

UNITED NATIONS GLOBAL COMPACT: COMMUNICATION ON PROGRESS 2019

In 2011, Tiffany & Co. joined the United Nations Global Compact (UNGC), a strategic policy initiative for businesses committed to aligning their operations and strategies with 10 principles in the areas of human rights, labor standards, environment and anti-corruption. The table below shows how we are communicating on progress for the Ten Principles.

PRINCIPLE	GLOBAL COMPACT PRINCIPLES	COMMUNICATION ON PROGRESS
HUMAN RIGHTS		
1	Businesses should support and respect the protection of internationally proclaimed human rights.	Tiffany & Co. adheres to key policies and procedures in order to help safeguard human rights within the Company and throughout our supply chain. For information on our policies, please see the GRI Index and page 2 of this document for links to our key policies. Within the Company, we prioritize diversity and inclusion by welcoming the unique identities, expressions, ideas, abilities and cultures from our employees around the world. The Company’s Social & Environmental Accountability Program evaluates suppliers to better protect human rights in our supply chain. Beyond these spheres of influence, Tiffany & Co. is committed to protecting human rights throughout the industry and seeks to advance high standards in responsible mining and advocating for the protection of human rights. For more information, please see Tiffany.com/Sustainability , the “Tiffany & Co. Supplier Code of Conduct” and “Tiffany & Co. Supplier Code of Conduct Guidance.”
2	Businesses should make sure they are not complicit in human rights abuses.	
LABOR STANDARDS		
3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	Tiffany & Co. recognizes and respects the importance of labor standards to protect workers worldwide. Tiffany & Co. provides guidance to employees and the Human Resource function of its organization to enhance compliance with applicable employment laws and regulations to foster a positive and ethical work environment. For more information, please see the GRI Index, Tiffany.com/Sustainability , and page 2 of this document for links to our key policies.
4	Businesses should uphold the elimination of all forms of forced and compulsory labor.	Through its Social & Environmental Accountability Program, Tiffany & Co. upholds standards in social and environmental responsibility by working with a key subset of suppliers to help them improve their human rights, labor and environmental performance. Suppliers are expected to adhere to the Tiffany & Co. Supplier Code of Conduct, which addresses freedom of association and collective bargaining, forced labor, child labor, harassment or abuse, disciplinary practices and discrimination, among other practices. Additionally, Tiffany & Co. supports the strengthening of industry-wide labor standards beyond our immediate operations. For more information, please see Tiffany.com/Sustainability and the “Tiffany & Co. Supplier Code of Conduct” and “Tiffany & Co. Supplier Code of Conduct Guidance.”
5	Businesses should uphold the effective abolition of child labor.	
6	Businesses should uphold the elimination of discrimination in respect of employment and occupation.	

PRINCIPLE	GLOBAL COMPACT PRINCIPLES	COMMUNICATION ON PROGRESS
ENVIRONMENT		
7	Businesses should support a precautionary approach to environmental challenges.	Tiffany & Co. draws on the natural world for both design inspiration and the precious materials used in our products. At the Company's core is a commitment to preserve, protect and responsibly manage the environment on which we rely for our long-term success. The Company promotes environmental responsibility by leveraging the Tiffany brand. For example, the Company has set a goal of reaching net-zero greenhouse gas emissions and advocates for policies around the world to help tackle the climate crisis. The Company also actively participates in industry-wide collaborative efforts to protect against environmental damage across the supply chain, raises awareness of risks associated with mining in ecologically sensitive areas and directly sources raw metals principally from mines we know and recycled sources. These efforts are strengthened by the Foundation's support of scientific research, conservation and multi-stakeholder collaboration to promote environmentally responsible standards in mining operations. In addition to addressing the impacts of mining, we regularly look to reduce our environmental footprint in other ways—from using recycled and FSC®-certified paper to reducing our greenhouse gas emissions. For more information, please see Tiffany.com/Sustainability .
8	Businesses should undertake initiatives to promote greater environmental responsibility.	
9	Businesses should encourage the development and diffusion of environmentally friendly technologies.	
ANTI-CORRUPTION		
10	Businesses should work against corruption in all its forms, including extortion and bribery.	The <i>Tiffany & Co. Business Conduct Policy</i> sets forth expectations for Tiffany & Co. employees, including compliance with relevant laws and regulations. This policy prohibits payment of bribes and the acceptance of inappropriate payments or gifts. All employees are required to review the policy upon hire and thereafter on an annual basis to make sure that they understand these standards. Certain employees in all regions, including regional management, are required to undergo Anti-Money Laundering training. In addition, employees whose responsibilities may involve interactions with government officials are required to annually undergo Anti-Bribery & Corruption training. Within our supply chain, the Tiffany & Co. Supplier Code of Conduct outlines expectations for ethical conduct and legal compliance. For more information, please see Tiffany.com/Sustainability , the GRI index, "Tiffany & Co. Supplier Code of Conduct," "Tiffany & Co. Supplier Code of Conduct Guidance" and the <i>Tiffany & Co. Business Conduct Policy</i> .

