

TIFFANY & CO.

Annual Political Spending Disclosure

Tiffany & Co. (the “Company”) adheres to certain Principles Governing Corporate Political Spending (the “Principles”), which set forth the Company’s policies with respect to its and its employees’ lobbying expenditures. The Principles apply worldwide to the Company and all of its subsidiaries.

Under the Principles, “lobbying expenditures” include payments of money or the provision of goods, services or use of facilities in support of advocacy activities intended to monitor, inform and/or influence governmental public policy.

The Principles do not permit the Company to make any “political donations”, including payments of money or the provision of goods, services or use of facilities, to candidates, political parties, political organizations, campaign funds or to any other organization, fund, person or trust, whose purpose, in whole or in part, is to advance the candidacy of any person or persons seeking elective office, including the candidacies of nominees of any political party on a federal, national, statewide or local basis. Indirect expenditures whose purpose includes any of the foregoing are also prohibited under the Principles.

The Company does not have, and, under the terms of the Principles, will not establish, a political action committee for the purpose of soliciting the Company’s employees for personal political donations or lobbying expenditures. Through the Principles, the Company expressly acknowledges each employee’s right to make personal political donations and lobbying expenditures as a matter of the employee’s choice and commits to not taking any retaliatory action in respect of employees’ decisions with respect to personal political donations or lobbying expenditures.

The chief executive officer, chief sustainability officer and general counsel, or their respective delegates, must approve all lobbying expenditures and memberships in major trade associations (defined as those trade associations to which the Company and its subsidiaries pay at least \$25,000 in annual dues). Annually, the general counsel will provide a report to the chief executive officer and, at his or her request, the Company’s board of directors or a committee thereof, on all lobbying expenditures made by the Company, and all lobbying expenditures made by any major trade association, where the Company’s dues were used for such expenditures, in each case in the last completed fiscal year.

In accordance with the requirement of the Principles that the Company report on its website all lobbying expenditures made by the Company and, to the extent practicable, that portion of its membership dues to major trade associations that is used for lobbying expenditures, in each case in the fiscal year ended December 31, 2021, the Company hereby advises that, during such 12-month period:

- The Company paid \$150,000 to Cassidy & Associates, a government relations firm based in Washington D.C. that engaged, on behalf of the Company, in lobbying efforts focused on public policy associated with various mining law, public lands conservation and sustainability issues, including with respect to the proposed Pebble Mine in Bristol Bay, Alaska, and in communications with certain governmental agencies regarding the above; and
- The Company paid \$40,210 in membership dues to the National Retail Federation, the retail sector’s largest trade association, which they use in part for advocating for people, policies, and practices to aid the industry, on behalf of their members. The Company funds paid to this major trade association has been, or may have been, used by such major trade association on various lobbying efforts or initiatives, including, as disclosed to the Company by the National Retail Federation, certain efforts or initiatives of the National Retail Federation which may have been

focused on health care management, data security matters, fair labor standards, corporate tax matters or transportation and infrastructure support for the retail industry.

Historical Political Spending Disclosure

The Company first began collecting and disclosing data on lobbying expenditures in fiscal 2021 (the fiscal year ended December 31, 2021). Prior to fiscal 2021, the Company collected and disclosed data on “political expenditures”^{*} beginning in fiscal 2012 (the fiscal year ended January 31, 2013). The below chart reports lobbying expenditures or political expenditures, as applicable, for each year since the beginning of such data collection.

Fiscal Year Ended	Lobbying Expenditures	
	Lobbying Expenditures Paid by the Company ¹	Lobbying Expenditures Paid by Major Trade Associations ²
January 31, 2021	\$150,000	\$40,210
January 31, 2020	\$150,000	\$0
January 31, 2019	\$314,100	\$0
January 31, 2018	\$314,100	\$0
January 31, 2017	\$314,100	\$0
January 31, 2016	\$314,100	Less than \$40
January 31, 2015	\$314,100	Less than \$345
January 31, 2014	\$314,100	Less than \$310
January 31, 2013	\$314,447	Less than \$305

^{*}“Political Expenditures” was previously defined to include payments of money as well as provision of goods, services or use of facilities to candidates, political parties, political organizations, campaign funds or to any other organization, fund, person or trust, whose purpose, in whole or in part, is (1) to advance the candidacy of any person or persons seeking elective office, including the candidacies of nominees of any political party on a federal, national, statewide or local basis; (2) to influence the outcome of any ballot initiative; or (3) to influence the outcome of any election through issues advocacy communications, whether or not such communications specifically refer to a named candidate or party.

¹ Cassidy & Associates, a government relations firm based in Washington D.C. has engaged, on behalf of the Company, in lobbying efforts focused on certain matters, including public policy concerning various mining law and sustainability issues, and in communications with certain governmental agencies regarding international gemstone sourcing as well as actions necessary to protect against wildlife trafficking.

² These figures reflect the amount of membership dues the Company or its subsidiaries paid to such trade associations, which, based on the information provided to the Company by such trade associations, may have been used by such trade associations for lobbying expenditures.