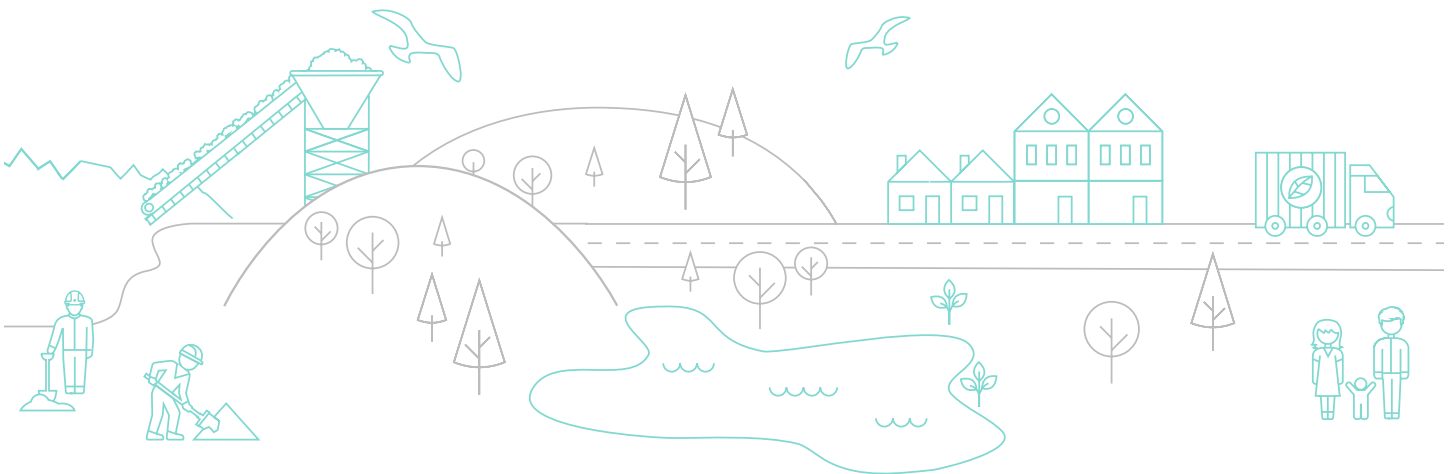


# TIFFANY & Co.

## Supplier Code of Conduct Guidance Document

Version 2.0 | Effective 2023



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## INTRODUCTION

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At Tiffany & Co., we pride ourselves on honesty, integrity and excellence, and we hold our Global 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 global 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 LVMH Group Supplier Code of Conduct and Tiffany Addendum (“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.

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 Social and Environmental Accountability (SEA) audit 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 root causes and support sustained improvements. To this end, full transparency and cooperation 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 English.

## DISCLAIMER

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*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 as to certain Tiffany expectations 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.*

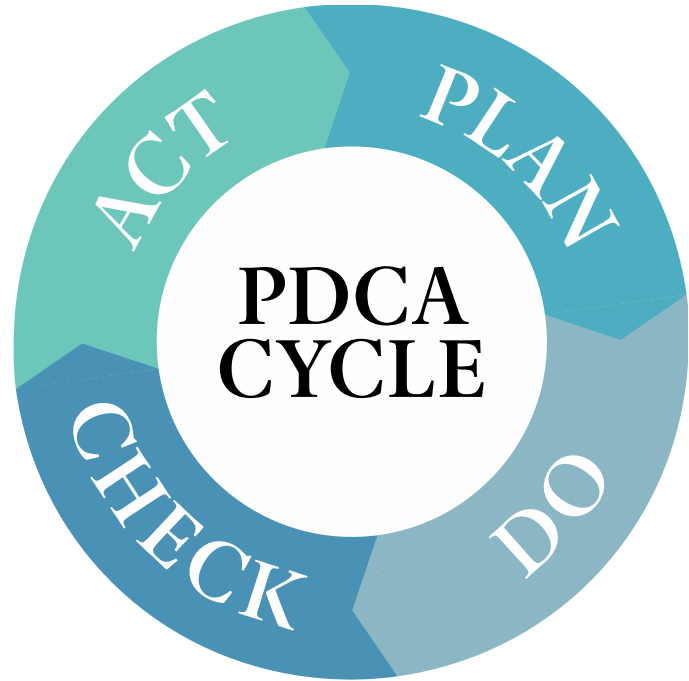
*This 2023 revised Guidance document has been updated to align with the new Code and incorporates industry standards such as the Responsible Jewellery Council (RJC) and De Beers Best Practice Principles (BPP).*

*For inquiries, feedback or complaints, please contact the Responsible Sourcing team at [ResponsibleSourcing@Tiffany.com](mailto:ResponsibleSourcing@Tiffany.com).*

## MANAGEMENT SYSTEMS (PDCA)

To consistently meet and demonstrate compliance with local law globally, the Tiffany Supplier Code of Conduct and the associated expectations provided in this document, it is critical that formal management systems be implemented. Tiffany understands that each supplier is unique, operates in a unique context and varies with regards to size and access to resources. However, we believe implementing formal management systems and making a commitment to continuous improvement is vital for success. **Below, we outline a common management system framework called the Plan Do Check Act (PDCA) that can be tailored to meet the unique aspects of each business and its associated risks.**

PDCA is a four-step framework for the development, implementation and continuous improvement of processes and procedures intended to ensure compliance. The 'PLAN' phase is responsible for planning, the 'DO' phase is for action, the 'CHECK' phase is for monitoring and the 'ACT' phase is for adjusting to improve. 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.



### PLAN

#### ***Commitment, Support and Accountability***

- 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.
- Suppliers should clearly identify the internal representative(s) responsible for ensuring implementation of management systems and associated programs.
- Management team(s) responsible for systems implementation should function with adequate independence and autonomy along with appropriately allocated and sufficient resources.
- 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 the Supplier's company size, the risk of severe impacts and the nature of operations. However, risk assessment should typically include four steps:
  1. Assessing actual and potential impacts related to all aspects of the Code, including human rights, labor, health and safety and the environment.
  2. Integrating and responding to the findings through the creation of policies and procedures along with associated responsibilities.
  3. Tracking responses.
  4. Communicating how impacts are addressed to applicable stakeholders.

# TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

## ***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 the 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 for employees and business partners.
  - Create a platform for more detailed procedures and practices.
- 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; and identify 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 that 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, everyone has the same starting point of understanding.
  - **References and Related Documents**: Provide documents and references needed to understand and effectively execute the procedures in addition to other SOPs, as well as government-issued documents referenced by the SOP.
  - **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 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, which 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 signs in the employees' local language.
  - Daily, weekly and monthly announcements.
  - One-on-one training and discussion.

# TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

## CHECK

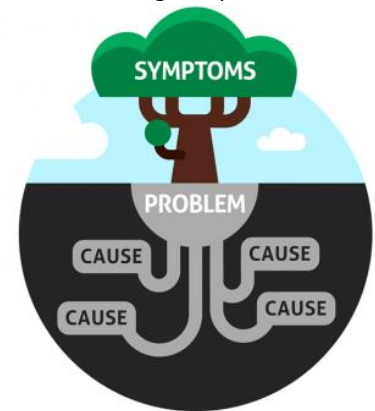
### *Measurement*

- Suppliers should, on an ongoing basis, measure the effectiveness of their management system policies, procedures and employee performance 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)

## ACT

### *Root Cause Analysis and Preventative Action Plans*

- When a non-compliance (NC) issue has been identified, either through an internal check or from an external audit, it is critical that management investigate why it occurred. Suppliers should have a process for investigation of root causes that can lead to immediate and long-term preventative actions, as well as remedy for those harmed (if applicable). Actions that only address the obvious or most visible aspects of a problem are often not adequate for ensuring compliance 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 who will be responsible and accountable for ensuring immediate and preventive measures are implemented. Those responsible should have the appropriate skill 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.



# TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

## ***Document Control and Recordkeeping***

- 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 premises and be readily identifiable and easily accessible by Tiffany and designated representatives.
  - Suppliers shall ensure documents are retained for at least 12 months or as required by local law, whichever is longer.

## ***Monitoring and Assessment***

- Upon request, Suppliers shall submit to and cooperate with Tiffany, and/or Tiffany's 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 the 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 Suppliers' 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.
  - Making available documentation needed to demonstrate compliance with the Code or required to be maintained by applicable country law.

## ***Transparency***

- Suppliers shall be fully transparent (open and honest) regarding their 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.



## SMALL BUSINESS COMPLIANCE

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The jewelry supply chain is made up of big and small businesses alike. In many countries it is dominated by family-oriented retail, design, cutting and polishing, and manufacturing businesses with 25 or fewer workers. Small-scale producers are also common around the world in mining. While our expectations included in this guidance document were designed to be applied to businesses of any size. We also strive not to make compliance unrealistic or disproportionately onerous for small businesses.

