



Signet Statement Regarding Dodd-Frank Section 1502

Signet Jewelers (“Signet”) is the largest specialty jewelry retailer in the USA, Canada and the United Kingdom.

Signet believes that a responsible, conflict-free supply chain is fundamental to the reputation of the jewelry industry. Signet is, therefore, committed to continuing our longstanding efforts to advance responsible sourcing throughout the global jewelry industry supply chain.

To this end, Signet is a member of the OECD Multi-Stakeholder group responsible for the drafting and implementation of the OECD’s Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Signet is also a Founding and Certified Member of the Responsible Jewellery Council, the global standards and certification organization for responsible practices in the jewelry industry supply chain from mine to retail.

When Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”) was enacted, Signet publicly supported the spirit of the legislation and, during the comment period, worked actively with the SEC to provide constructive input that sought to balance the objectives of the legislation with practical considerations applicable to the jewelry industry.

For the last 3 years, Signet has filed a Form SD and an accompanying, independently audited Conflict Minerals Report (CMR) stating that Signet has determined that its jewelry and gift products containing gold, tin, tungsten, or tantalum (“3TG”) are “DRC conflict-free.” Signet’s CMR states that through the exercise of due diligence, Signet has identified sources of 3TG in its supply chain which originated, or may have originated, in the Democratic Republic of the Congo and neighboring countries, and has determined that all of these sources qualify as DRC conflict-free for purposes of Section 1502 of the Dodd-Frank Act, the SEC’s rules thereunder and internationally recognized industry guidance and standards. While working on our own compliance, we have also actively shared our processes and protocols with others in our own industry and beyond.

Signet believes that Section 1502 has been a global driving force in the supply chains of 3TG to establish and maintain responsible, conflict-free supply chains. Signet acknowledges that Section 1502 has had some unintended consequences leading some industry participants to avoid minerals from the DRC and neighboring countries. However, Signet believes that this can be corrected by amending Section 1502 to align with the OECD’s Due Diligence Guidance, whereby US companies are required to undertake and report on due diligence in their supply chains in accordance with the OECD Guidance. Thus, supplies from these “covered countries” can be sourced providing they are verified and certified as “conflict-free.”

Irrespective of the outcome of the debate on the future of the legislation, Signet’s maintains its dedication to responsible sourcing. We will continue to strive to provide industry leadership and encourage continuous improvement in the global jewelry supply chain.

For further information on Signet’s policies on responsible sourcing and other corporate initiatives, please visit www.signetjewelers.com/corporate-responsibility.

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