HOW WE SUPPORT THE UN GLOBAL GOALS

Tiffany & Co. reports on its contributions to many of the 17 United Nations Global Goals, also referred to as the Sustainable Development Goals (SDGs). Our business aligns most closely with the five goals described below. We hope to drive progress on this shared global agenda through our work and collaboration from within our industry, and with other businesses, civil society and government.



GENDER EQUALITY

DIVERSITY OF OUR WORKFORCE

We work to promote a culture of excellence and diversity in the workplace and are proud that

62%



of manager and above roles are held by women.

SENIOR MANAGEMENT GENDER RATIO

In 2019,

50%^o

of Tiffany & Co. Senior Management were women.

TRAINING & DEVELOPMENT

Our manufacturing facilities in developing countries employ a predominantly female workforce, and we provide good jobs with the opportunity to earn a living wage—as well as opportunities for training and development—to all regular, full-time diamond polishers and jewelry manufacturers.

WOMEN'S EMPOWERMENT

In 2017, we affirmed our commitment to women's rights, human rights, and diversity and inclusion by signing the United Nations Women's Empowerment Principles.

SUPPORTING PARENTS & CAREGIVERS

In 2018, we expanded our global leave policy designed to give employees greater flexibility through enhanced parental leave and paid time off to care for ill family members. This policy supports gender equality at home and promotes work-life balance.



EMPLOYEE RESOURCE GROUPS

Today, we have four Employee Resource Groups—Multicultural, Women, LGBTQIA+ and Life Stages—across 12 global chapters. These groups advance our goals around creating positive community impact, building an inclusive culture, expanding our learning and development and diversifying our talent sourcing.



RESPONSIBLE CONSUMPTION AND PRODUCTION

INTEGRITY

Our vertical integration model for sourcing materials and crafting jewelry helps us incorporate environmental and social integrity across the supply chain.



SOCIAL & ENVIRONMENTAL STANDARDS

We strive to maintain high social and environmental standards in our operations and supply chain to complement the exceptional quality and craftsmanship of our products.

TRANSPARENCY IN DIAMOND SOURCING

In 2019, we launched the Diamond Source Initiative, pledging to provide provenance information—region or countries of origin—for every newly sourced, individually registered diamond we set—a significant step for diamond transparency.

IRMA STANDARD FOR RESPONSIBLE MINING

Tiffany & Co. is proud to be a founding member of the Initiative for Responsible Mining Assurance (IRMA). IRMA released the pioneering Standard for Responsible Mining, the result of a decade-long multi-stakeholder collaboration, which defines for the first time what constitutes social and environmental responsibility in large-scale mining.

PRESERVING RESOURCES

We carefully source our products and materials—from precious metals and diamonds to paper and packaging—in an effort to uphold principles of social and environmental responsibility and preserve nature's resources.

ADVOCACY

We use our voice in an effort to improve standards for the mining industry and advocate for the protection of human rights and Earth's precious natural resources.

^o See our April 20, 2020 Proxy Statement.