When evaluating compliance, we will take size into consideration by focusing on applicable risk and objective management system outputs, rather than maintenance of complex procedures and records. This approach acknowledges that while the management systems of small businesses or production facilities may be less formal than those of larger companies, they can work just as well. Regardless of business size, documentation should be fit for purpose and consistent. In auditing small businesses, auditors will often combine a review of relevant documents, policies and records with other tactics to assess how systems work in practice. Interviews are particularly valuable in this regard because they can reach a much greater proportion of the workforce in small businesses compared with larger workplaces, and so serve as a more accurate gauge of awareness and understanding among employees. In reading the chapters that follow, we encourage you to interpret our guidance in the context of your own business size. We also encourage suppliers to reach out to us with any questions that might arise in this regard.

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## LEGAL COMPLIANCE

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IN THE CONDUCT OF ITS ACTIVITIES, TIFFANY IS COMMITTED TO COMPLYING WITH ALL APPLICABLE LAWS, REGULATIONS, AND NATIONAL AND INTERNATIONAL CONVENTIONS, AS WELL AS WITH BEST PRACTICES, IN PARTICULAR WITH REGARDS TO LABOR STANDARDS AND SOCIAL RESPONSIBILITY, PROTECTION OF THE ENVIRONMENT, AND ETHICS AND BUSINESS INTEGRITY.

TIFFANY EXPECTS ITS SUPPLIERS TO APPLY THE SAME RESPECT FOR APPLICABLE LAWS, REGULATIONS, CONVENTIONS, AND ETHICS AND BUSINESS PRINCIPLES IN THE MANAGEMENT OF THEIR OWN COMPANIES. HENCE, TIFFANY REQUIRES STRICT COMPLIANCE WITH THESE STANDARDS BY ITS SUPPLIERS. WHEN NATIONAL LEGISLATION OR OTHER APPLICABLE REGULATIONS AND THE CODE ADDRESS THE SAME TOPICS WITH DIFFERENT STANDARDS, THE HIGHEST STANDARDS AND THE MOST RESTRICTIVE PROVISIONS SHALL APPLY.

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### *General Requirements*

- 1) Tiffany Suppliers are expected to know the local laws and regulations across all their areas of operation, and to keep abreast of legal developments in legislation and associated case law.
- 2) Ensure systems, processes, procedures or methods are in place to adequately monitor legal developments and identify key areas of legal risk.



## LABOR STANDARDS AND SOCIAL RESPONSIBILITIES

TIFFANY REQUIRES ITS SUPPLIERS TO EXHIBIT EXEMPLARY SOCIAL RESPONSIBILITY IN THEIR CONDUCT.



### PROHIBITION OF CHILD LABOR

WORK BY CHILDREN UNDER THE AGE OF 16 IS STRICTLY PROHIBITED. IN COUNTRIES WHERE LOCAL LAWS SET A HIGHER AGE FOR CHILD LABOR OR SET AN AGE FOR COMPLETION OF COMPULSORY EDUCATION HIGHER THAN 16, THE HIGHEST AGE IS APPLICABLE. WORKERS UNDER THE AGE OF 18 SHALL NOT PERFORM ANY OVERTIME OR HAZARDOUS WORK OR WORK A NIGHT SHIFT. SUPPLIERS MAY USE LAWFUL, LEGITIMATE, PROPERLY MANAGED WORKPLACE APPRENTICESHIP PROGRAMS, SUCH AS STUDENT INTERNSHIPS.

#### Management Systems

- 1) Suppliers shall maintain adequate human resource management systems to ensure each employee meets the minimum age requirement and that young workers are not exposed to hazardous conditions. This should include policies and procedures covering recruitment, age verification, contracts, work assignments, recordkeeping and the management of any childcare facilities that might exist.
- 2) Suppliers shall also ensure that human resource personnel assigned with this responsibility are properly trained in validating age documentation, appropriate recordkeeping and assigning only non-hazardous work to young workers.

#### Child Labor

- 3) Suppliers shall not employ any persons under the age of 16, 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 highest.

#### Child Labor Remediation

- 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, and be consistent with the best interests of the employee and within the requirements of local law:
  - *Remove the underage employee from the workplace.*
  - *Provide financial and other support to enable the underage employee to attend and remain in compulsory schooling until the minimum legal working age.*
  - *If the underage employee can provide documentation that they are enrolled and attending school classes or a vocational training program, the Supplier 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 Supplier, if appropriate under the circumstances.*

#### Young Workers

- 6) 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.
- 7) Suppliers shall, where required by local law, ensure that all Young Workers employed by their company are registered with the appropriate authority and have received applicable health checks.
- 8) 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.

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- 9) Suppliers shall have a process to identify work assignments that may be hazardous.
- 10) Suppliers shall not allow Young Workers to work overtime.
- 11) 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 training program mainly or entirely in an undertaking in which the program has been approved by the competent authority.*
  - *A guidance or orientation program designed to facilitate the choice of an occupation or of a line of training.*
- 12) The Supplier 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).

### **Childcare or Creche Facilities**

- 13) Suppliers shall ensure that any provided childcare or creche facilities, if legally allowed on the same property, are clearly segregated from any areas where production is taking place.
- 14) 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.
- 15) Children must not visit parents in workplace areas.



### **FORCED LABOR AND HUMAN TRAFFICKING**

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TIFFANY DOES NOT TOLERATE ANY FORM OF ABUSIVE OR ILLEGAL LABOR IN ITS SUPPLY CHAIN SUCH AS FORCED LABOR OR HUMAN TRAFFICKING. ALL FORMS OF FORCED LABOR, SLAVERY, SERVITUDE OR TRAFFICKING IN HUMAN BEINGS BY SUPPLIERS, AS WELL AS WITHHOLDING IDENTITY PAPERS OR WORK PERMITS OR REQUIRING WORKERS TO DEPOSIT A BOND OR THE USE OF ANY OTHER CONSTRAINT, IS STRICTLY PROHIBITED. ALL WORKERS ARE ENTITLED TO ACCEPT OR LEAVE THEIR EMPLOYMENT FREELY. SUPPLIERS MUST RESPECT WORKERS' FREEDOM OF MOVEMENT. SUPPLIERS CANNOT REQUIRE WORKERS TO WORK TO REPAY A DEBT TO THEM OR TO A THIRD PARTY.

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### **Management Systems**

- 1) Suppliers shall maintain adequate policies and procedures to ensure they are compliant with Tiffany's Forced Labor and Human Trafficking requirements. Such systems and practices include written recruitment and hiring policies, training of hiring personnel and detailed recordkeeping.
- 2) In those cases where suppliers employ foreign migrant workers, additional policies and procedures must be in place for the management of applicable recruitment agencies, appropriate contracts, payment of fees, travel document management, travel expenses, housing and worker training.
- 3) In those cases where suppliers utilize sub-contractors or upstream raw material Suppliers, adequate risk assessment should be performed to ensure there is no Forced Labor anywhere in the supply chain and that suppliers do not source from territories known or otherwise specified by Tiffany to be at high risk for Forced Labor. Enhanced vigilance and diligence procedures should exist, and adequate documentation should be kept.

### **General Requirements**

- 4) All workers shall be free to leave their employment without threat or coercion.
- 5) 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.
- 6) 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.
- 7) 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.

## TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 8) Suppliers shall not avoid their obligations under the law arising from the regular employment relationship through the excessive use of temporary or short or fixed-term contracts.
- 9) Suppliers shall provide training to relevant workers to identify and address the risks of human trafficking in their own business and supply chain.
- 10) 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.
- 11) 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 for 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.

### *Uyghur Forced Labor Prevention Act (UFLPA) and Supply Chain Mapping*

- 12) Suppliers shall inform Tiffany prior to shipping goods to the U.S. if the country of export or country of origin is China.
- 13) Suppliers shall ensure that the postal code of all shipments to Tiffany are not associated with the Xinjiang Uyghur Autonomous Region of China (XUAR).
- 14) Suppliers shall have enhanced vigilance and diligence on sub-contractors and upstream suppliers in sectors that are high-risk for Forced Labor, such as sectors identified on the [U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor](#). High-risk sectors include, but are not limited to, cotton, apparel, textiles and silica-based products (e.g., raw materials in aluminum alloys and polysilicon that are then used to make downstream goods such as solar panels).
- 15) Suppliers shall document and track the source of all materials in their supply chain. Upon request, Suppliers must be able to share the appropriate documentation with Tiffany. Suppliers must cooperate with Tiffany in the event of any shipment detentions.
- 16) Additionally, Suppliers should take steps to ensure none of their subcontractors appear on any lists of entities that utilize Forced Labor. For example: the Uyghur Forced Labor Prevention Act Entity List.

