

RICHEMONT

Supplier Code of Conduct

Richemont owns several of the world's leading Maisons and companies in the field of luxury goods and has a long-standing commitment to doing business responsibly.

Richemont's Supplier Code of Conduct, which supports this commitment, consists of 39 Principles covering General Requirements, Responsible Supply Chains, Labour Practices and Human Rights, Environment, Sustainable Product Development, and Application and Compliance.

We require that our suppliers adhere to this Code of Conduct and ensure the compliance of their own operations with all its applicable principles. We also expect that our suppliers communicate and encourage their own contractors and vendors to incorporate these principles into their business policies and practices.

To ensure the requirements of this Code of Conduct are consistently met and that conformance with the Code can be verified, we expect our suppliers to put in place appropriate management systems and business processes. Suppliers acknowledge that we may conduct monitoring visits or require third party audits to both verify compliance and support continuous improvement.

For the purposes of this Code, any references to Richemont shall also apply to its individual Maisons and companies. If suppliers have any questions relating to how to apply the principles and practices outlined below, they are advised to contact their relationship manager.

Overview of the Code

The section below provides an overview of the 39 Principles included in this Code of Conduct. A summary version is provided on the following page followed by the full text of the Code. Suppliers are expected to read and fully understand the detail of these principles as described in the sections that follow.

General Requirements

1. General Laws & Regulations
2. Business Integrity
3. Anti-corruption
4. Money Laundering
5. Anti-trust
6. Product Disclosure
7. Country of origin of product components
8. Security
9. Grievance Procedure & Whistleblowing

Responsible Supply Chains

10. Endangered Species
11. Diamond Policy
12. Gold and/or Platinum Group Metals
13. Forest Products
14. Coloured Gemstones
15. Fragrances
16. Animal Welfare
17. Community Impact

Labour Practices and Human Rights

18. General Laws, Regulations and Performance
19. Human Rights
20. Indigenous People

21. Discrimination
22. Discipline and Harassment
23. Forced Labour
24. Child Labour
25. Wages and Benefits
26. Work Hours
27. Freedom of Association
28. Health and Safety

Environment

29. General Laws, Regulations and Performance
30. Air Emissions
31. Water and Wastewater
32. Hazardous Substances
33. Hazardous and Non-Hazardous Waste
34. Energy Usage and Greenhouse Gas (GHG) Emissions
35. Biodiversity

Sustainable Product Development

36. Sustainable Product Development

Application and Compliance

37. General compliance
38. Evaluation
39. Non-compliance

Summary of Supplier of Code of Conduct: The 39 Principles in Action

General Requirements

1. Comply with applicable laws and regulations
2. Adhere to a high ethical standard
3. Not engage in any form of corrupt practices, including extortion, fraud, or bribery
4. Not engage in money laundering or the financing of terrorism
5. Act in compliance with anti-trust regulations
6. Disclose the material characteristics of products and health and safety information
7. Be able to provide information on country of origin and sources of components and raw materials
8. Ensure the physical integrity and security of employees and cash-convertible valuables
9. Have in place proper grievance and whistleblowing procedures

Responsible Supply Chains

10. Comply with applicable conventions and regulations, including the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
11. Adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council voluntary system of warranties
12. Take steps to assure that gold and/or platinum group metals supplied to Richemont – from all sources – meet international standards for responsible business practices and is conflict-free
13. Commit to using responsibly sourced paper, packaging and other timber-based products
14. Make all reasonable efforts to assure gemstones supplied to Richemont are mined in a manner that respects human and labour rights, is conflict-free and does not inflict environmental damage
15. Ensure that fragrance compounds, formulae and packaging components are safe and comply with applicable laws worldwide
16. Adhere to ethical practices regarding animal welfare in accordance with the Responsible Luxury Initiative Animal Sourcing Principles
17. Support the development of communities involved in the supply chain where possible

Labour Practices and Human Rights

18. Uphold the United Nations Universal Declaration of Human Rights, and the Eight Fundamental International Labour Organisation Conventions