HOW WE SUPPORT THE UN GLOBAL GOALS (CONTINUED)



CLIMATE ACTION

NET-ZERO EMISSIONS

We are committed to achieving net-zero greenhouse gas emissions.

ENERGY EFFICIENCY

In the short term, we are taking concrete steps to improve energy efficiency, reduce energy use and follow sustainable building design principles. As of June 2020, 16 of our new and renovated retail stores in our Asia-Pacific region received LEED (Leadership in Energy and Environmental Design) Silver or Gold certification.

ADVOCACY

We are active in the movement to combat climate change and use our voice to advocate for responsible climate policy and the importance of protecting biodiversity.

RENEWABLE ELECTRICITY

We aim to ultimately use 100% renewable energy globally.

In 2019,

84%

of our global electricity came from clean, renewable sources.

CARBON OFFSETS

For the past three years, we invested in carbon offsets from a locally run forest conservation project that also delivers social and economic benefits to communities in Kenya's Chyulu Hills.



LIFE BELOW WATER

MARINE CONSERVATION

Tiffany & Co. stopped using coral over a decade ago, and The Tiffany & Co. Foundation has awarded over

\$25 million

in grants for coral and marine conservation.



CREATING PROTECTED AREAS

The Foundation supports the creation and expansion of marine protected areas around the world through organizations such as Oceans 5, the Wildlife Conservation Society and Conservation International.



RESEARCH & INNOVATION

The Foundation has supported innovative research and restoration techniques to increase the long-term resilience of coral in places from the Caribbean to the Great Barrier Reef.



LIFE ON LAND

LAND PRESERVATION

We consider it our responsibility to help preserve the natural beauty that inspires so many of our jewelry designs. We advocate for the protection of special places from mining. For example, in 2019, our Chief Sustainability Officer reiterated our opposition to the proposed Pebble Mine in Bristol Bay, Alaska in testimony before the U.S. Congress. She also outlined why Tiffany & Co. believes it is important that rigorous environmental review of any mining projects occur, with proper consultation of local stakeholders, especially with respect to projects that threaten to disrupt pristine landscapes such as Bristol Bay.

SOURCING RAW MATERIALS

We are thoughtful about which raw materials we use—and which we don't—and we carefully consider how these materials are procured and crafted.

PROTECTING WILDLIFE

We advocate against the use of endangered species in jewelry and support conservation efforts to protect wildlife. To date, in partnership with our customers, we have raised more than USD \$8 million for the Wildlife Conservation Network through the Tiffany Save the Wild collection to help protect elephants, rhinos and lions.

REVERSING DEFORESTATION

To do our part in reversing global forest loss, Tiffany & Co. seeks to remove commodity-driven deforestation from our key supply chains by the end of our 2020 fiscal year.



Women's Empowerment Principles

We have advanced our long-standing commitment to women at work through our culture, policies and programs at Tiffany. In 2017, we reinforced our commitment to women's rights, human rights and diversity and inclusion by signing on to the UN's Women's Empowerment Principles. Through supporting non-discrimination, promoting professional development for women and publicly reporting on progress to achieve gender equality, signatories of the Women's Empowerment Principles commit to prioritizing women in the workplace. Guided by these principles, Tiffany & Co. is committed to fostering gender equality, endeavoring to treat all women and men fairly at work and to support their health, safety and well-being. In recognition of Women's History Month in March 2020, we celebrated the unique contributions of Tiffany women through an employee-featured brand initiative.



Diversity and Inclusion

Our mission for Diversity & Inclusion is to fully leverage the power of our people to make Tiffany & Co. the most inclusive luxury brand. We define diversity as the unique identities, expressions, ideas, abilities and cultures of all our people—from our more than 14,000 employees to our cherished consumers and the communities where we live and operate. We believe the combined power of all these perspectives enables our company to grow and succeed.

We build our efforts around three strategic pillars with clear objectives:

Talent: Expand our diverse workforce and build competencies to deliver for our business, customers and communities.

Culture: Build an inclusive workplace where employees feel all aspects of themselves are valued and leaders demonstrate and model inclusive behaviors.