### *Foreign Migrant Labor Recruitment*

- 17) 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.
- 18) Where applicable, suppliers shall only use legally approved/registered labor agencies in accordance with country law.
- 19) During the selection and recruitment process, risks of human trafficking within the company from Suppliers and contractors, including recruitment agencies, shall be assessed.
- 20) Employees shall not be required to turn over their original identity papers (such as passports, travel or residency permits, national I.D.s or school certificates) or personal items to their employer, labor agent or another party as a condition of employment.

### *Contracts*

- 21) Employment contracts that explicitly state the terms of employment including all salary and benefits must be discussed and agreed upon before employment begins.
- 22) 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.
- 23) Suppliers shall ensure employment contracts are written such that they are legally enforceable in the receiving country and written in the employee's language.
- 24) 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.

### *Fees and Travel Expenses*

## TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

- 25) 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.
- 26) Suppliers shall be responsible for all ARRIVAL airfare/transportation costs, including departure and arrival taxes and fees for recruited foreign workers.
- 27) 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, 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.*
- 28) Suppliers shall be responsible for any insurance costs required to cover foreign workers in either the sending or receiving country, including medical insurance.



### **PROHIBITION OF ILLEGAL, CLANDESTINE AND UNDECLARED EMPLOYMENT**

SUPPLIERS ARE REQUIRED TO COMPLY WITH ALL APPLICABLE REGULATIONS TO PREVENT ILLEGAL, CLANDESTINE AND UNDECLARED EMPLOYMENT.

#### **Management Systems**

- 1) Suppliers shall maintain adequate policies and procedures to comply with all applicable regulations to prevent illegal, clandestine and undeclared employment.

#### **General Requirements**

- 2) Suppliers are required to comply with all applicable regulations to prevent illegal clandestine, and undeclared employment.
- 3) Suppliers agree that all manufacturing work to be performed for Tiffany shall be completed in the 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.
- 4) While Tiffany strictly forbids the unauthorized subcontracting of our production, we do appreciate the importance and legacy of artisanal and off-site workers around the world. However, addressing social conditions related to off-site workers can be complex. To address the unique circumstance of off-site work, suppliers should, at a minimum:
  - *Obtain prior written authorization from Tiffany.*
  - *Comply with written applicable laws and regulations with regards to off-site work.*
  - *Map and document the structure/supply chain of any subcontractors and intermediaries between the Suppliers and the off-site workers and the activities that they undertake.*
  - *Reduce, where possible, the number of these intermediaries.*
  - *Undertake and document site visits to the off-premises workers' locations.*
  - *Retain the following documentation relating to each off-site worker:*
    - *Age, name and copy of photo identification*
    - *Pay records*
    - *Working hours records (for hourly-paid workers)*
    - *Contracts/terms and conditions*

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- *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-site workers, and any intermediaries:*
  - *How off-site workers can communicate directly to the factory or coordinating representatives about 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 is determined.*
- 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.



### **PROHIBITION OF HARASSMENT AND ABUSE**

SUPPLIERS ARE EXPECTED TO TREAT THEIR WORKERS WITH RESPECT AND DIGNITY. SUPPLIERS MUST REFRAIN AND PROHIBIT ANY BEHAVIORS AND PRACTICES THAT CAUSE ANY FORM OF CORPORAL PUNISHMENT, PHYSICAL, SEXUAL, VERBAL OR PSYCHOLOGICAL HARASSMENT OR ANY OTHER KIND OF ABUSE.

#### **Management Systems**

- 1) Suppliers shall maintain clearly written policies and procedures to ensure employees are not subjected to harassment or abuse of any kind including sexual or gender-based violence (SGBV).
- 2) Such policies and procedures should cover harassment prevention, appropriate behavior, disciplinary practices, confidential grievance mechanisms, investigation of claims and training for both employees and all management.
- 3) Suppliers shall also maintain records regarding grievances or allegations of harassment and abuse. Also see the Grievance Mechanisms section.

#### **General Requirements**

- 4) Suppliers are expected to treat their workers with respect and dignity.
- 5) Suppliers must refrain from and prohibit any form of corporal punishment; physical, sexual or gender-based violence (SGBC), verbal or psychological harassment; or any other kind of abuse.

#### **Disciplinary Practices**

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





### **PROHIBITION OF DISCRIMINATION**

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TIFFANY EXPECTS ITS SUPPLIERS TO TREAT ALL WORKERS EQUALLY AND FAIRLY. SUPPLIERS MAY NOT ENGAGE IN ANY KIND OF DISCRIMINATION—IN PARTICULAR, WITH REGARDS TO WAGES, HIRING, ACCESS TO TRAINING, PROMOTION, MATERNITY PROTECTION AND DISMISSAL—BASED ON SEX, RACE OR ETHNIC ORIGIN, RELIGION, AGE, DISABILITY, SEXUAL ORIENTATION, POLITICAL AFFILIATION, UNION MEMBERSHIP, NATIONALITY, GENDER IDENTITY, ANCESTRY OR SOCIAL BACKGROUND, MARITAL STATUS, PRENATAL STATUS, VETERAN’S STATUS OR ANY OTHER BASIS SPECIFIED BY LAW.

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#### **Management Systems**

- 1) Suppliers shall have clearly written policies and procedures to ensure applicants and employees are not subjected to discrimination of any kind.
- 2) Such policies and procedures should cover recruitment, contracts, work assignments and promotions, wages, grievance mechanisms and investigation of claims, as well as training for both employees and all levels of management.
- 3) Records should be kept related to grievances from employees as well as training activities.

#### **General Requirements**

- 4) Suppliers shall ensure that no discrimination exists in any part of the employment relationship on the grounds of sex, race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, union membership, nationality, gender identity, ancestry or social background, marital status, prenatal status, veteran’s status or any other basis specified by law.
- 5) 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.
- 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 that all medical examinations are job-related and consistent with business necessity, specifically as they relate to not excluding applicants and employees with disabilities who are able to perform the job.
- 8) 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.
- 9) Suppliers shall ensure that employees are not forced or pressured to use contraception.



### **FAIR WAGES AND BENEFITS**

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SUPPLIERS MUST AT MINIMUM PAY ACCURATE WAGES IN LEGAL TENDER, IN A TIMELY MANNER AND ON A REGULAR BASIS, NO LESS THAN MONTHLY; COMPENSATE WORKERS FOR OVERTIME HOURS AT THE LEGAL RATE; AND MEET ALL LEGAL REQUIREMENTS RELATING TO WORKER BENEFITS. IF THERE IS NO LEGAL MINIMUM WAGE OR RATE FOR OVERTIME PAY IN THE COUNTRY CONCERNED, SUPPLIERS MUST ENSURE THAT THE WAGES ARE AT LEAST EQUAL TO THE AVERAGE MINIMUM IN THE RELEVANT INDUSTRIAL SECTOR AND THAT OVERTIME PAY IS AT LEAST THE SAME AS THE USUAL HOURLY COMPENSATION (TIFFANY-SPECIFIC REQUIREMENT: 125% OF USUAL HOURLY COMPENSATION). WAGES MUST BE SUFFICIENT TO MEET THE WORKERS’ BASIC NEEDS AND PROVIDE SOME DISCRETIONARY INCOME. WAGE DEDUCTIONS SHALL NOT BE USED AS A DISCIPLINARY MEASURE. SUPPLIERS MUST COMMUNICATE PAY STRUCTURE AND PAY PERIODS TO ALL WORKERS. TIFFANY REQUIRES ITS SUPPLIERS TO GUARANTEE THAT ALL WORKERS RECEIVE BENEFITS STIPULATED BY APPLICABLE LAW OR IN ANY APPLICABLE COLLECTIVE BARGAINING AGREEMENTS, COMPANY AGREEMENTS AND OTHER APPLICABLE NEGOTIATED INDIVIDUAL OR COLLECTIVE AGREEMENTS.

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#### **Management Systems**

- 1) Suppliers shall have clearly written policies and procedures regarding wages and benefits including terms and timing of payment, incentives, calculations, deductions, wage increases, leave and payment stubs.
- 2) Suppliers shall effectively communicate policies to all employees in writing and train responsible staff for implementation regarding their roles and responsibilities.

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- 3) Suppliers shall keep detailed, accurate and transparent records of wages and benefits and maintain such records for at least 12 months.

