement formal written processes and procedures to reduce or eliminate the risk associated with working with children or childcare facilities.
- 2) Childcare facilities shall not physically overlap with production areas and children shall not have access to production areas.
- 3) Children under the minimum working age shall not be allowed in workplace areas at any time, unless they are part of a guided school tour or other such unusual event.
- 4) Children must not visit parents in workplace areas.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

Management of Contractors

- 1) Suppliers shall develop and implement processes and procedures to reduce or eliminate health, safety and environment risk associated with the onsite contractor and subcontractor activities.
- 2) Suppliers shall maintain qualification processes for any contractor or subcontractor performing equipment or facility maintenance or are performing tasks with greater than “low” risk. Qualification processes as a minimum include:
 - Historical ESH performance;
 - Liability insurance;
 - Implementation of applicable safety programs and training.
- 3) Suppliers shall conduct a contractor/subcontractor pre-job review and orientation which includes as a minimum:
 - Orientation of facility including emergency exits, alarm recognition, and actions to take in the case of an emergency;
 - Verification of any required contractor/subcontractor training and or certifications;
 - Verification of safety data sheet (SDS) for any chemicals brought on site;
 - Review of the equipment brought on-site to ensure it is in good condition and complies with all regulatory requirements;
 - Review of all applicable HSE regulations as well as facility HSE policies and procedures;
 - Review of general safety rules;
 - Housekeeping, cleanup and disposal requirements;
 - Incident reporting;
 - Provisions of noncompliance.

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.

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.

Environmental Management System (EMS)

- 1) Suppliers shall have a formal and documented EMS to identify environmental risks and impacts, as well as opportunities for improving environmental performance.
 - Suppliers shall implement and regularly review documented controls to mitigate identified environmental risks and minimize environmental impacts, including resource use, discharges and/or emissions to air, water and soil (including greenhouse gases and other pollutants) and waste disposal, and take a proactive approach to monitoring and collecting data on these topics.
 - Suppliers shall, without limitation maintain, and keep current with all required environmental permits, approvals and registrations and follow the operational and reporting requirements of such permits.
 - 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 communicate to and train all employees on any aspect of the environmental management system applicable to them or their job duties.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

Resource Management

- 1) Suppliers shall identify and monitor all materials and resources used in their business and strive to increase efficiencies and reduce environmental impacts through their maintenance and production processes, and by reducing, re-using, recycling or substituting.
- 2) Suppliers shall maintain a system to identify, monitor, and record data for the following environmental factors:
 - Energy Consumption including renewable energy
 - Greenhouse Gas Emissions (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃)
 - Other Air Emissions (including (Ozone Depleting Substances, Volatile Organic Compounds and Particulate Matter)
 - Environmental Noise Levels
 - Waste and Recycling
 - Water use and Discharge

Chemical and Hazardous Substances Management

- 1) Suppliers shall have a management system to identify chemicals or other hazardous materials being used, released, discharged and manage them to meet or exceed all legal requirements to ensure their safe handling, movement, storage, use, recycling, reuse and disposal.
- 2) Suppliers shall ensure Safety Data Sheet (SDS) are obtained from the chemical manufacturer and are readily available to relevant workers in their own language.
- 3) All hazardous chemical containers shall be labeled with chemical name and hazard warning.
- 4) Suppliers shall ensure chemical and waste storage areas shall be designed and maintained to prevent leaks using secondary containment.
- 5) Suppliers shall, where possible, use alternatives to hazardous substances in their operations.

Biodiversity and Ecosystem Protection

- 1) Suppliers shall prioritize the minimization of environmental impacts throughout the supply chain.
- 2) Suppliers shall assess potential environmental impacts on land, water, air and biodiversity affected by their operations, and identify ways to mitigate these impacts.
- 3) Tiffany strongly encourages continuous improvement and management systems to improve environmental issues. For suppliers that have received third-party certifications, such as ISO14001, IRMA and RJC, Tiffany will take into consideration the applicability of those certification systems and how they align with our requirements.

