

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

Please note: the 2020 SRSP Report is completed **online** from the Signet Responsible Sourcing website, which requires a username and password to access.

This is a copy of the full SRSP report to help you gather information and prepare your responses prior to completing the online report. You are not required to answer questions for any metal or mineral for which you do NOT supply Signet.

**For example:** if you only supply Signet with jewelry products containing “Gold and Natural Diamonds,” you will NOT be required to respond to questions pertaining to “Tin, Tungsten, Tantalum, Silver/PGMs, Lab Grown Diamonds, or Colored Gemstones.”

### 2020 SRSP Report Questions

**1.0** Does your company currently or plan to supply jewelry including components, findings, repair services, as well as finished products which include gold, tin, tungsten, tantalum, natural or lab grown diamonds (loose rough or polished, or set in jewelry), silver, platinum group metals (PGMs), or colored gemstones to Signet?

**Please note:** if you are a broker, trader, or auctioneer in natural or lab grown diamonds, you should reply “**YES**” to question **1.0**

**1.01** Does your company supply only loose natural diamonds or lab grown diamonds (polished or rough), or otherwise engage in the supply chain of these products to Signet?

**1.02** Does your company provide jewelry or other materials that do not include gold, 3Ts, silver/PGMs, natural or lab grown diamonds, colored gemstones, or provide a service not including repairs to Signet?

**1.03** If you reported compliance with the Gold, 3Ts, silver / PGMs, and / or diamond SRSP last year, and considering the impact of the COVID-19 pandemic on jewelry industry supply chains, has anything changed in your supply chain since your last SRSP report?

If you are a potential new supplier to Signet and have not previously reported whether you are compliant with the Signet’s Responsible Sourcing Protocol (SRSP), the appropriate response is “Not Applicable - This is our first reporting year.”

If yes,

**1.04** Please explain any changes in your supply chain:

**1.05** Have the changes in your supply chain identified any risks to your company’s compliance with the SRSP?

If Yes;

**1.06** Please explain in detail

**1.07** If you have changes to your supply chain or new suppliers this year, have you verified they are compliant with the requirements of the SRSP?

**If No;**

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

- 1.08 Please explain why and when you expect your suppliers to be compliant with the SRSP in detail.
- 1.09 Signet requires that all suppliers providing Gold, Platinum, Silver, Diamonds and Colored Gemstones be a member of the RJC. Is your company a member of the Responsible Jewellery Council (RJC)?
- 1.10 Does your RJC membership cover supplies of all products supplied to Signet Jewelers?
- 1.11 Are you a Certified Member of the RJC?
- 1.12 If yes, please provide your Certification number: \_\_\_\_\_
- 1.13 Does your RJC Certification include compliance with the SRSP and its appendices for gold, diamonds, silver or colored gemstones SRSP as a “Provenance Claim”?
- 1.14 Do you have management systems, supplier terms of business and a compliance officer in place?
- 1.15 Have you undertaken due diligence in your supply chain of all materials/minerals supplied to Signet?
- 1.16 Have you identified any risks in the Signet supply chain which need reporting to Signet?
- 1.17 **If Yes, please specify:**
- 1.18 Do you have a Know Your Customer/Counterparty (KYC) policy in place?
- 1.19 Are your products “conflict-free” as defined in the Signet Responsible Sourcing Protocol (SRSP)?
- 1.20 Does your supply chain follow guidance in Human Rights as defined in the SRSP?
- 1.21 Does your supply chain follow AML/bribery/facilitation policies as defined in the SRSP?

### GOLD

- 2.0 Does your company currently supply or plan to supply *products of any kind* containing **gold** to Signet Jewelers' business units located in the USA, UK and Canada?
- 2.1 Is your company compliant with the SRSP Appendix for gold?
- 2.2 If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

### 2.3 GOLD SOURCES:

Please select all sources of gold you are using to comply with the SRSP. These sources should apply to your entire supply chain providing gold. Ultimately, you may need to provide documentary evidence (e.g., terms of business, delivery certificates, etc.) to an auditor to support these statements of compliance, and Signet's SRSP compliance project team may request some examples soon after receiving your report as an initial validation. The SRSP Audit Guidance is an aid to assist you in assuring you have clear criteria and documentation in place.

If an audit of your SRSP Compliance Report is required, you will need to supply documentation supporting your claims to the independent 3rd party auditor.