### *General Requirements*

- 4) Suppliers shall provide employees with written and understandable information about their employment terms and conditions, including wages and benefits, before entering employment.
- 5) 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.
- 6) 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).
- 7) Suppliers are encouraged to provide a level of compensation for a regular work week that is sufficient to meet basic needs and provide discretionary income.
- 8) Suppliers shall develop a process that incrementally moves employee compensation (wages and benefits) toward meeting employees' basic needs, including some discretionary income.
- 9) At a minimum, suppliers shall comply with applicable laws in the payment of wages and overtime pay and the provision of benefits, including holidays, leave and statutory severance.
- 10) Tiffany-specific Requirement: 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.
- 11) Suppliers shall not pay a probationary or "training" wage that is below the legal minimum and overtime wage rate.
- 12) Suppliers shall not delay or withhold payments to workers under any circumstance beyond 30 days.
- 13) 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.
- 14) Suppliers shall not force employees to buy provisions or services from their own business or facilities or charge excessive (above average market) prices.
- 15) Suppliers shall not use deductions from legal wages as a form of discipline.
- 16) 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 the Supplier's tools or property may be held financially responsible.
- 17) 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.
- 18) 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.
- 19) Suppliers shall ensure employees giving birth are entitled to unpaid maternity leave at a minimum 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.
- 20) Suppliers shall ensure all legally required deductions be agreed to in writing by employees.
- 21) Suppliers shall provide detailed 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.*
  - *All deductions for insurance and/or other legally mandated deductions.*
  - *All other non-legally mandated but agreed upon and legally permitted deductions.*

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## *Closure and Retrenchment Requirements*

- 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 their employment.
- 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.*



## **WORKING HOURS**

SUPPLIERS MUST COMPLY WITH ALL LOCAL LAWS AND REGULATIONS APPLICABLE WITH RESPECT TO WORKING HOURS, WHICH SHALL NOT IN ANY CASE EXCEED THE MAXIMUM SET BY INTERNATIONALLY RECOGNIZED STANDARDS SUCH AS THE INTERNATIONAL LABOUR ORGANIZATION. SUPPLIERS CANNOT IMPOSE EXCESSIVE OVERTIME HOURS. THE TOTAL NUMBER OF HOURS WORKED PER WEEK INCLUDING OVERTIME CANNOT EXCEED LEGAL LIMITS. WORKERS ARE ENTITLED TO AT LEAST THE MINIMUM NUMBER OF DAYS OFF ESTABLISHED BY APPLICABLE LAWS AND AT MINIMUM MUST HAVE AT LEAST ONE DAY OFF IN EVERY SEVEN-DAY PERIOD.

## *Management Systems*

- 1) Suppliers shall have clearly written policies and procedures that cover normal working hours, voluntary overtime, overtime hour restrictions, rest days, rest periods, religious festivals, timekeeping and recordkeeping.
- 2) Suppliers shall keep detailed, accurate and transparent records of all working hours and maintain such records for at least 12 months.
- 3) Suppliers shall ensure employees are trained and aware of the timekeeping systems and working hour policies including the voluntary nature of all overtime hours. In addition, responsible management shall be trained on working hour policies including those responsible for production planning.

## *General Requirements*

- 4) Suppliers shall comply with local laws and seek to align with ILO standards intended to ensure employees do not work excessive hours.
- 5) The normal work week, not including overtime, shall not exceed 48 hours or such lesser local legal restrictions that may apply, whichever is more stringent.
- 6) At a minimum, all employees must be allowed one day off in any seven-day period.
- 7) Suppliers shall ensure that workers are free to respect their religious festivals.
- 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, 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 the higher standard.
- 10) 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.
- 11) Suppliers shall ensure that employees record their working hours themselves using the designated timekeeping system.
- 12) Suppliers shall ensure the use of documented, voluntary systems for overtime work.
- 13) Suppliers shall inform employees of working hours changes (e.g., from normal shift to multishift and shift rotation) at least with 24 hours prior notice.

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- 14) Suppliers shall ensure employees who refuse to work overtime are not 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 least 24 hours prior notice shall be given.

### **FREEDOM OF ASSOCIATION**

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TIFFANY REQUIRES ITS SUPPLIERS TO RESPECT AND RECOGNIZE THE RIGHT OF WORKERS TO NEGOTIATE COLLECTIVELY, AND TO CREATE OR JOIN LABOR ORGANIZATIONS OF THEIR CHOICE WITHOUT ANY SANCTION, DISCRIMINATION OR HARASSMENT. WHEN APPLICABLE, SUPPLIERS MUST PROVIDE WORKERS' REPRESENTATIVES WITH APPROPRIATE MEANS TO EXERCISE THEIR RIGHTS. INTIMIDATION, THREATS OR DISCRIMINATORY PRACTICES AGAINST WORKERS' REPRESENTATIVES ARE PROHIBITED.

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#### **Management Systems**

- 1) Suppliers shall maintain policies and procedures to ensure workers' rights to freely associate and bargain collectively are respected and that the terms of agreed collective bargaining agreements are respected.
- 2) Suppliers shall ensure that management staff responsible for compliance are trained.

#### **General Requirements**

- 3) Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining.
- 4) Where laws prohibit these freedoms, suppliers shall allow the development of parallel means for independent and free association and bargaining.
- 5) 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.
- 6) 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.
- 7) Suppliers shall ensure employees have the right to elect leaders and representatives of their unions and to conduct activities without the supplier's interference.
- 8) 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.
- 9) 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.
- 10) Suppliers shall not impose any sanction on employees organizing or having participated in a lawful strike.
- 11) Suppliers shall ensure employees who have been found to have been unjustly dismissed, demoted or 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.
- 12) Suppliers shall bargain in good faith.
- 13) Suppliers shall honor the terms of any signed Collective Bargaining Agreement (CBA) for the duration of that agreement.



## ENSURING HEALTH AND SAFETY

IN LINE WITH THE TIFFANY HEALTH AND SAFETY POLICY, SUPPLIERS ARE EXPECTED TO PROVIDE THEIR WORKERS WITH A SAFE AND HEALTHY WORKPLACE ENVIRONMENT IN ORDER TO AVOID ACCIDENTS, BODILY INJURIES OR EXPOSURE TO DANGER WHICH MAY BE CAUSED BY, RELATED TO OR RESULT FROM THEIR WORK, INCLUDING DURING THE OPERATION OF EQUIPMENT OR CHEMICAL PRODUCTS OR DURING WORK-RELATED TRAVEL. SUPPLIERS ARE EXPECTED TO SET UP PROCEDURES AND TRAININGS TO DETECT, AVOID AND MITIGATE, AS MUCH AS POSSIBLE, ANY HAZARDS THAT CONSTITUTE A RISK TO THE HEALTH, HYGIENE AND SAFETY OF STAFF. SUPPLIERS ARE REQUIRED, AT A MINIMUM, TO COMPLY WITH ALL APPLICABLE LOCAL AND INTERNATIONAL REGULATIONS AND LAWS IN THIS REGARD. HEALTH AND SAFETY INSTRUCTIONS MUST BE PUT IN PLACE AND WIDELY COMMUNICATED. COMPLIANCE BY WORKERS MUST BE REGULARLY EVALUATED. WORKERS MUST BE PROVIDED WITH PROTECTIVE EQUIPMENT APPROPRIATE TO THEIR ACTIVITIES. THESE SAME PRINCIPLES ARE APPLICABLE TO HOUSING PROVIDED BY SUPPLIERS.

### Management Systems

- 1) Suppliers shall implement a functioning Health and Safety Management System that includes risk assessments, policies and procedures, employee and management training, self-audits and continuous improvement.
- 2) Suppliers shall also ensure the Health and Safety Management System covers the following areas:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>✓ Formation of a Health and Safety Committee(s) with employee representation</li> <li>✓ Drug and alcohol consumption</li> <li>✓ Workspaces</li> <li>✓ Housekeeping</li> <li>✓ Lighting</li> <li>✓ Ventilation</li> <li>✓ Warehouse, loading and storage</li> <li>✓ Fire prevention and safety</li> <li>✓ Emergency preparedness</li> <li>✓ First aid and medical response</li> </ul> | <ul style="list-style-type: none"> <li>✓ Electrical safety</li> <li>✓ Industrial Hygiene</li> <li>✓ Ergonomics</li> <li>✓ Machine safety</li> <li>✓ Personal Protective Equipment (PPE)</li> <li>✓ Respiratory protection</li> <li>✓ Dormitories and housing</li> <li>✓ Canteen and food services</li> <li>✓ Childcare facility management</li> <li>✓ Management of contractors</li> <li>✓ Accidents and injuries</li> </ul> |
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- 3) Suppliers shall ensure that appropriate records related to all aspects of the management system, including detailed tracking and analysis of injuries and accidents, are maintained.