HOST COMMUNITIES

SUPPLIERS ARE ENCOURAGED TO SUPPORT DEVELOPMENT IN THE COMMUNITIES WHERE THEIR OPERATIONS AND SUPPLY CHAINS ARE LOCATED, AND TO EMPLOY, PROCURE AND BUILD WITHIN THOSE COMMUNITIES.

Where applicable the following best practices related to host community relations are strongly encouraged:

Assessment of Risks

- 1) In line with accepted frameworks, such as the International Finance Corporation Performance Standards and the UN Guiding Principles on Business & Human Rights, establish and maintain a documented policy and process for identifying the environmental and social risks and impacts of the projects and business activities on stakeholders (groups and individuals, including community members, rights holders, and others), for example a Materiality Analysis. The type, scale, and location of the project and/or activities shall guide the scope and level of effort devoted to the risks and impacts identification process.
- 2) Consider all relevant environmental and social risks and impacts of the project and/or business activities, including but not limited to the following listed issues and those who are likely to be affected:
 - Labor and Working Conditions
 - Resource Efficiency and Pollution Prevention
 - Community Health, Safety

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- Land Acquisition and Involuntary Resettlement
- Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Indigenous Peoples
- Cultural Heritage

Stakeholder Engagement Processes

- 1) Identify stakeholders (groups and individuals, including community members, rights holders, and others) who may be affected by or interested in the company's project or business activities.
- 2) Develop a stakeholder engagement plan that is scaled to the risks and impacts of the applicable project and/or business activities.
- 3) Consult with stakeholders to design engagement processes
- 4) Begin engagement process prior to or during activity planning and maintain throughout the life of the project and/or business activities.
- 5) Cultivate two-way dialogue and meaningful engagement by:
 - Providing relevant information to stakeholders in a timely manner;
 - Soliciting feedback from stakeholders on issues relevant to them;
 - Including site management and subject-matter experts when addressing concerns of stakeholders;
 - Acting in a manner that is respectful, free from manipulation, interference, coercion or intimidation;
 - Providing feedback on how the company has considered and/or addressed its impacts.
- 6) Design a stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide oversight of the project's or business activity's environmental and social performance throughout the life of the project.
- 7) Ensure mechanisms are accessible to all stakeholders, accounting for language and other potential barriers to effective engagement and are culturally appropriate.
- 8) Demonstrate that efforts have been made to include the participation by women, men, and marginalized and vulnerable groups or their representatives.
- 9) Where applicable, demonstrate that efforts have been made to confirm if community representatives represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them.
- 10) Document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders.
- 11) Report back to affected communities and stakeholders on issues raised during engagement processes.
- 12) Where there are affected communities, the suppliers should establish a grievance mechanism to receive and facilitate the resolution of concerns and grievances about the supplier's environmental and social performance.

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. IN THIS REGARD, SUPPLIERS ARE ENCOURAGED TO ALIGN WITH THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS WHERE APPLICABLE.

- 1) Suppliers shall ensure the safety and security of all workers and visitors as a number one priority.
- 2) 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.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 3) Suppliers shall take steps to ensure that human rights are protected and prioritized in all aspects of its security operations, including in interactions among security personnel, workers and both authorized and unauthorized visitors.
- 4) In this regard, mining suppliers are strongly encouraged to align with the Voluntary Principles on Security and Human Rights (<https://www.voluntaryprinciples.org/what-are-the-voluntary-principles>) and other suppliers are encouraged to refer to the Principles where applicable as it relates to:
 - Risk Assessment
 - Interactions between the company and public and private security
 - Security Arrangements
 - Deployment of Conduct and Training
 - Consultation and Advice
 - Responses to Human Rights Abuses

TRACEABILITY AND DUE DILIGENCE

MANUFACTURING AND SUPPLY CHAIN PARTNERS SHALL TAKE STEPS TO ENSURE TRANSPARENCY THROUGHOUT THEIR SUPPLY CHAINS, CONDUCT DUE DILIGENCE IN LINE WITH THE OECD DUE DILIGENCE GUIDANCE WHERE APPLICABLE, AND FOLLOW TIFFANY'S SUPPLY CHAIN POLICIES AND REQUIREMENTS.