Brand: Become the most inclusive luxury brand by implementing successful diversity and inclusion practices that grow our business.

In 2019, we achieved a number of successes in advancing our diversity and inclusion goals, including the global launch of our unconscious bias training for all employees, the creation of Employee Resource Groups to build space for inclusion and belonging across our global workforce, and our ongoing efforts to speak out publicly in support of diversity and equality around the world.

[Learn More >](#)

Championing Women

Tiffany & Co. is proud to champion women as customers, employees and leaders in our Company. We focus on the representation of women throughout our Company and embed respect for gender equality through our policies and commitments. We believe our ongoing efforts help ensure equal opportunities for all of our employees to reach their full potential in the workplace.

[Learn More >](#)





Championing Women

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Learn More >

** See the Report of Independent Accountants*

*** See our April 20, 2020 Proxy Statement*

Promoting Growth and Development

We believe that by helping our employees grow as professionals, we grow as a company. We support career development and growth through a number of programs, including TiffanyU, Grow with Tiffany, the Tiffany Academy for Excellence and Diversity in Retail Leadership and our performance management process.

In 2020, we created TiffanyU, a modern approach to learning and development for all Tiffany employees. This global platform provides access to on-demand learning, leadership and management development programs, including live and virtual programs, peer-to-peer social learning and more than 15,000 courses in seven languages. We believe that giving all of our employees access to these capability-building tools will strengthen our Company and help us continue our growth and success.

We launched our Grow with Tiffany career-development program in 2017 to make a variety of resources available to employees at all levels, including career-mapping exercises and discussion guides. We launched the Tiffany Academy in 2015 to develop diverse, high-potential professionals and provide them with the chance to experience different business roles and build rewarding careers. Combined with the training programs we have developed for workers in our global manufacturing facilities, these career development programs aim to help our employees achieve their career aspirations and our business objectives.

We created our performance management process to provide a structured approach to employee evaluation and to identify opportunities for our employees to excel in their careers. This process utilizes tools that aim to help employees and managers identify strengths and areas for growth, while attempting to mitigate unconscious bias that can affect performance assessments. As part of our efforts to embed sustainability throughout our business, in 2020 we added a sustainability focus to our annual goal-setting and performance management process for all managers and above, aligning their work with support for Tiffany's sustainability goals.

[Learn More >](#)



Attracting and Promoting Diverse Talent

Through our Talent pillar, we aim to expand our diverse workforce and build competencies to deliver for our business, customers and communities. A key element is to analyze and evolve our talent systems and processes so they provide us the diverse perspectives we need to succeed and innovate. In 2019, we continued to embed diversity and inclusion into our learning and development programs, including the global launch of our unconscious bias training for all employees.

Tiffany Academy

Since 2015, the Tiffany Academy for Excellence and Diversity in Retail Leadership has offered high-potential early- to mid-career professionals the opportunity to build rewarding careers. We designed this program to help elevate our hiring and training initiatives. Each year, we convene a diverse class of aspiring retail leaders and provide them with leadership development training, mentoring and the opportunity to participate in projects with diverse perspectives.

[Learn More >](#)



Culture

Our Culture pillar is focused on building an inclusive workplace where employees feel all aspects of themselves are valued, and leaders demonstrate and model inclusive behaviors.

In our efforts to build an inclusive workplace, we have focused on creating safe spaces and opportunities for meaningful and open conversations amongst our employees. We also continue to analyze our benefits and policies and evolve them to meet the fast-changing needs of our workforce around the world.

Employee Resource Groups

In 2019, Tiffany & Co. launched Employee Resource Groups, voluntary employee-led groups formed around aligned interests that provide employees the opportunity to engage more deeply, learn from one another and openly share ideas to influence our business.

Today, we have four Employee Resource Groups—Multicultural, Women, LGBTQIA+ and Life Stages. These groups advance our goals around creating positive community impact, building an inclusive culture, expanding our learning and development and diversifying our talent sourcing.



Inclusive Policies

We strive to create workforce policies and practices that respond to our employees' unique needs.