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

**2.3.a.** Gold sourced directly from a refinery, or obtained from a bank or metals trading company where the gold originated from (please select all that apply):

- The LBMA's "good delivery" list
- The DMCC's "good delivery" list
- From a **refinery, bank or metals trading company** otherwise certified as conflict-free (e.g. according to LBMA, RMI, RJC or OECD guidance, SCS Global Services' "Responsible Source" standard and audit, Fairtrade Gold Standard, World Gold Council Conflict-Free Standard or the Chinese Chamber of Commerce of Metals "Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains")
- Not Used

**2.3.b.** Gold sourced from **scrap/recycled, other sources** (please select all that apply):

- Gold sourced directly from **refinery** using verifiable and auditable scrap/recycled sources
- Gold sourced from **scrap/recycled sources** with verifiable and auditable "Know Your Customer / Counterparty" (KYC) practices
- Gold supplied by **other customers, who certify their gold** as conflict-free in accordance with the SRSP
- Grandfathered gold**, which is gold sourced with **verifiable production date prior to 1<sup>st</sup> January 2012**
- Any other miscellaneous source, please specify:
- Not Used

**2.3.c.** Gold sourced directly from a subcontractors or outside manufacturing partners where gold was obtained from a **refinery, bank, or metals trading company** with gold being sourced from (please select all that apply):

- The LBMA's "good delivery" list
- The DMCC's "good delivery" list
- A Source otherwise certified as conflict-free (e.g. according to LBMA, RMI, RJC or OECD guidance, SCS Global Services' "Responsible Source" standard and audit, Fairtrade Gold Standard, World Gold Council Conflict-Free Standard or the Chinese Chamber of Commerce of Metals "Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains")
- Sourced from a refinery using verifiable scrap/recycled sources
- Sourced from scrap/recycled sources with verifiable Know Your Customer/Counterparty ("KYC") practices
- Sourced from a further subcontractor (please specify)
- Not used

### TIN

**3.0** Does your company currently supply or plan to supply products of any kind containing **tin** to Signet Jewelers' business units located in the USA, UK and Canada?

**3.1** Is your company compliant with the SRSP Appendix for Tin?

**3.2** If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

### 3.3 Tin Sources

Please select all your sources of Tin you are using to comply with the SRSPs. Note these sources should apply to your supply chain providing Tin so multiple answers are possible. Ultimately, you may need to provide documentary evidence (e.g., terms of business, delivery certificates, etc.) to an auditor to support these statements and the Signet's SRSP compliance project team may request some examples soon

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

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### 3.3.a. Tin Metal Trading or Smelters (please select all that apply):

- Tin sourced from metals trading company using material certified by smelter as “conflict-free” in accordance with SRSP criteria
- Tin sourced from smelter certified to the Responsible Minerals Initiative (RMI)
- Tin sourced from smelter using verifiable and auditable scrap/recycled sources
- Not Used

### 3.3.b. Tin Scrap/Recycled Source, Subcontractors or Other sources (please select all that apply):

- Tin sourced from scrap/recycled sources with verifiable and auditable “Know Your Customer / Counterparty” practices
- Tin sourced from subcontractor using material certified as conflict-free in accordance with SRSP criteria
- Grandfathered 3Ts" - i.e. 3Ts sourced with verifiable production date prior to 1st January 2012
- Not Used

## TUNGSTEN

**4.0** Does your company currently supply or plan to supply products of any kind containing **tungsten** to Signet Jewelers' business units located in the USA, UK and Canada?

**4.1** Is your company compliant with the SRSP Appendix for Tungsten?

**4.2** If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

### 4.3 Tungsten Sources

Please select all your sources of Tungsten you are using to comply with the SRSPs. Note these sources should apply to your supply chain providing Tungsten so multiple answers are possible. Ultimately, you may need to provide documentary evidence (e.g., terms of business, delivery certificates, etc.) to an auditor to support these statements and the Signet’s SRSP compliance project team may request some examples soon after receiving your report as an initial validation. The SRSP Audit Guidance is an aid to assist you in assuring you have clear criteria and documentation in place.

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### 4.3.a. Tungsten Metal Trading or Smelters (please select all that apply):

- Tungsten sourced from metals trading company using material certified by smelter as “conflict-free” in accordance with SRSP criteria
- Tungsten sourced from smelter certified to the Responsible Minerals Initiative (RMI)
- Tungsten sourced from smelter using verifiable and auditable scrap/recycled sources
- Not Used

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

### 4.3.b. Tungsten Scrap/Recycled, Subcontractors or Other sources (please select all that apply):

- Tungsten sourced from scrap/recycled sources with verifiable and auditable “Know Your Customer / Counterparty” practices
- Tungsten sourced from subcontractor using material certified as conflict-free in accordance with SRSP criteria
- “Grandfathered 3Ts” - i.e. 3Ts sourced with verifiable production date prior to 1st January 2012
- Not Used

## TANTALUM

**5.0** Does your company currently supply or plan to supply products of any kind containing **tantalum** to Signet Jewelers' business units located in the USA, UK and Canada?