- 1) Manufacturing and supply chain partners shall take steps to ensure transparency throughout their supply chains.
- 2) Suppliers shall follow Tiffany's supply chain policies and requirements.
- 3) Suppliers are encouraged to conduct due diligence in line with the OECD Due Diligence Guidance. The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") is the first example of a collaborative government-backed multi-stakeholder initiative on responsible supply chain management of minerals from conflict-affected areas, including but not limited to tin, tantalum, tungsten and gold. Its objective is to help companies respect human rights and avoid contributing to conflict through their mineral sourcing practices. The OECD Guidance is also intended to cultivate transparent mineral supply chains and sustainable corporate engagement in the mineral sector with a view to enabling countries to benefit from their mineral resources and preventing the extraction and trade of minerals from becoming a source of conflict, human rights abuses, and insecurity. The OECD Guidance provides companies with a complete package to source minerals responsibly in order for trade in those minerals to support peace and development and not conflict. The OECD Guidance document can be found at: <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>
- 4) Suppliers shall maintain a Restricted Substance and Raw Materials (RSRM) policy and management system that includes their commitment to conducting due diligence to source raw materials from responsible sources. The scope of the raw materials should go beyond the conflict minerals (3TG: Tantalum, Tin, Tungsten and Gold) and be unbounded by origin location.
- 5) Suppliers are strongly encouraged to conduct human rights due diligence to identify, prevent, mitigate and account for how they address their impacts on human rights, in line with the UN Guiding Principles on Business and Human Rights.
- 6) As covered in the "Management Systems" section of the Guidance document supplier RSRM management systems should ensure that they and their sub-suppliers operate in conformance to all requirements and cover the following:
 - Commitment, Support and Accountability
 - Risk Assessment
 - Policies
 - Detailed Procedures
 - Measurement
 - Document Control
 - Root Cause and Preventative Action Plans
- 7) Suppliers shall strive to seek out and engage with credible certification programs that incorporate traceability expectations.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 8) Tiffany strongly encourages continuous improvement and management systems to improve environmental issues. For suppliers that have received third-party certifications, such as ISO14001, RJC and IRMA, Tiffany will take into consideration the applicability of those certification systems and how they align with our requirements.

RESPONSIBLE MINING

While Tiffany and/or many of our suppliers do not own or operate any mines, many of our products rely on mined materials. We believe the way precious metals and gemstones are extracted is of the utmost importance. We strive to uphold the highest standards for sourcing across our mining supply chain, and we believe that, when done responsibly, large- and small-scale mining can be a positive source for social and economic development. It's important that suppliers, both those that mine and/or those that have their own supply chains that rely on mines, have responsible mining requirements in place.

To this end, we helped launch the [Initiative for Responsible Mining Assurance \(IRMA\)](#) in 2006. We believe IRMA fills a gap in the industry by providing the world's first multi-stakeholder definition of what constitutes responsible mining at industrial-scale mines globally, while being applicable to all mined materials (including metals, diamonds and gemstones). Mining companies can engage directly with IRMA by undertaking a self-assessment against the Standard for Responsible Mining and undergoing an independent third-party audit to become certified (new in 2019).

We strongly encourage mining companies to utilize the IRMA standard and such certification mechanisms directly to certify their mines. In the case of suppliers who are sourcing mined material, suppliers can also engage with IRMA by using it as a tool to gain more transparency into their supply chain, and we encourage those suppliers to request IRMA certification from their mining suppliers. At the artisanal- and small-scale mining level, we encourage companies to utilize the Fair-Mined and Fair-Trade certification systems. Finally, Tiffany was, in 2005, the first jeweler to embrace the "Golden Rules" of Earthworks' [No Dirty Gold](#) campaign and we encourage our suppliers to evaluate their gold sources in line with the Golden Rules as a useful tools to measure and demonstrate responsible mining practices.