19. Respect fundamental Human Rights, as according to the United Nations Guiding Principles on Business and Human Rights
20. Recognise and respect the rights of indigenous peoples and the value of their traditional, cultural and social heritage
21. Prohibit discrimination on any basis
22. Prohibit the use of corporal punishment, degrading treatment, harassment, abuse, coercion or intimidation in any form
23. Adhere to applicable employment laws and regulations regarding slavery and human trafficking
24. Prohibit the use of child labour
25. Ensure that employees are paid, in line with industry standards and applicable legal minimum wage laws and/or collective agreements
26. Ensure normal working hours comply with the International Labour Organisation conventions
27. Allow workers to associate freely
28. Commit to high standards of health and safety

Environment

29. Conduct businesses in an environmentally responsible manner, ensuring compliance with relevant legal requirements, environmental norms and specific industrial environmental regulations
30. Ensure compliance of air emissions from operations with relevant legal requirements
31. Practice good water stewardship
32. Meet legal requirements relating to the use of hazardous substances
33. Ensure compliance of safe handling, storing, and transportation of waste
34. Understand energy consumption and takes steps to reduce Greenhouse Gas (GHG) emissions
35. Protect biodiversity and sensitive habitats

Sustainable Product Development

36. Factor in appropriate environmental and social considerations into the full lifecycle of processes, technologies, products and packaging

Application and Compliance

37. Communicate the principles of the Supplier Code of Conduct to employees, sub-contractors and relevant third parties
38. Cooperate and facilitate the evaluation of adherence to the Supplier Code of Conduct
39. Report concerns directly to Richemont's Head of Internal Audit at: whistle.blowing@richemont.com

The full details of each principle are provided on pages 3 to 9 of the Code below. Suppliers are expected to indicate acknowledgement of the specific terms of the Code on page 10.

GENERAL REQUIREMENTS

Principle 1 – General Laws & Regulations

Suppliers shall comply with applicable laws and regulations relating to their activities and the countries in which they operate. Where there are differences or conflicts with this document and local law, the higher standard should prevail.

Suppliers shall ensure that any production, delivery or other action subject to obtaining specific governmental, legal or regulatory permissions is only to be undertaken when those permissions have been granted.

Principle 2 – Business Integrity

Suppliers shall adhere to a high ethical standard, and ensure integrity, transparency and conformance with applicable laws and standards of this Code of Conduct.

We encourage suppliers to establish a policy that describes their commitment to corporate responsibility.

Suppliers shall act in a manner that promotes trust by ensuring that their business conduct (in particular related to the protection of trade secrets and intellectual property) contributes to credible, stable and sustainable business relationships.

Principle 3 – Anti-corruption

Suppliers shall not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

Suppliers shall:

- Prohibit bribery and corruption in all business transactions, as such that may compromise the principles of fair competition or constitute an attempt to obtain or retain business or influence the course of business or governmental decision-making processes;
- Not allow any employee to suffer negative consequences for voicing a concern or refusing to engage in an act of bribery;
- Prohibit acceptance of payments, gifts in kind, expenses, discounts, advantages or promises such that may influence the course of business decisions;
- Have appropriate systems in place to manage bribery risk;
- Not offer to their contacts within Richemont any inducements, rewards, kickbacks, gifts, bribes or other payments that may compromise the making of objective and fair business decisions.

Principle 4 – Money Laundering

Richemont will not tolerate money laundering or the financing of terrorism.

Suppliers shall comply with the applicable national and/or international accounting and banking standards and processes, as well as law with respect to money laundering, financing of terrorism, fraud, and other illegal activities.

Principle 5 – Anti-trust

Suppliers shall act in compliance with anti-trust regulations. Suppliers shall not seek to make use of membership in trade organisations to obtain or exchange commercially sensitive information in contradiction to competition laws and regulations.

Principle 6 – Product Disclosure

Suppliers shall disclose the material characteristics and health and safety information of the products that they supply to Richemont in compliance with the relevant trading standards legislation, and where they exist, specific national or international regulations and generally accepted industry guidelines.

Principle 7 – Country of origin of product components

Suppliers may be asked to provide Richemont with information as to the country of origin and the sources of components and raw materials included in the products being delivered.