**5.1** Is your company compliant with the SRSP Appendix for tantalum?

**5.2** If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

**5.3** Please select all your sources of Tantalum you are using to comply with the SRSPs. Note these sources should apply to your supply chain providing Tantalum so multiple answers are possible. Ultimately, you may need to provide documentary evidence (e.g., terms of business, delivery certificates, etc.) to an auditor to support these statements and the Signet’s SRSP compliance project team may request some examples soon after receiving your report as an initial validation. The SRSP Audit Guidance is an aid to assist you in assuring you have clear criteria and documentation in place.

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### 5.3.a. Tantalum Metal Trading Source, Smelters (please select all that apply):

- Tantalum sourced from metals trading company using material certified by smelter as “conflict-free” in accordance with SRSP criteria
- Tantalum sourced from smelter certified to the Responsible Minerals Initiative (RMI)
- Tantalum sourced from smelter using verifiable and auditable scrap/recycled sources
- Not Used

### 5.3.b. Tantalum Scrap/Recycled, Subcontractors or Other sources (please select all that apply):

- Tantalum sourced from scrap/recycled sources with verifiable and auditable “Know Your Customer / Counterparty” practice
- Tantalum sourced from subcontractor using material certified as conflict-free in accordance with SRSP criteria.
- “Grandfathered 3Ts” - i.e. 3Ts sourced with verifiable production date prior to 1st January 2012
- Not Used

**6.0** Does your company currently supply or plan to supply products of any kind containing **silver and / or platinum group metals (PGMs), which include platinum, ruthenium, rhodium, palladium, osmium, iridium** to Signet Jewelers' business units located in the USA, UK and Canada?

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

**6.1** If **yes**, Is your company compliant with the SRSP Appendix for silver and platinum group metals (PGMs)?

**6.2** If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

### 6.3 Silver and Platinum Group Metal (PGMs) Sources

Please select all your sources of Silver or Platinum Group Metals (PGMs) you are using to comply with the SRSPs. Note these sources should apply to all your supply chain providing Silver or PGMs so multiple answers are possible. Ultimately, you may need to provide documentary evidence (e.g., terms of business, delivery certificates, etc.) to an auditor to support these statements and the Signet's SRSP compliance project team may request some examples soon after receiving your report as an initial validation. The SRSP Audit Guidance is an aid to assist you in assuring you have clear criteria and documentation in place.

**If an audit of your SRSP Compliance Report is required, you will need to supply documentation supporting your claims to the independent 3rd party auditor.**

**6.3.a.** Silver and/or PGMs sourced directly from a refinery, or obtained from a bank or metals trading companies/alloy/solder/plating solutions suppliers where the metals/alloy/solder/plating solutions originate from: (please select all that apply)

- The LBMA “good delivery” lists
- Silver and/or PGMs sourced directly from refinery otherwise certified as conflict-free (e.g. according to LBMA, RJC or OECD guidance, SCS Global Services’ “Responsible Source” standard and audit, MKS PAMP Responsible Metals Guidance)
- Silver and/or PGMs sourced directly using verifiable and auditable scrap/recycled sources with public Know Your Counterparty (“KYC”) procedures
- Not Used

**6.3.b.** Silver and/or PGMs sourced from **Scrap/Recycled Sources**: (please select all that apply)

- Silver and/or PGMs sourced from scrap/recycle sources with public verifiable and auditable “Know Your Customer / Counterparty” (KYC) practices
- Not Used

**6.3.c.** Silver and/or PGMs sourced directly from a subcontractors or outside manufacturing partners where silver / PGMs were obtained from a refinery, bank, or metals trading company with silver being sourced from (please select all that apply):

- Silver and/or PGMs sourced using silver and/or PGMs from LBMA or LPPM “good delivery” refinery lists
- Silver and/or PGMs sourced using silver and/or PGMs otherwise certified as conflict-free (e.g. according to LBMA, OECD, RJC guidance, SCS Global Services’ “Responsible Source” standard and audit, MKS PAMP Responsible Metals Guidance)
- Silver and/or PGMs sourced using verifiable and auditable scrap/recycled sources with public Know Your Counterparty (“KYC”) procedures
- Not Used

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

### Natural Diamonds

**7.0** Does your company currently supply or plan to supply products of any kind containing natural diamonds (loose, rough or polished, or set in any type of jewelry or watch product) to Signet Jewelers' business units located in the USA, UK and Canada?