REQUIREMENTS FOR SUPPLIERS OF SPECIFIC MATERIALS

All suppliers of gemstones and finished goods are required to follow requirements on warranty statements, certification, and traceability, based on the product they are producing.

Diamond Warranties

Suppliers hereby agree, represent and warrant that it shall adhere to all guidelines and maintain and collect all necessary warranties related to the Kimberley Process Certification and System of Warranties. Suppliers further agree and warrant that any and all diamonds, whether loose or in finished goods, invoiced to Tiffany have been purchased from legitimate sources, comply with the Diamond Source Warranty Protocol (and all applicable sanctions thereunder), are conflict-free and are in compliance with the United Nations resolutions.

Conflict Minerals (Gold, Tantalum, Tin and Tungsten)

Suppliers hereby agree, represents and warrants that it will comply and meet the requirements of Tiffany's Conflict Minerals Compliance Policy and Program (the "Program") as directed by Tiffany on an annual basis or at such other time as Tiffany may request. Suppliers shall promptly inform Tiffany if any information provided to Tiffany in connection with the Program requires updating and/or becomes inaccurate and Suppliers shall provide such updated information to Tiffany.

Colored Gemstones

Suppliers represent and warrant that they will engage in reasonable due diligence to ensure that all gemstones delivered and/or sold to Tiffany are extracted from conflict-free regions and have been mined and processed in a manner that respects human and labor rights and does not inflict environmental damage under prevailing industry standards. Suppliers shall adhere to all applicable international sanctions and Tiffany specifications and restrictions related to the sourcing, trade and sale of gemstones irrespective of where those stones have been cut and from where they have been exported. Suppliers shall provide full and complete disclosure of all physical characteristics of the gemstones (including detailed information on any treatments or irradiation), incompliance with national and international laws and industry best practice. Suppliers shall retain all documentation used to support gemstone sourcing statements, including without limitation, verifiable exporter warranties, for at least five years from the date on which the gemstone is delivered to Tiffany.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

Sustainable Wood and Paper Sourcing

Tiffany has a goal to remove commodity-driven deforestation from our key wood and paper supply chains. In collaboration with the Rainforest Alliance Tiffany developed its Wood & Paper Sourcing Guidelines for global adoption which is implemented through our buying divisions.

Tiffany requires all consumer packaging, catalogues and marketing collateral be sustainably sourced and seeks to advance the use of sustainably sourced paper and wood-related materials used as part of our business. We strive to improve our sourcing over time and are committed to using wood and paper products obtained from known, legally designated and well-managed forests.

Accordingly, when sourcing virgin content, Tiffany prefers sources in compliance with this standard:

- Source is known and traceable
- Source was legally harvested and traded
- Sources were not obtained in violation of human rights
- Timber was not harvested in forests where high conservation values are threatened
- Timber was not harvested in forests being converted to plantations or non-forest use

Tiffany & Co. strongly prefers recycled and Forest Stewardship Council® (FSC®) certified sources in recognition of FSC as an independent, third-party organization which is the gold standard in responsible forest management and chain-of-custody.

DEFINITIONS

GENERAL

Applicable law includes all the International, national, state and local laws in place where a business operates.

Business relationship: A company's business relationships are defined broadly to encompass relationships with business partners, entities in its value chain and any other state or non-state entity directly linked to its business operations, products or services. This includes entities in its supply chains beyond the first tier and both direct and indirect business relationships.

Compliance is a state of being in accordance with established guidelines, specifications or legislation.

Conflict diamonds are rough diamonds used by rebel movements or their allies to finance conflict aimed at undermining legitimate governments, as described by the UN Security Council (UNSC) and as recognized by the UN General Assembly (through resolution A/RES/55/56).¹

Employees include both directly employed workers and employed workers that regularly work at members' sites and that have employment contracts with a third party, such as a labor agent, labor provider or contractor/subcontractor.

High-risk supply chains are those, as defined by OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, with the potential for serious human rights abuses, direct or indirect support to nonstate armed groups or public or private security forces, bribery and fraudulent misrepresentation of the origin of minerals, money laundering and non-payment of taxes and royalties due to governments.