Suppliers should therefore maintain reliable information, including any changes, regarding the origin and composition of products being supplied.

Principle 8 – Security

Suppliers shall ensure the safety and security of employees in their operations.

Suppliers shall ensure the physical integrity and security of cash-convertible valuables in their operations and during transportation to or from their operations to avoid the encouragement of fraud, crime and related anti-social behaviour.

Principle 9 – Grievance Procedure & Whistleblowing

Suppliers shall have in place proper grievance and whistleblowing measures to allow employees to report actual or suspected misconduct without fear of reprisal.

Suppliers shall:

- Clearly communicate these measures to their employees;
- Allow employees acting individually or with other workers to submit a grievance without suffering any penalty or retaliation;
- Record, investigate and process employee grievances raised.

RESPONSIBLE SUPPLY CHAINS

Principle 10 – Endangered Species

Suppliers shall fully comply with special international and local regulations, in particular the Convention on International Trade of Endangered Species (CITES), regarding the procurement, import, usage and export of raw materials sourced from endangered or protected species.

Principle 11 – Diamond Policy

Suppliers shall adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council voluntary system of warranties, whose purpose is to put an end to conflict diamond trade, and to support similar future initiatives aiming to protect human rights and the integrity of their supply chain.

Suppliers shall:

- Provide only natural, non-treated diamonds from legitimate sources that strictly conform to Richemont's quality specifications;
- Ensure they have systems and controls in place to identify synthetics;
- Prohibit purchasing conflict diamonds or assisting others to do so;
- Provide a supplier statement of warranty on all invoices concerning diamonds received by Richemont;
- Encourage and support similar endeavours, for instance in the area of gemstones and precious metals;
- Ensure that employees that buy or sell diamonds are well informed about the Kimberley Process, government restrictions on the trade in conflict diamonds and their duty to abide by Richemont policy requirements;
- Regularly update their staff on the issue of conflict diamonds and Richemont policy in respect to diamond purchasing;
- Provide full and complete disclosure of the physical characteristics of the stones, in compliance with national and international laws and industry best practice.

Suppliers that are engaged in the cutting and polishing of Diamonds shall use cobalt-free Diamond-impregnated scaifes.

Where Richemont has purchased diamonds for suppliers to use in products supplied to Richemont, suppliers shall exclusively use those diamonds and not substitute them.

Principle 12 – Gold and/or Platinum Group Metals

Suppliers are required to demonstrate that they are taking steps to assure that the gold and/or platinum group metals supplied to Richemont - from all sources - meet international standards for responsible business practices and are conflict-free.

Richemont recognises the *Responsible Jewellery Council Code of Practices Certification* and the *Responsible Jewellery Council Chain of Custody Certification* as international best practice; other standards will be considered if their equivalence can be clearly demonstrated.

Suppliers shall provide assurance as far as possible that gold and/or platinum group metals being supplied have been mined responsibly in a manner that respects human and labour rights, is conflict-free and does not inflict environmental damage, either directly or through subsequent contamination from tailings or waste rock.

Principle 13 – Forest Products

Suppliers are requested to source paper, packaging and other timber-based products in a responsible manner, either recycled or from forests that are managed in an environmentally-friendly, socially-beneficial and economically-viable way.

Principle 14 – Coloured Gemstones

To the extent feasible under prevailing industry practices, suppliers shall ensure that gemstones are mined in a manner that respects human and labour rights, is conflict-free and does not inflict environmental damage. Suppliers shall respect applicable international sanctions related to the sourcing, trade and sale of gemstones irrespective of where those stones have been cut and from where they have been exported.

Suppliers shall provide full and complete disclosure of the physical characteristics of the stones (including detailed information on treatments), in compliance with national and international laws and industry best practice.

Principle 15 – Fragrances

Suppliers involved in the perfumes and cosmetics industry shall ensure that the fragrance compounds, formulae, packaging components or finished products they supply are safe for their intended use and comply with all applicable laws worldwide to the best of their knowledge.