### General Requirements

- 4) Suppliers shall provide a safe and healthy work environment and fully comply with all applicable safety laws, regulations and industry standards.
- 5) Suppliers shall regularly assess the workplace for hazards and implement appropriate programs and engineering controls to minimize the risks of work-related accidents.
- 6) Suppliers will strive to continually improve the effectiveness of their health and safety programs and seek to implement best practices in their industries.
- 7) Workspace: Suppliers shall provide adequate working space to allow employees and on-site contractors to perform work without risk to health, safety and well-being.
- 8) 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.*

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- *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 floors).*
- 9) Lighting: Suppliers shall provide adequate lighting for safe working conditions so that workers can perform applicable work assignments.
- 10) Ventilation: Suppliers shall have a system to ensure appropriate ventilation, circulation and temperature to ensure a safe working environment.
- 11) 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).*
  - *A requirement that each racking installation must display a unique identification number and the safe or maximum working load.*
  - *A requirement that only trained employees or competent on-site contractors will carry out new racking installations, repairs, modifications or removal.*
  - *Annual inspections of racking installations to be completed by a competent person (where there is an identified risk of damage or injury from racking).*
  - *Immediate reporting and repair of any structural damage to material storage systems.*

### Fire Safety

- 12) Suppliers shall ensure each facility is constructed and equipped for rapid emergency evacuation with the following features:
- *Arrange exits such that there are at least two (2) different paths from every workplace (may include building, structure, section or area) to provide alternative 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 (e.g., for very small workshops) must be explicitly allowed by local health and safety laws.*
  - *Arrange and mark exit paths so that the route of escape to safety is unmistakable.*
  - *Mark all doorways or passageways that could be mistaken for exits, but do not lead to safe exits, as "NO EXIT."* Passageways that dead-end and do not lead to a 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 upstairs and downstairs. Stairways must 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.*

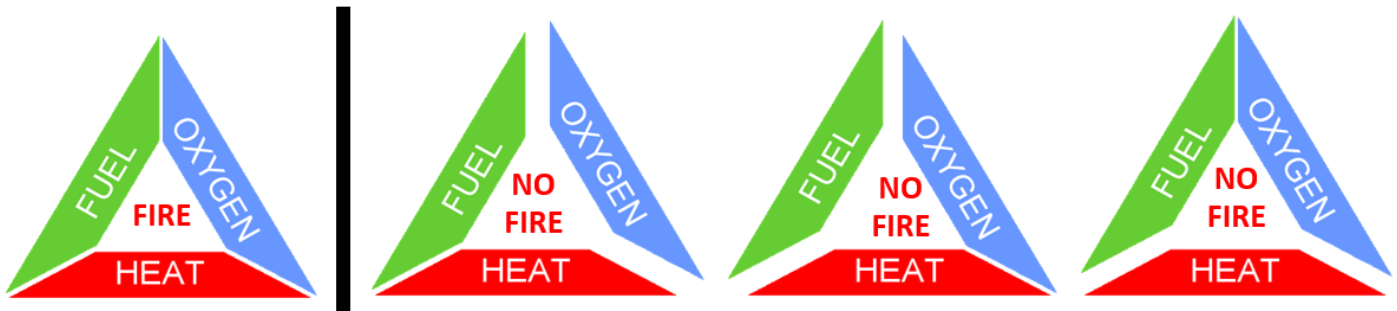


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- Buildings constructed, equipped, maintained and operated to provide protection from fire during the time needed for escape, or alternatively, to provide fail-safe protection in place.
- Adequate emergency lighting at all exits, along routes of escape 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 is 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, newly 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 programs to assure portable fire extinguishers are operational. Locations must attach an inspection tag containing this information to each extinguisher.



- 13) 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

- 14) 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.).
- 15) Suppliers shall ensure life safety is prioritized over product or property safety.
- 16) 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.
    - Searchers.





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- 17) Suppliers shall ensure that evacuation training and drills are conducted for all employees at least once per year.
- 18) Suppliers shall train all personnel with responsibility in the emergency action plan upon assignment at the location and whenever required actions under the plan change.
- 19) Suppliers must also review the plan annually and whenever there is a change in occupancy or space usage.
- 20) 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.*
  - *Annual and periodic testing and maintenance must be performed by competent individuals.*

### **First Aid and Medical Response**

- 21) Suppliers shall ensure workers are not exposed to physical, chemical or biological hazards above occupational exposure limits.
- 22) Suppliers shall develop and implement processes and procedures to respond to incidents and accidents that require first aid or other medical attention.
- 23) Suppliers shall have implemented first-aid procedures which, at a minimum, cover 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.*
- 24) Suppliers shall ensure that an adequate number of trained/certified first-aid responders are available to cover the number of employees and hazards and that employees are made aware of responders' names, locations and contact information.
- 25) 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.*
- 26) Suppliers shall ensure each facility has first-aid materials (e.g., first-aid kits, AED, stretcher, etc.) available based on the identified risks.
  - *Monthly inspection and replenishment to meet minimum content requirements.*
- 27) 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 must be 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 in) and 114.3 cm (45 in) 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.*



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- *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' specifications.*

28) Suppliers shall maintain incident records for a minimum of five years.

### ***Industrial Hygiene (IH) and Chemical Management***

29) 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.*

30) 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.

31) Suppliers shall notify and train colleagues, contractors, consultants or other non-supplier colleagues 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.

32) Suppliers shall obtain and make available safety data sheets (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.

33) Suppliers shall maintain a listing of hazardous chemicals handled on site, update the facility chemical list when new hazardous chemicals are received and review the listing at least annually.

34) Suppliers shall ensure hydrofluoric acid is used and stored in accordance with the local laws or follow best practice where no law exists.

35) 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.

36) 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 any medical support results that indicate adverse effects due to workplace exposure.

### ***Electrical Safety***

37) Suppliers shall develop and implement processes and procedures to reduce or eliminate the risks associated with electrical hazards.

38) Site-specific electrical safety programs shall be developed and implemented.

39) All employees must be trained in general electrical safety precautions consistent with the site-specific program.

40) Only trained and qualified individuals may access energized components and/or conduct repairs to electrical equipment.

41) Electrical distribution areas must be guarded against accidental damage (e.g., specifically designed rooms, using substantial guard posts and rails, etc.).

42) Access to electrical distribution rooms must be restricted to authorized employees.

43) All electrical distribution panels, breakers, switches and junction boxes must be completely enclosed and protected from wet conditions.

44) All electrical control devices must be labeled to identify the equipment controlled.

45) All distribution panels must have 0.9-meter (3-foot) clearance.



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- 46) All conduits must be fully supported throughout their length. Non-electrical attachments to a conduit are prohibited.
- 47) All electrical wiring and cables must be in good condition (no exposed circuits).
- 48) Extension cords must be used on a temporary basis only.
- 49) Ground Fault Circuit Interruption (GFCI) must be provided for wet locations.
- 50) 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.
- 51) All tools used for electrical work must be properly insulated.
- 52) Electrical-rated matting must be installed in front of all distribution panels in electric utility rooms.
- 53) Major modifications to new and existing facilities must be inspected to verify compliance with legal codes.

### Machine Safety

- 54) Suppliers shall develop and implement processes and procedures to reduce or eliminate the risk associated with injuries due to unsafe machinery.
- 55) Suppliers shall identify and implement physical control measures to reduce machinery risk (e.g., fixed guards, interlocks, two-hand controls).
- 56) 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.*
  - *Maintenance of 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 on-the-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 on-the-job instruction include maintenance operations.*
  - *Machine disposal plan.*
- 57) Suppliers shall ensure all employees working with machinery receive safety training upon initial hire that includes safe operating procedures, applicable PPE and protections against identified hazards.
- 58) Suppliers shall ensure assigned maintenance personnel are trained and qualified for machine maintenance.
- 59) Suppliers shall ensure diamond scaifes used for cutting and polishing are guaranteed as cobalt-free.



### Personal Protective Equipment (PPE)

- 60) 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.*
- 61) Suppliers shall ensure all personal protective clothing and equipment are 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 and Health), ANSI (American National Standards Institute) or country standards.
- 62) 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 and 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.*

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- *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.*
- 63) Head protection must be furnished to and used by all employees and contractors engaged in construction and other miscellaneous work.
- 64) Safety shoes or boots with impact protection are required to be worn when carrying or handling materials such as packages, objects or parts of heavy tools that could be dropped, and for other activities where objects might fall onto the feet.
- 65) Suitable gloves must be worn when hazards from chemicals, cuts, lacerations, abrasions, punctures, burns, biologicals and harmful temperature extremes are present.
- 66) 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.
- 67) Suppliers shall ensure the PPE is maintained in clean, good working condition and is stored properly and regularly inspected and replaced when needed.
- 68) 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.*
- 69) 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.
- 70) 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.
- 71) Suppliers shall not require employees to pay for PPE that is necessary to safely perform their job functions.