Host Communities are communities in which a worksite or mine is located.

Human rights are the universal rights and freedoms that belong to all people without discrimination. As a minimum, the RJC understands human rights to mean those rights articulated in the International Bill of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and applicable law.

Material issues are issues that are relevant or significant.

Origin: the origin of mined material is the mine, company, region or geographical location where the mine is located, whether an artisanal and small-scale mine or a medium or large-scale one. The origin of recycled material is the point at which it re-enters the jewelry supply chain. For recycled gold, silver or PGM, this is the point at which it is returned to the refiner or other downstream intermediate processor or recycler.

Policies is a statement of intentions and direction of an organization as formally expressed by its top management.

Red Flag: A red flag is a warning or indicator of a potential risk.

Remedy aims to restore individuals or groups that have been harmed—in this case by a business's activities—to the state in which they would have been in had the impact not occurred. Where this is not possible, it can involve compensation or other forms of remedy.

Rights holders are individuals or social groups whose human rights may be impacted by duty-bearers (e.g. governments, companies and other actors).

Risk: the potential for adverse impacts which result from a company's own activities or its relationships with suppliers and other entities in the supply chain.

Subcontractor is person or business which has a contract (as an "independent contractor" and not an employee) with a supplier to provide some portion of the work or services on a project.

Traceability is the ability to identify, track and trace elements of a product or substance as it moves along the supply chain from raw goods to finished products.

Vulnerable groups are characterized by their higher risk and reduced ability to cope with shock or negative impacts. Their vulnerability may be based on socio-economic condition, gender, age, disability.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

LABOR

Bargain in good faith is to regularly meet and discuss with a willingness to reach an agreement.

Blacklisting is creating, maintaining, using and/or communicating lists of employees or potential employees for the purpose of denying employment or other penalty based on legally protected status or non-job-related criteria.

Bonded labor is a form of indenture in which a loan or debt of the worker, or their family, is repaid by direct labor and the value of labor provided as reasonably assessed is not applied toward the liquidation of the debt, or the length and nature of the labor is not appropriately limited or defined.

Collective Bargaining is the negotiation of wages and other conditions of employment by an organized body of employees.

Compensation is the wages and benefits (monetary and non-monetary) provided by the supplier to the employee.

Forced Labor is any work or service obtained under the threat of penalty or for which the person concerned has not offered himself or herself voluntarily. Examples include involuntary servitude and bonded labor.

Foreign workers are production line employees hired, either directly or through a third-party, employed by the supplier and whose nationality or country of origin is different than that of the country in which the supplier's facilities/worksites is located.

Human Trafficking is obtaining labor or services through force, fraud, or coercion, or equivalent conduct that would reasonably overbear the will of the person for the purposes of forced labor or commercial sex.

Juvenile and Young Workers: are those workers between the minimum age of employment and 18 years old.

Labor agents mean private employment agencies (PEAs), recruitment agencies, labor recruiters, dispatch agencies, labor brokers, and any other third parties involved in the recruitment, selection, hiring, transportation, and/or management of workers.

Migrant Workers are those that move to another country or area within the same country in order to find employment—most common for seasonal or temporary work.

Off-premise Work is paid work carried out in one's own home or another location other than the supplier's factory or work premises.

Prevailing Wage is the level of wage generally paid in the relevant country or region of the country for work in the same sector and for comparable levels of responsibility and experience.

Psychological and verbal abuse includes screaming, threatening, or use of demeaning words toward employees and use of words or actions that attempt to diminish employee self-esteem.

Risk-based due diligence is the reasonable investigation undertaken by a business to identify, assess, prevent and mitigate risks in its supply chain where the level of supply chain scrutiny is commensurate with the identification of risks.

Sexual harassment or abuse includes:

- Unwelcome sexual comments, including comments about a person's body, appearance, or sexual activity, and advances or propositions of a sexual nature.
- Unwelcome physical conduct including assault, impeding or blocking movement or physical interference.
- Offering preferential work assignments or treatment in actual or implied exchange for a sexual relationship.
- Subjecting employees to prejudicial treatment in retaliation for refused sexual advances.