Suppliers shall ensure perfumes, cosmetic products or ingredients supplied to Richemont have not been tested on animals for a perfume or cosmetic use.

Principle 16 – Animal Welfare

Suppliers shall adhere to ethical practices regarding animal welfare in accordance with the Responsible Luxury Initiative Animal Sourcing Principles as it relates to the catching, maintaining, breeding, raising, transportation, handling and slaughter of live animals, if applicable to the products the suppliers are manufacturing.

Principle 17 – Community Impact

Where possible, suppliers are encouraged to support the development of communities involved in their supply chain, contributing to their social and economic welfare.

LABOUR PRACTICES AND HUMAN RIGHTS

Principle 18 – General Laws, Regulations and Performance

Suppliers shall uphold the United Nations Universal Declaration of Human Rights, and the Eight Fundamental International Labour Organisation Conventions, as well as the following specific requirements, and generally act in a manner that respects the human and labour rights of their employees.

Principle 19 – Human Rights

Suppliers shall respect the fundamental human rights and dignity of the individual, as according to the United Nations Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances.

Suppliers, if operating in, or sourcing directly from a conflict-affected area, shall perform human rights due diligence to assess the heightened risks of adverse human rights impacts.

Suppliers operating in conflict-affected areas or finding any evidence of sourcing from conflict-affected areas must inform Richemont immediately.

Principle 20 – Indigenous People

Suppliers shall recognise and respect the rights of indigenous peoples and the value of their traditional, cultural and social heritage, and to expect their own suppliers to comply with this requirement.

Principle 21 – Discrimination

Suppliers shall prohibit discrimination based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, physical appearance, age, or any other applicable prohibited basis.

Suppliers shall:

- Not practice or condone any form of discrimination in the workplace on these bases;
- Observe the right to freedom of practice by employees of religious or cultural practices, as far as is reasonable;
- Provide appropriate training to all employees on a continued basis, in order for them to acquire, maintain and further develop their skills.

Principle 22 – Discipline and Harassment

Suppliers shall prohibit the use of corporal punishment under any circumstances and the use of degrading treatment, harassment, abuse, coercion or intimidation in any form.

Suppliers shall:

- Not make use of or condone such practices;
- Clearly communicate applicable disciplinary processes and procedures to employees;
- Ensure that grievance procedures and investigation processes are in place and are communicated to all employees.

Principle 23 – Forced Labour

Suppliers shall adhere to applicable employment laws and regulations and make information available regarding their efforts to address the issue of slavery and human trafficking.

Suppliers shall:

- Prohibit any use of forced, bonded, indentured or prison labour, and not restrict the freedom of movement of employees and dependents;
- Ensure that all work performed on behalf of ourselves within their operations is based on recognised employment relationships;
- Prohibit retaining original copies of employee personal documentation (such as identity papers), and not require any form of deposit or fee as a condition of employment;
- Monitor relationships with recruitment agencies for risks of human trafficking where appropriate.

Principle 24 – Child Labour

Suppliers shall prohibit the use of child labour in their operations in any country.

Suppliers shall employ young persons (younger than 18 and older than 15 years) only in well-defined circumstances (such as for the purpose of vocational training, or as extras in the holiday season) that are not harmful to the health, safety or morals of children under 18 and in accordance with applicable law. Vocational training employment will apply mainly to areas of traditional product craftsmanship.

Principle 25 – Wages and Benefits

Suppliers shall ensure that employees are paid with due regard to industry standards, including ensuring adherence to applicable legal minimum wage laws and/or collective agreements whichever is higher.

Suppliers shall:

- Compensate their employees fairly by providing a living wage that covers a worker's basic needs;
- Pay performance-based wages that are no less than the legal minimum wage for a normal work week;
- Compensate overtime hours at regular or premium rates, according to applicable legal requirements;
- Not make illegal deductions from wages for disciplinary purposes.

Principle 26 – Work Hours

Suppliers shall ensure normal working hours comply with the International Labour Organisation conventions, as well as national legislation or the prevailing industry standards.