Our Parental and Caregiver Leave policy is designed to give all employees greater flexibility. [The policy includes a minimum of 14 weeks of paid leave for birth parents and eight weeks of paid leave for non-birth parents.] The Company also provides two weeks of paid leave per year for employees to care for ill family members, as well as a flexible workplace policy to accommodate greater work-life balance.



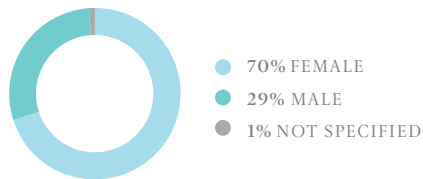


Tiffany Infinite Strength

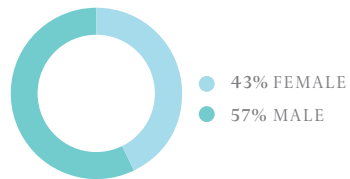
From July 1 through August 31, 2020, 100% of profits from the Tiffany Infinite Strength campaign will be donated to a leading international humanitarian organization, CARE. We will make a minimum donation of USD \$2M to CARE to support its efforts to help vulnerable communities affected by COVID-19, particularly women and people of color, to recover and become more financially resilient. Shop to join Tiffany and show you care by spreading a message of strength and optimism.

GENDER DIVERSITY BY MANAGEMENT LEVEL

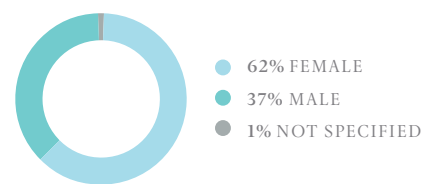
GLOBAL WORKFORCE[◇]



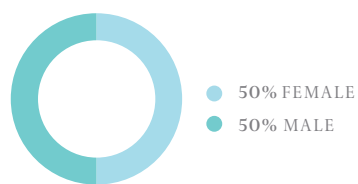
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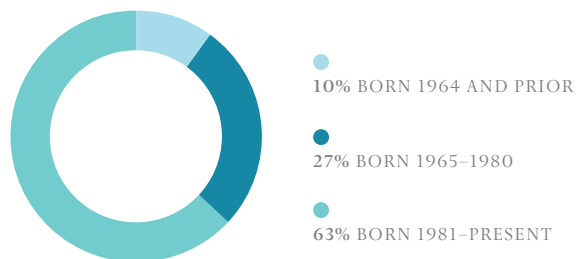
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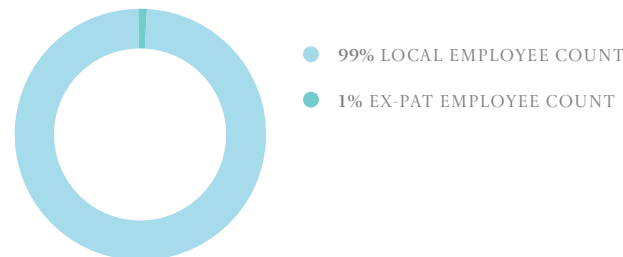


EMPLOYEE DIVERSITY BY GENERATION^{◇*}



LAURELTON LOCAL WORKFORCE^{*}

International manufacturing locations include Vietnam, Cambodia, Botswana, Mauritius, Dominican Republic, Antwerp and Thailand.



[◇] As self-disclosed by employees

^{*} See the Report of Independent Accountants

[◇] See our April 20, 2020 Proxy Statement.