Short-term contract. In the absence of country law definition, short-term contracts are those of 1-year duration or less.

Source of material is the geographical place, person or company from which the material is obtained. The source of mined material is:

- For gold, silver or PGM: the mine or country of mining origin.
- For diamonds or colored gemstones: for upstream companies and Tier 1 midstream companies, this is the mine or country of mining origin, company and/or region. For Tier 2 midstream and downstream companies, the source will be the rough exporter (first export from country of mining origin), or Tier 1 midstream company suppliers if possible, and if not, the furthest known point in the upstream supply chain. The source of recycled material is the same as its origin.

Temporary worker is a production line worker who works on the supplier's premises, but who is provided and paid by a third-party, such as a temporary employment agency.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

HEALTH AND SAFETY

Air-purifying respirator is a respirator with an air-purifying filter, cartridge, or canister that removes specific air contaminants by passing ambient air through the air-purifying element.

Asbestos is a naturally occurring mineral, made up of long thin fibers. These fibers can be dangerous if they are inhaled as dust and are known to contribute to increased risk of lung cancer.

Biological Hazard is an airborne organic contaminant that is either generated by, or is itself, a living organism (also known as a bio-aerosol). Common bio-aerosols include bacteria, fungi, molds, mildews, dust mites, spores, legionella and pollen.

Bloodborne Pathogens are pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).

Chemical Hazard is an element or mixture of elements or synthetic substances that are considered harmful to employees.

Indoor Air Quality is the condition of the air inside buildings, including the extent of pollution caused by smoke, dust, fumes, mist, biological hazards and gases and chemicals from materials, processes and appliances.

Physical Hazards are unsafe conditions that can cause injury, illness and death (e.g. unguarded machinery, working at height, electrical hazards, heat, noise, slip and trip hazards).

Potable Water is water that is clean and healthy to drink.

Sanitation is the hygienic means of promoting health through prevention of human contact with the hazards of wastes. Hazards can either be; physical, microbiological, biological or chemical agents of disease. Wastes that can cause health problems are human and animal feces, solid wastes, domestic wastewater, industrial wastes, and agricultural wastes.

ENVIRONMENTAL

Air Emission Sources could include fumes, vapors, dusts, smoke, etc. – anything that the factory produces that is released into the atmosphere that could potentially cause harm to people or the environment, including ecosystems.

Composting means the controlled biological decomposition of organic material.

Direct Discharge is the discharge of wastewater to the environment (onto land or into a freshwater body such as a lake, stream, or ocean).

Energy Recovery is a process in which all or a part of solid waste is processed to use the heat content, or other forms of energy, of or from the material.

Hazardous material is a substance or material that exhibits one or more of the following characteristic properties—ignitability, corrosivity, reactivity, or toxicity- which presents a risk to health, safety, environment, or property when used, stored or transported. The term includes hazardous materials and hazardous wastes.

Hazardous waste means waste that exhibits one or more of the following characteristic properties – ignitability, corrosivity, reactivity or toxicity – and which presents a risk to health, safety, environment or property when improperly treated, stored or transported.

Indirect discharge is the discharge of wastewater from a facility to a treatment facility not owned or operated by the facility discharging the wastewater, such as a municipal wastewater treatment plant or an industrial park treatment plant

Industrial wastewater is wastewater from industrial processes.

Pollutants generally are any substance introduced into the environment that adversely affects the usefulness of a resource.

Pollution Control Devices is anything the facility uses that helps to reduce the amount of pollutant that is released into the environment (i.e. scrubbers, water bath, etc.).

Pretreatment is the reduction of contaminants in raw wastewater prior to the indirect discharge of the wastewater

Sludge is solid or semisolid material that is (a) generated as a byproduct from biological wastewater treatment processes, or (b) is produced during the manufacturing processes.

Storm freshwater is freshwater that accumulates from precipitation during a storm event.

Water Emission Sources could include runoff, spills, or discharge.