Suppliers shall:

- Ensure normal working hours shall not on a regular basis exceed a maximum of 48 hours per working week;
- Ensure that the sum of the normal work week and overtime hours shall not exceed 60 hours in a week unless defined

otherwise by applicable law or permitted under a Collective Bargaining Agreement;

- Provide weekly rest and paid annual leave in accordance – at a minimum – with national legislation and applicable sector regulations, and will abide by all legally mandated provisions for leave, including maternity, paternity, and compassionate leave.

Principle 27 – Freedom of Association

Suppliers shall allow workers to associate freely.

Suppliers shall:

- Adhere to applicable law and collective bargaining agreements where such agreements exist;
- Support parallel means of dialogue such as the implementation of collective employee representation and robust and effective dialogue between management and employees where laws prohibit these freedoms.

Principle 28 – Health and Safety

Suppliers shall commit to high standards of health and safety in their operations.

Suppliers shall:

- Provide safe and healthy working conditions for all employees and on-site contractors in accordance with applicable laws and regulations, and will take appropriate measures to prevent accidents, injury, and health problems arising from or linked to the course of work activities, in their operations;
- Ensure that employees are aware of specific role-related health and safety risks and hazards, and action to be taken in the event of an accident;
- Offer workplaces that have sanitary facilities, access to safe potable drinking water, fire safety equipment, clearly marked, unlocked and unblocked emergency exits and escape routes, access to adequate power supply and emergency lighting, and which are adequately constructed and maintained to meet or exceed local building regulations;
- Ensure employees have access to a mechanism by which they can raise and discuss health and safety issues with management;
- Monitor health and safety issues and adequately address such issues that arise;
- Establish emergency procedures and evacuation plans for all reasonably foreseeable emergencies, which are accessible or clearly displayed, regularly tested (including evacuation drills), and periodically updated;
- Provide employees with clear, understandable information on health and safety, as well as with relevant training, updated on an adequate basis;
- Ensure that appropriate measures are employed to minimise the risk of employee contact with hazardous substances, through the use of protective equipment and gear, the use of appropriate containers, and posting of safety notices;
- Provide access to adequate on-site health and medical facilities, including clearly marked first-aid provisions and trained first-aid personnel, and have appropriate procedures in place for transportation to local medical facilities in the case of a medical emergency;
- Where applicable, provide safe and healthy on-site housing for employees that have sanitary facilities, access to safe potable drinking water, fire safety equipment, clearly marked, unlocked and unblocked emergency exits and escape routes, access to adequate power supply and emergency lighting.

ENVIRONMENT

Principle 29 – General Laws, Regulations and Performance

Suppliers shall conduct their businesses in an environmentally responsible manner by ensuring compliance of their operations with relevant legal requirements, environmental norms and specific industrial environmental regulations and have appropriate mechanisms in place to keep management and key staff up to date.

Suppliers are encouraged to make continuous improvement on minimising their environmental footprint, and shall ensure that all of their manufacturing sites, new construction projects and refurbishments comply with similar requirements.

Principle 30 – Air Emissions

Suppliers shall ensure compliance of air emissions from their operations with relevant legal requirements.

Suppliers shall:

- Obtain the necessary permits and demonstrate compliance with those permits where appropriate;
- Have procedures in place to monitor main point source emissions to air.

Principle 31 – Water and Wastewater

Suppliers shall practice good water stewardship.

Suppliers shall:

- Obtain the necessary permits and demonstrate compliance with those permits where appropriate;
- Have appropriate measures in place to minimise water consumption;
- Operate appropriate pollution prevention and control systems as it relates to wastewater effluent streams.

Principle 32 – Hazardous Substances

Suppliers shall meet legal requirements relating to the use of hazardous substances.

Suppliers shall:

- Prohibit the use of substances that are subject to national or international bans, such as hazardous substances restricted by the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) for their adverse effects on humans or the environment;
- Obtain the necessary permits and demonstrate compliance with those permits where appropriate;
- Ensure each of their operational sites maintain an inventory of hazardous substances with up-to-date Material Safety Data Sheets (MSDS);
- Have appropriate measures in place for the management, storage and transportation of hazardous substances;
- Ensure that employees use hazardous substances in a safe and appropriate manner;
- Seek to minimise the use of hazardous substances.