### ***Respiratory Protection and Equipment (RPE)***

- 72) Suppliers shall develop and implement a respiratory protection program to protect employees and on-site contractors from overexposure to regulated chemicals or other particulates that could affect their respiratory system.
- 73) 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.
- 74) 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, mist, fog, smoke, vapors, gases or radioactive material must be identified as potential situations requiring respiratory protection.*
  - *Determination of eligibility and medical evaluation requirements to wear a respirator.*

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- *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.*
- 75) 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).
- 76) Suppliers shall ensure that all employees using a negative or positive pressure tight-fitting facepiece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT).
- 77) 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.*
- 78) Suppliers shall ensure all filters, cartridges and canisters used in the workplace are appropriate for the environment in which they are used and labeled and color-coded (e.g., the NIOSH approval label).
- 79) Suppliers shall ensure that filters, cartridges and canisters are monitored and changed based upon a pre-determined schedule with consideration for contaminant type and related exposures.
- 80) 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.*
  - *Use in emergency situations.*
  - *Recognition of medical signs and symptoms that may limit or prevent effective use.*

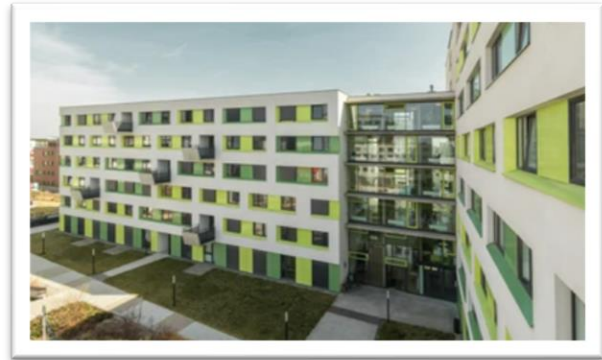
### **Ergonomics**

- 81) 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.*
- 82) 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's ergonomics program.*

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### *Dormitories and Housing*

- 83) Suppliers shall ensure all provided dormitories or housing are maintained as safe, hygienic and healthy.
- 84) Suppliers shall develop and implement processes and procedures to reduce or eliminate the risk of operating and maintaining dormitory or other housing facilities.
- 85) Suppliers shall ensure housing is structurally sound, in good repair, secure and provides safe protection to occupants against the elements.
- 86) Suppliers shall ensure that housing has appropriate response capabilities from local emergency response personnel including fire, medical and police agencies.
- 87) Suppliers shall provide for a minimum of four (4) square meters (13 square feet) of living space per occupant with provisions for private storage of personal effects for each individual held therein.
- 88) Suppliers shall provide adequate lighting and electric services to all living areas.
- 89) Suppliers shall provide for the sanitary collection and disposal of garbage.
- 90) Suppliers shall provide individual beds, cots or bunks to each occupant.
- 91) Suppliers shall ensure any bedding materials provided by the facility are clean and sanitary.
- 92) Suppliers shall ensure separate sleeping areas are provided for each gender, except in cases where families are housed together.
- 93) Suppliers shall ensure that toilet facilities are:
- *Provided at a ratio of one toilet for every 15 occupants.*
  - *Within 50 meters (164 ft) of each living unit.*
  - *Separated by gender and marked as such.*
  - *Cleaned and sanitized daily.*
- 94) Suppliers shall ensure that all shower and washing areas are:
- *Equipped with pressurized, hot and cold potable (drinkable) water.*
  - *Within 50 meters (164 ft) of each living unit.*
  - *Separate for each gender type and marked as such.*
  - *Constructed of nonabsorbent materials and sanitized daily.*
- 95) Suppliers shall ensure that sanitary eating and food preparation areas are provided.
- 96) 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.
- 97) Suppliers shall ensure fire extinguishing equipment is provided in a readily accessible location not more than 30 meters (98 ft) from each living area.
- 98) Suppliers shall ensure a minimum of two (2) exits clearly marked are provided for each floor.
- 99) Suppliers shall ensure biannual fire drills are conducted and documented.
- 100) Suppliers shall ensure first-aid kits are always provided and readily accessible for use at a ratio of one kit per 50 occupants.
- 101) Any hazardous chemicals must be stored only in designated areas.



### *Canteen and Food Services*

- 102) 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.
- 103) All areas of food preparation shall meet the hygiene and sanitary standards specified in applicable laws and regulations.

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- 104) 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.

### *Management of Contractors*

- 105) Suppliers shall develop and implement processes and procedures to reduce or eliminate health, safety and environmental risk associated with the on-site contractor and subcontractor activities.
- 106) Suppliers shall maintain qualification processes for any contractor or subcontractor performing equipment or facility maintenance or 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.*
- 107) Suppliers shall conduct a contractor/subcontractor pre-job review and orientation which includes, at a minimum:
- *Orientation of facility including emergency exits, alarm recognition and actions to take in 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, clean-up and disposal requirements.*
  - *Incident reporting.*
  - *Provisions of noncompliance.*





## PROTECTING LOCAL COMMUNITIES

AS A RESPONSIBLE AND COMMITTED GROUP PRESENT AROUND THE WORLD, TIFFANY STRIVES TO HAVE A POSITIVE INFLUENCE ON THE SOCIETIES AND REGIONS IN WHICH IT OPERATES AND PREVENT ANY DAMAGE TO LOCAL COMMUNITIES; AND IT REQUIRES ITS SUPPLIERS TO APPLY THE SAME BEHAVIOR. WHEN OPERATING WITH INDIGENOUS COMMUNITIES, AS DEFINED BY THE UNITED NATIONS DECLARATION ON THE RIGHTS OF INDIGENOUS PEOPLES, SUPPLIERS MUST SEEK FREE, PRIOR, AND INFORMED CONSENT (FPIC) AND ENSURE THEIR HUMAN RIGHTS CAPACITY.

### Management Systems

- 1) Supplier shall, 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 policies and procedures 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.

### General Requirements

- 2) When operating with indigenous communities, as defined by the United Nations Declaration on the Rights of Indigenous Peoples, Suppliers must seek the Free, Prior and Informed Consent (FPIC) and ensure their human rights capacity.
- 3) Supplier shall 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 and safety*
  - *Land acquisition and involuntary resettlement*
  - *Biodiversity conservation and sustainable management of living natural resources*
  - *Indigenous peoples*
  - *Cultural heritage*

### Stakeholder Engagement

- 4) Identify stakeholders (groups and individuals, including community members, rights holders and others) who may be affected by or interested in the Supplier's project or business activities.
- 5) Develop a stakeholder engagement plan that is scaled to the risks and impacts of the applicable project and/or business activities.
- 6) Consult with stakeholders to design engagement processes.
- 7) Begin engagement process prior to or during activity planning and maintain throughout the life of the project and/or business activities.
- 8) 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 supplier has considered and/or addressed its impacts.*
- 9) 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.
- 10) Ensure mechanisms are accessible to all stakeholders, accounting for language and other potential barriers to effective engagement, and are culturally appropriate.

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- 11) Demonstrate that efforts have been made to include the participation by women, men, and marginalized and vulnerable groups or their representatives.
- 12) 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.
- 13) Document engagement processes, including, at minimum, names of participants and input received from, and company feedback provided to, stakeholders.
- 14) Report back to affected communities and stakeholders on issues raised during engagement processes.
- 15) 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.





## ENVIRONMENTAL COMPLIANCE AND PERFORMANCE

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TIFFANY HAS ESTABLISHED AN ENVIRONMENTAL STRATEGY AND TAKES CONCRETE MEASURES TO PROTECT THE ENVIRONMENT WITHIN THE SCOPE OF A SPECIFIC PROGRAM WHICH INCLUDES COOPERATION WITH ITS SUPPLIERS TO ENSURE APPLICATION OF BEST PRACTICES THROUGHOUT THE SUPPLY CHAIN.

TIFFANY EXPECTS ITS SUPPLIERS TO SHARE THIS COMMITMENT. IT ENCOURAGES INITIATIVES BY ITS SUPPLIERS TO REDUCE THE ENVIRONMENTAL IMPACT OF THEIR ACTIVITIES, NOTABLY THROUGH THE USE OF GREEN TECHNOLOGIES AND SHARING ENVIRONMENTAL FIGURES WITH TIFFANY WHEN NEEDED.

TIFFANY REQUIRES THAT ITS SUPPLIERS RESPECT APPLICABLE LOCAL AND INTERNATIONAL ENVIRONMENTAL LAWS, REGULATIONS AND BEST PROFESSIONAL STANDARDS; OBTAIN ALL REQUISITE ENVIRONMENTAL PERMITS; AND BE ABLE TO PROVE EFFECTIVE IMPLEMENTATION OF THE FOLLOWING.

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### *Management Systems*

- 1) Application of an environmental management system (such as Leather Working Group certification for tanneries, Zero Discharge of Hazardous Chemicals program for fashion and leather goods Suppliers or ISO 14001 certification).
- 2) Improvements in the environmental performance of their sites and production resources—in particular, through proper waste management; elimination of air, wastewater and soil pollution (including aquifers); and the reduction of water and energy consumption and greenhouse gas emissions, with an emphasis on use of renewable energies, and measures to track and reduce or avoid greenhouse gas emissions.
- 3) Suppliers shall strive for continuous improvements in the environmental performance of their sites and production resources, through proper waste management; elimination of air, wastewater and soil pollution (including aquifers); reduction of greenhouse gas emissions with an emphasis on use of renewable energies; and reduction of water and energy consumption.
- 4) Measures shall be taken to ensure that workers whose activities have direct environmental impact are trained, skilled and have the resources required to effectively perform their work in consideration of any environmental commitments.