If Yes:

**7.01** Please select the type of **natural diamonds** you supply Signet (**select all that apply**):

- Natural Loose Polished diamonds
- Natural Loose Rough diamonds
- Natural Diamond jewelry (made with Gold)
- Natural Diamond jewelry (made with any of the 3Ts)
- Natural Diamond jewelry (made with Silver and/or PGMs)
- Natural Diamond jewelry (Not made with Gold, 3Ts, Silver and/or PGMs)

**7.02** Is your company compliant with the SRSP Appendix for Diamonds?

**7.03** If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

**7.04 Natural Diamond Categories** - Please select which category or categories of natural diamonds your company supplies to Signet. (**Please select all that apply**)

- Category 1 (Single Stone Tracking)?** Individual natural diamonds supplied by or sourced from identified diamond producers which are independently certified under separate, relevant international standards (such as the RJC Code of Practices). All natural diamonds sourced in this category should be identifiable from the producer/mining company.
- Category 2 (Parcel Tracking)?** Parcels of natural diamonds supplied by or sourced from identified diamond producers which are independently certified under separate, relevant international standards (such as the RJC Code of Practices). All parcels of natural diamonds sourced in this category should be identifiable as coming from the producers/mining companies.
- Category 3 (Mixed Sources)?** Natural Diamonds are derived from a number of sources, with some percentage of the natural diamonds deriving from a known, identified and verified source.
- Category 4 (Other Identified & Verified Sources)?** Natural Diamonds deriving from small-scale or artisanal producers. All natural diamonds sourced in this category should be identifiable from the artisanal producers.

**7.05** For your **Category 3 natural diamonds**, what percentage are derived from identified sources?

**7.06** For the natural diamonds your company supplies to Signet, what supporting documentation do you have to verify your claim (**select all that apply**):

**If an audit of your SRSP Compliance Report is required, you will need to supply documentation supporting your claims to the independent 3rd party auditor.**

- Inventory records, sale or purchase documents for rough and or polished natural diamonds indicating the mine or mines from which the natural diamonds derived (Producers)

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

- Inventory records, sale or purchase documents from verified natural diamond producer
- Terms of business with verified natural diamond producer
- KPCS (Kimberley Process Certification Scheme) Certificates
- KYC (Know Your Customer/Counterparty) policy and records
- De Beers BPP certification
- For retail returns, recycled natural diamonds and other used sources, records must be maintained which state the source
- Other (please specify and give an example)

**7.07** Are you following the requirements of the SRSP, Natural Diamond appendix to establish the processes and procedures to detect lab-grown diamonds?

**7.08** If no, Please describe the steps you will take to comply with the Signet SRSP natural diamond appendix to identify lab-grown diamonds in your supply chain.

**7.09** Do your processes use technology (testing machines) to identify lab-grown diamonds?

**7.09.a** Please select the testing machines you are currently using:

- DTC AMS2
- DTC Diamond Sure
- DTC Diamond View
- DTC SynthDetect
- GII Q Check ++
- DRC Techno D Secure+
- HRD M Screen
- OGI Systems Dia-True
- Guangzhou Biaoqi GLIS 3000
- GIA ID100
- GIA Diamond Check
- Yehuda Sherlock Holmes
- Presidium Diamond Tester
- Nanjing Gem Instrument/NGTC GV5000
- Gemologis Leo
- Other (Please specify):

**7.10** Do your processes use laboratory testing services to identify lab-grown diamonds?

**7.10.a.** Please select the testing laboratories you are currently using:

1. GIA
2. GII
3. IGI
4. AGS
5. IIDGR
6. HRD
7. Other (Please specify):

**7.11** Are you compliant with the Intellectual Property requirements in the Signet Responsible Sourcing Protocol (SRSP), Natural Diamond Appendix?

**7.12** Do you have machines, equipment, tools, software or technology at your facilities that are used to internally scan and map inclusions in rough natural diamonds before cutting?



## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

7.13 If Yes, please state the manufacturer name and product names.

7.14 Do you outsource the internal scanning and inclusion mapping of rough diamonds to an external provider?

7.15 If yes, please name the external provider(s):

### Lab Grown Diamonds

8.0 Does your company currently supply or plan to supply products of any kind containing **lab grown diamonds (loose, rough or polished, or set in any type of jewelry or watch product)** to Signet Jewelers' business units located in the USA, UK and Canada?