Principle 33 – Hazardous and Non-Hazardous Waste

Suppliers shall ensure compliance of safe handling, storing, and transportation of waste generated from their operations.

Suppliers shall:

- Ensure compliance with applicable laws and regulations for hazardous and non-hazardous waste, including obtaining permits where appropriate;
- Establish proper management procedures for the separation of hazardous and non-hazardous waste for storage as well as the safe handling, storing, and transportation of waste;
- Train employee in waste management procedures;
- Seek to minimise the quantity of hazardous waste produced through their operations, and to ensure that hazardous waste substances arising from operations are disposed of in a manner which prevents pollution of the surrounding land, water resources and atmosphere;
- Seek to minimise waste to landfill and encourage recycling.

Principle 34 – Energy Usage and Greenhouse Gas (GHG) Emissions

Suppliers shall understand their energy consumption and take steps to reduce the quantity of energy consumed and Greenhouse Gases (GHG) emitted from their operations, where feasible.

Principle 35 – Biodiversity

Suppliers shall:

- Identify Key Biodiversity Areas affected by their operations and use the mitigation hierarchy to avoid, minimise, rehabilitate or offset impacts on biodiversity and ecosystem services;
- Not explore or mine in World Heritage Sites and shall ensure that their activities do not negatively impact directly on adjacent World Heritage Sites;
- Have a process to identify nearby legally designated protected areas, and make decisions to proceed with exploration, development, operation and closure activities that take into account the presence of, and impact on, legally designated protected areas;
- Ensure there are no measurable adverse impacts on the criteria for which Critical Habitat was designated or on the ecological processes supporting those criteria.

SUSTAINABLE PRODUCT DEVELOPMENT

Principle 36 – Sustainable Product Development

Suppliers are encouraged to factor in appropriate environmental and social considerations into the full lifecycle of their processes, technologies, products and packaging in order to optimise the environmental performance of their products through the product lifecycle and maximise opportunities for positive social impact. Specifically and where feasible, the materials used for storage and transportation should be recyclable, renewable and reusable.

APPLICATION AND COMPLIANCE

Principle 37 – General compliance

Richemont expects its suppliers to communicate the principles of this Supplier Code of Conduct to their employees, sub-contractors and relevant third parties with whom they do business so as to ensure the principles are integrated into their operations.

To the extent that there may be a detrimental impact to the product or service supplied to Richemont, suppliers shall proactively report all existing or potential discrepancies between their current operations and the requirements set out in this Code along with proposed recovery and remedial action plans for consideration by Richemont.

Principle 38 – Evaluation

Richemont will be entitled to request information from its suppliers as to their compliance with the terms of this Supplier Code of Conduct.

Where necessary, Richemont may require a supplier to provide evidence of its compliance by way of independent verification or appropriate certification.

Richemont will have the right to have products and materials independently tested to establish whether the suppliers are in compliance with the terms of this Supplier Code of Conduct.

Richemont will be entitled to visit suppliers' production facilities and the facilities of their sub-contractors and suppliers, or have those visited by an independent third party verification company, to establish compliance with this Supplier Code of Conduct.

Principle 39 – Non-compliance

Richemont reserves the right to terminate business relationships with any supplier that violates this Code of Conduct or whose suppliers or sub-contractors violate this Code of Conduct.

Any individual who is concerned about actual or suspected misconduct with regard to the terms of this Supplier Code of Conduct may report their concerns directly to the Head of Internal Audit at: whistle.blowing@richemont.com.

SUPPLIER CODE OF CONDUCT ACKNOWLEDGEMENT OF TERMS

Company name: _____

Address: _____

Contact name: _____

Position: _____

Does your company have an individual responsible for implementation of the Richemont Supplier Code of Conduct?

If yes, please provide contact information.

Does your company have a code of conduct or similar standards to which your suppliers adhere?

If yes, please provide a copy.

The terms of the Richemont Supplier Code of Conduct are hereby accepted and agreed to:

By authorized signatories, with company stamp when applicable:

Date: _____