### *Raw Materials, Components and Products Requirements*

- 5) Measures shall be taken to contribute to the continuous improvements in environmental performance throughout the lifecycle of the products of Tiffany. For instance, Suppliers are committed to share with Tiffany the most responsible options (certified materials, recycled materials, materials sourced with regenerative agriculture practices, etc.), when reasonably available.
- 6) Finished or semi-finished products bearing distinctive trademarks, design rights or other intellectual property assets belonging to Tiffany that have not been ordered or have been refused should be managed as instructed by the relevant contact person within Tiffany.
- 7) Measures to ensure safe chemical management and chemical compliance of products and raw materials with either applicable national and international regulations and best professional standards, including the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulations and Tiffany & LVMH Restricted Substances List.
- 8) Measures to preserve biodiversity and ensure compliance with relevant environmental international standards and regulations such as the Convention on International Trade in Endangered Species (CITES).
- 9) Measures to ensure zero illegal deforestation and zero deforestation in high-risk areas.
- 10) Measures to guarantee traceability and compliance for raw materials and substances used, as well as to share information with regard to raw material origin.
- 11) Measures implemented across the supply chain to respect animal welfare and implementation of the requirements defined in LVMH Animal-based Raw Materials Charter.



## ETHICS AND BUSINESS INTEGRITY REQUIREMENTS

TIFFANY REQUIRES EXEMPLARY INTEGRITY FROM ITS SUPPLIERS IN THE CONDUCT OF THEIR BUSINESS ACTIVITIES. TIFFANY EXPECTS ITS SUPPLIERS TO ACT IN FULL COMPLIANCE WITH APPLICABLE LOCAL, NATIONAL AND INTERNATIONAL LAWS AND REGULATIONS IN THE CONDUCT OF THEIR BUSINESS, IN PARTICULAR IN THE FOLLOWING AREAS: PROHIBITION OF CORRUPTION AND MONEY-LAUNDERING, RESPECT OF COMPETITION, PREVENTION OF INSIDER TRADING AND PROTECTION OF PERSONAL INFORMATION.

### *Management Systems*

- 1) Supplier shall maintain written policies and procedures to ensure business practices meet the highest standards with regards to ethics and business integrity.
- 2) Suppliers shall ensure employees (and any Tiffany-approved subcontractors) are appropriately trained, qualified, and have the resources to ensure ongoing compliance.

### *General Requirements*

- 3) Tiffany applies a zero-tolerance policy concerning corruption and influence peddling. Tiffany expects its Suppliers to take appropriate measures to prevent, detect and discipline any corruption or influence peddling, directly or indirectly, across the scope of their activities. This includes a prohibition of so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.
- 4) Gifts or invitations may be considered acceptable expressions of courtesy within the context of good business relations as long as they are limited in scope and value, given openly and transparently, permitted under applicable law and regulations, customary in the location in which they would be given, provided to reflect esteem or gratitude, and not offered with an expectation that something will be offered in return. In some cases, these practices might be subject to anti-corruption regulations or other legal requirements, making it essential for Suppliers to commit to comply with applicable rules and regulations within the scope of their business relationship with Tiffany.
- 5) Tiffany requires its Suppliers to be committed to make every effort to prevent the occurrence of situations that create an actual, perceived or potential conflict of interest within the scope of their business relationship with Tiffany. 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.
- 6) Tiffany requires its Suppliers to take all appropriate measures to prevent their operations from being used as vehicles for money-laundering. This includes maintaining a money-laundering policy in accordance with the standards of the markets in which they operate.
- 7) Suppliers commit to take all appropriate measures to prevent abuse of dominant position, concerted practices or unlawful agreements between competitors, such as the setting of prices or price ranges (price fixing) or market allocations or boycotts limiting the production of certain products.
- 8) The LVMH Group requires its Suppliers to refrain from selling or buying shares in LVMH – Moët Hennessy Louis Vuitton SE (“LVMH shares”), as well as any derivatives or any other financial instruments linked to LVMH shares, based on inside information, either directly or indirectly.
- 9) Tiffany requires its Suppliers to commit to taking all necessary measures to guarantee the confidentiality of professional secrets and other non-public information they receive in the course of their business relationship with Tiffany.
- 10) Tiffany requires its Suppliers to take all appropriate measures to comply with all applicable laws and regulations concerning the protection of personal information.
- 11) Tiffany requires its Suppliers to comply with applicable customs laws and regulations, including those relating to imports and the ban on transshipment of merchandise to the importing country.
- 12) Tiffany requires its Suppliers to respect all applicable international trade restrictions and economic and trade sanctions, taking into account any changes in these measures, as well as all applicable laws and regulations concerning export and import controls.
- 13) In particular, Suppliers may not source materials for Tiffany, directly or indirectly, from: (1) territories subject to

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embargoes under United States or European Union trade control, export control, non-proliferation, anti-terrorism or similar laws, including Cuba, Iran, North Korea, Syria, Venezuela or the Crimea, and the Donetsk and Luhansk regions of Ukraine, (2) countries subject to sanctions under United States or European Union trade control, export control, non-proliferation, anti-terrorism or similar laws, including Russia, Belarus, Nicaragua, Myanmar, the Democratic Republic of Congo or the Xinjiang Uyghur Autonomous Region of the People's Republic of China or (3) persons or entities on (or 50% or more owned by or acting on behalf of persons or entities on) restricted lists established under United States or European Union trade control, export control, non-proliferation, anti-terrorism or similar laws. Upon request, Suppliers must provide warranties confirming that materials been sourced for Tiffany in accordance with the foregoing and must inform Tiffany if becoming aware of an embargoed or sanctioned person or country being involved in any transaction conducted for Tiffany.

- 14) Suppliers are required to take all necessary measures to protect the resources and assets of Tiffany; in particular, their brand image and intellectual property rights.
- 15) Tiffany expects its Suppliers to be extremely attentive to their public statements, particularly on the internet and in social media, and to ensure that none of those statements be attributed to Tiffany or their shareholders, directors, officers or employees, and are consistent with Suppliers' commitment to both confidentiality and respect of professional secrets.
- 16) Suppliers are required to provide clear and accurate information regarding the methods and resources used, production sites, and characteristics of the products or services supplied, and to refrain from making any misleading claims.
- 17) Suppliers shall adhere to these expectations and any other ethics or compliance related contractual obligations with Tiffany and apply the same standards throughout their entire supply chain.

### *Government Entities and Officials*

- 18) Suppliers that interact with government entities and officials must adhere to additional best practices related to meetings, gifting and invitations, such as:
  - *Do not offer, promise or give anything of value to a government official (or their spouse or family) either directly or through a third-party with the intention of improperly influencing or inducing any act, decision or failure to act, or securing an improper benefit. This includes current, former or prospective government officials and their family members.*
  - *Promptly log (and provide logs to Tiffany of): (1) all interactions with government-owned entities or officials (including location of meeting, topics discussed, attendees and anything exchanged), and (2) all payments to government-owned entities and officials (including business justification).*
  - *Handle official business in official locations.*
  - *Do not go to meetings with government officials alone. Discussions with government-owned entities or officials on behalf of Tiffany must include a Tiffany representative.*
- 19) Suppliers must inform and seek Tiffany's approval prior to engaging with a government-owned entity or official on Tiffany's behalf for any reason.
- 20) Suppliers must inform Tiffany of any personal relationships that they or a relevant other may have with a government entity or official.



## SUPPLIER GRIEVANCE MECHANISMS & ALERTLINES

SUPPLIERS MUST ESTABLISH PROCESSES OR MECHANISMS BY WHICH WORKERS AND STAKEHOLDERS CAN RAISE ISSUES OF CONCERN WITHOUT FEAR OF RETALIATION OR NEGATIVE IMPACT.

### Management Systems

- 1) Suppliers shall maintain policies and procedures to support a functioning and credible grievance mechanism available to employees to respond to concerns and complaints that ensure effective, respectful and transparent communication among workers, their representatives, management and the community, when applicable.
- 2) Suppliers shall communicate the grievance policy to employees so that employees are aware of the grievance process and their right to raise concerns.
- 3) Suppliers shall train staff responsible for responding to grievances regarding the policy and their roles and responsibilities.
- 4) Suppliers shall document and track grievances to ensure there is a timely response back to the employee where possible.

### General Requirements

- 5) 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 the supplier’s investigations into claims and associated actions, where appropriate.*
  - *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/availability to a means of an appropriate remedy/solution to a grievance.*

### AlertLines

Suppliers who become aware of violations (or risk of violation) of this Supplier Code of Conduct and Guidance document, as well as of applicable laws and regulations, are invited to raise their concern to their contact person(s) at Tiffany. In addition to this channel for raising ethical and other concerns, Suppliers have access to both the Tiffany and the LVMH AlertLines. Both interfaces provide confidential and secure ways of reporting in good faith violations (or risk of violation) of the Code, guidelines, principles and policies, and/or applicable laws. A Supplier’s relationship with Tiffany will not be affected by a report of potential misconduct made in good faith.