8.01 Please select the type of **lab grown** diamonds you supply Signet (**select all that apply**):

- Loose Polished lab grown diamonds
- Loose Rough lab grown diamonds
- Lab Grown Diamond jewelry (made with Gold)
- Lab Grown Diamond jewelry (made with any of the 3Ts)
- Lab Grown Diamond jewelry (made with Silver and/or PGMs)
- Lab Grown Diamond jewelry (Not made with Gold, 3Ts, Silver and/or PGMs)

8.02 Is your company compliant with the SRSP Appendix for Lab Grown Diamonds, its requirements for factory health and safety, working conditions, testing and disclosure requirements?

8.03 If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

8.04 Are you following the testing requirements of the SRSP for Lab Grown Diamond appendix, as specified under section 4.0, to ensure all stones are in fact LGDs and that parcels do not contain natural diamond, diamond simulants and/or any material which is not laboratory-grown diamond?

**If No:**

8.05 Please explain what steps you will take to comply with the testing requirements of the SRSP for Lab Grown Diamonds:

8.06 Please note, an additional warranty statement is required for all LGD suppliers, in addition to the SRSP and diamond warranty statements. Are you aware of the additional new LGD warranty statement requirement?

### Colored Gemstones

9.0 Does your company currently supply or plan to supply products of any kind containing **Colored Gemstones (natural emerald, ruby, and / or sapphire)** to Signet Jewelers' business units located in the USA, UK and Canada?

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

**9.01** Please select the type of **natural** colored gemstones you supply Signet (**select all that apply**):

- Natural Emerald
- Natural Ruby
- Natural Sapphire
- Other Natural Colored Gemstones (Please list)

**9.02** Is your company compliant with the SRSP Appendix for Colored Gemstones?

**9.03** If you select **not compliant**, you should explain why and when you expect to be compliant and what action is required to do so.

**9.04** Are you following the requirements of the SRSP for Colored Gemstones appendix to detect treatments and undertake testing to ensure all colored gemstones provided to Signet are natural?

**If No:**

**9.05** Please explain below what steps you will take to comply with the testing requirements of the SRSP for Colored Gemstones:

**9.06 Colored Gemstone Categories** - Please select which category or categories of natural colored gemstones your company supplies to Signet. (**Please select all that apply**)

- Category 1 (Single Stone Tracking or Parcel Tracking)?** Individual gemstones or parcels of gemstones supplied by or sourced from “identified and verified sources” as defined in 5.3. Recycled gemstones should be included here.
- Category 2 (Mixed Sources)?** This category allows for the mixing of gemstones deriving from a number of different or unidentified sources, with some percentage of the gemstones deriving from original sources.

### OTHER ITEMS

**10.0** Does your company provide jewelry in materials **other than** (gold, tin, tungsten, tantalum, silver, platinum group metals (PGMs), natural or lab grown diamonds, colored gemstones (natural emerald, ruby, and / or sapphire) **to Signet?**

**10.1** Please select all that apply:

- Base metals, costume fashion jewelry (which do not include gold, 3Ts, Silver or PGMs)
- Colored gemstones (other than **natural emerald, ruby, and / or sapphire**)
- Jewelry (Not made with Gold, 3Ts, Silver, PGMs or set with natural or lab grown diamonds or natural colored gemstones)
- Pearls or jewelry made with pearls
- Piercing products
- Stainless Steel
- Watches
- Other (Please describe)

**11.0** If you would like to make any comments or grievances to Signet, please write them below:

## 2020 Signet Responsible Sourcing Protocol (SRSP) Compliance Report

11.1 If you think Signet needs to be aware of any risks or concerns which you can identify in your or in others' supply chains, please include them below:

### WARRANTY STATEMENT

12.0 The following warranty statements are required on ALL invoices, even on invoices that do not contain Gold, any of the 3Ts, Natural or Lab Grown Diamonds, Silver / PGMs, Colored Gemstones or Other Metals:

*The seller warrants that these products have been supplied in compliance with the Signet Responsible Sourcing Protocol ("SRSP").*

*Any natural diamonds herein supplied have been purchased from legitimate sources not involved in funding conflict and in compliance with United Nations Resolutions and corresponding national laws. The seller hereby guarantees that these natural diamonds are conflict-free and confirms adherence to the WDC SOW Guidelines*

**(For LGD only)** *Any laboratory-grown diamonds herein supplied comply with the SRSP and are warranted not to include any natural diamonds or any material which is not laboratory-grown diamond.*

Signet will allow suppliers to use the previous warranty statements for a transition period. Suppliers should try to use the new warranty statements as soon as possible. The new warranty statement will be a mandatory requirement by September 30, 2020.

**Do you plan to immediately include the SRSP warranty statements on all your documentation?**

### ATTESTATION

13.0 Do you attest that the information and answers provided in this report are true to the best of your understanding?

13.1 Do you have any further comments, additional information pertaining to these questions, or want to request further information?