#### The Tiffany AlertLine

Is open to Tiffany’s employees and other external stakeholders. The Tiffany AlertLine can be accessed through Tiffany.com or directly at: <https://tiffany.ethicspoint.com>.

#### The LVMH AlertLine

Is also open to LVMH Group’s employees and other external stakeholders. The LVMH AlertLine can be accessed through LVMH.com or directly at: <https://alertline.lvmh.com>.



## CONTROL AND ACCESS TO INFORMATION

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TIFFANY EXPECTS ITS SUPPLIERS TO ENSURE THAT ADEQUATE AND EFFECTIVE MANAGEMENT SYSTEMS, POLICIES, PROCEDURES AND TRAINING ARE IN PLACE TO ENSURE ONGOING COMPLIANCE WITH THE CODE.

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### *General Requirements*

- 1) Tiffany reserves the right to control compliance with the principles set forth in the Code. These controls will be performed by Tiffany or duly mandated third parties. Any control or audit will be related to the business relationship between Tiffany and the Supplier. If a Supplier is subject to specific professional obligations pursuant to law, any control or audit will be carried out taking into consideration these professional obligations. Suppliers must commit to improving or correcting any deficiencies identified. Tiffany may also support Suppliers in implementing and applying best practices in order to resolve nonconformity issues.
- 2) Tiffany Suppliers are responsible for ensuring that the Code and Guidance are understood and followed throughout their operations and must, accordingly, share the Code with all workers in all applicable local languages and self-monitor.
- 3) Suppliers are also responsible for ensuring that any approved subcontractors understand and comply with the Code and Guidance. During any control or audit authorized under “Control and Access to Information” of the Code, Tiffany requires the Supplier’s workers to be free to communicate outside the presence of management and without the threat of reprisal.
- 4) While Tiffany seeks to work collaboratively with its Suppliers towards continuous improvement in responsible business practices, Tiffany reserves the right to cancel outstanding purchase orders, suspend future purchase contracts or terminate its relationship with a Supplier where circumstances demand.
- 5) Suppliers shall provide upon request any supporting documentation or information attesting full compliance with the code.



## SECURITY

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TIFFANY REQUIRES ITS SUPPLIERS TO ENSURE THE SAFETY AND SECURITY OF ALL WORKERS AND VISITORS. SUPPLIERS SHALL ASSESS SECURITY RISKS AND ESTABLISH MEASURES TO PREVENT 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 THEIR SECURITY OPERATIONS, INCLUDING IN INTERACTIONS AMONG SECURITY PERSONNEL, WORKERS AND VISITORS. SUPPLIERS ARE ENCOURAGED TO ALIGN WITH THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS WHERE APPLICABLE.

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### *Management Systems*

- 1) Suppliers shall assess safety and security risks to employees, visitors, product, intellectual property, employee or customer personal information, and risk of unauthorized access.
- 2) In response to identified risks, Suppliers shall maintain policies and procedures to always ensure safety and security.
- 3) Suppliers shall provide appropriate training to employees and responsible staff for security and safety and maintain related records.

### *General Requirements*

- 4) Suppliers shall ensure the safety and security of all workers and visitors as a number one priority.
- 5) 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.
- 6) Suppliers shall ensure protection from theft of product, intellectual property and employee or customer personal information, as well as from loss, damage or substitution of product, while on site, off site or in transit.
- 7) 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 Supplier and public and private security*
    - *Security arrangements*
    - *Deployment of conduct and training*
    - *Consultation and advice*
    - *Responses to human rights abuses*



## TRACEABILITY AND DUE DILIGENCE

TIFFANY'S MANUFACTURING AND SUPPLY CHAIN PARTNERS ARE ENCOURAGED TO MEET THE STANDARDS OF THE OECD DUE DILIGENCE GUIDANCE AND ACHIEVE FULL TRACEABILITY THROUGHOUT THEIR SUPPLY CHAINS. THEY SHALL ALSO FOLLOW TIFFANY'S SUPPLY CHAIN POLICIES AND REQUIREMENTS INCLUDING, TO THE EXTENT APPLICABLE, TIFFANY SOURCE WARRANTY PROTOCOL.

### Management Systems

- 1) Suppliers shall maintain policies and procedures to ensure traceability and due diligence of their supply chains and follow associated Tiffany supply chain policies and requirements.
- 2) Suppliers shall train applicable employees and maintain detailed records needed to demonstrate traceability and due diligence.

### General Requirements

- 3) Manufacturing and supply chain partners shall take steps to ensure transparency throughout their supply chains.
- 4) 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, not conflict. The OECD Guidance document can be found at: <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>*
- 5) 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.
- 6) 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.
- 7) Suppliers shall strive to seek out and engage with credible certification programs that incorporate traceability expectations.
- 8) Tiffany strongly encourages continuous improvement and management systems to improve environmental issues. For suppliers that have received third-party certifications, such as ISO14001, Responsible Jewellery Council (RJC) and Initiative for Responsible Mining (IRMA), Tiffany will take into consideration the applicability of those certification systems and how they align with our requirements.



## RESPONSIBLE MINING

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WHILE TIFFANY AND MANY OF OUR SUPPLIERS DO NOT OWN OR OPERATE ANY MINES, MANY OF OUR PRODUCTS RELY ON MINED MATERIALS. WE BELIEVE THAT 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.

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## DEFINITIONS

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### GENERAL

**Applicable law:** All the international, national, state and local laws in the 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:** A state of being in accordance with established guidelines, specifications, or legislation.

**Employees:** 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.

**Government official:** An executive, director, official, officer, employee, minister or agent of any (i) governmental department, agency or instrumentality, (ii) wholly or partially government-owned or -controlled company, authority or business, (iii) political party or (iv) public international organization (for example, the International Monetary Fund or the World Bank), any member of a royal or ruling family, any candidate for political office, and for the purpose of Tiffany's requirements, any known spouse or family members of any of the foregoing.

**Human rights:** 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.

**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:** Statements of intentions and directions of an organization as formally expressed by its top management.

**Remedy:** A 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 had the impact not occurred. Where this is not possible, it can involve compensation or other forms of resolution.

**Rights holders:** 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:** A 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.

**The Code:** The LVMH Code of Conduct and Tiffany Addendum.

**The Guidance:** The Guidance document that defines supplementary expectations of the LVMH Code of Conduct and Tiffany Addendum.

**Traceability:** 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:** Groups of people characterized by their higher risk and reduced ability to cope with shock or negative impacts. Their vulnerability may be based on socioeconomic condition, gender, age and/or disability.

# TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

## LABOR

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

**Collective bargaining:** The negotiation of wages and other conditions of employment by an organized body of employees.

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

**Forced labor:** 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:** 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:** Obtaining labor or services through force, fraud, coercion or equivalent conduct that would reasonably overbear the will of the person for the purposes of forced labor or commercial sex.

**Labor agents:** 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:** Workers that move to another country or area within the same country in order to find employment—most commonly for seasonal or temporary work.

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

**Sexual harassment or abuse:** Behavior that 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 one-year duration or less.

**Source of material:** 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 is 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:** 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.

**Young Workers:** Those workers between the minimum age of employment and 18 years old.

# TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

## HEALTH AND SAFETY

- Air-purifying respirator:** 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:** 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:** 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:** 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:** An element or mixture of elements or synthetic substances that are considered harmful to employees.
- Indoor air quality:** 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:** Unsafe conditions that can cause injury, illness and death (e.g., unguarded machinery, working at height, electrical hazards, heat, noise, and slip and trip hazards).
- Potable water:** Water that is clean and healthy to drink.
- Safety Data Sheets (SDS) or Material Safety Data Sheets (MSDS):** Standardized documents containing comprehensive occupational safety and health data to communicate potential health and environmental hazards, recommended protective measures, as well as safety precautions for proper storage and handling.
- 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:** Anything the factory produces that is released into the atmosphere—including fumes, vapors, dust, smoke, etc.—that could potentially cause harm to people or the environment, including ecosystems.
- Composting:** The controlled biological decomposition of organic material.
- Direct discharge:** The discharge of wastewater to the environment (onto land, into the ocean or into a freshwater body such as a lake or stream).
- Energy recovery:** 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:** 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:** 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:** 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:** Wastewater from industrial processes.
- Pollutants:** Any substances introduced into the environment that adversely affect the usefulness of a resource.
- Pollution control devices:** 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:** The reduction of contaminants in raw wastewater prior to the indirect discharge of the wastewater.
- Sludge:** Solid or semisolid material that is (a) generated as a byproduct from biological wastewater treatment processes, or (b) is produced during manufacturing processes.

## TIFFANY & CO. SUPPLIER CODE OF CONDUCT GUIDANCE

**Storm freshwater:** Freshwater that accumulates from precipitation during a storm event.

**Water emission sources:** Anything the factory produces that is released into water, including runoff, spills or discharge.