Percentage rough diamonds traceable to the mine or source	The weight in carats, expressed as a percentage, of rough diamonds received by Tiffany & Co. which were purchased directly from a supplier that sources from one mine or from a supplier that sources from multiple known mines, but is not traceable to a specific mine, during the period January 1, 2019 to December 31, 2019 via Laurelton Diamonds in Botswana, and February 1, 2019 to January 31, 2020 via Laurelton Diamonds in Belgium, as indicated by either (1) the contractual terms with the supplier, which require the diamonds to be purchased from a specific mine(s), or if unavailable (2) the details listed on the invoice received, or if unavailable (3) information available on the specific supplier's website with respect to mining location in the purchasing year.	100%
Economic beneficiation – Botswana	The U.S. dollar equivalent of beneficiation paid during the period January 1, 2019 to December 31, 2019 by Tiffany & Co. in Botswana (a diamond-producing country whose government requires beneficiation). This amount includes payments to domestic suppliers for rough diamonds, local partner fees, materials and services, taxes, community donations, training and development, income taxes and payroll and benefit costs related to the Laurelton Diamonds facility and local employees.	\$59,311,477
Generation diversity	The diversity of the global workforce, including temporary and seasonal employees, according to date of birth as self-reported and recorded in the Company's Human Resources systems as of January 31, 2020.	Born 1964 and Prior – 10% Born 1965-1980 – 27% Born 1981-Present – 63% No Birthdate Listed – 0%
Gender diversity by management level	The diversity of the global workforce, including temporary and seasonal employees, according to the gender as self-reported and recorded, and management level as recorded in the Company's Human Resources systems, as of January 31, 2020. The Board of Directors is separately tracked and presented as of January 31, 2020.	<u>Global Workforce</u> Female – 70% Male – 29% Not Specified – 1% <u>Manager and Above</u> Female – 62% Male – 37% Not Specified – 1% <u>Vice President and Above</u> Female – 43% Male – 57% <u>Board of Directors</u> Female – 50% Male – 50%

TIFFANY & Co.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT

At Tiffany & Co., we pride ourselves on honesty, integrity and excellence. We hold our Suppliers to the same high standards to which we hold ourselves. Our 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*, and work conscientiously to operate within these frameworks.

This Code of Conduct sets out general principles and requirements applicable to all Tiffany Suppliers. Additional descriptions regarding these requirements for manufacturing and supply chain partners can be found in the [Tiffany Supplier Code Guidance](#).

REQUIREMENTS FOR ALL SUPPLIERS

Legal Compliance

Suppliers shall comply with and have a process to identify, monitor and understand all applicable laws, rules and regulations, including those concerning labor, health and safety, human rights, environmental protection and corruption and bribery. In the event this Code of Conduct differs or conflicts with local law, the higher standard shall prevail.

Business Integrity

The highest standards of integrity must be upheld in all business interactions. Suppliers shall conduct business ethically and all business dealings must be transparent and accurately reflected on their business books and records. Suppliers shall have a policy mandating business integrity.

Anti-Corruption and Bribery and Financial Offenses

Suppliers shall not engage in any form of corrupt practices, including bribery, extortion, embezzlement, fraud, money laundering or any business related to terrorist or armed activity. Suppliers shall not violate or cause Tiffany to violate the United States Foreign Corrupt Practices Act or any other applicable anti-corruption or bribery laws. Monitoring and enforcement procedures shall be implemented to ensure compliance with applicable anti-corruption and bribery laws.

Voluntary Employment

All workers shall be free to leave their employment without threat or coercion. 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. Suppliers shall monitor relationships with recruitment agencies or contracted labor for risk of human trafficking and compliance with applicable anti-slavery laws.

TIFFANY & CO. SUPPLIER CODE OF CONDUCT

Child Labor

Suppliers shall not employ any persons under the age of 15, the age for completing compulsory education, the legal minimum age for employment in the country, or the minimum age permitted under ILO conventions, whichever standard is greatest.

Juvenile Workers

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.

Working Hours

Suppliers shall comply with local laws and seek to align with ILO conventions intended to ensure employees do not work excessive hours per week. At a minimum, both regular and overtime hours must be taken into account, and all employees must be allowed one day off in seven. Suppliers shall keep accurate and transparent records of working hours at all times.

Wages and Benefits

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. At a minimum, Suppliers shall comply with applicable law in the payment of wages and overtime pay and the provision of benefits, including holidays, leaves and statutory severance. Suppliers shall provide wage statements to employees for each pay period. Employees must be compensated for overtime hours at the rate legally required by local law or, where such laws do not exist, overtime should be at least 125% of the regular hourly compensation rate in accordance with ILO conventions.

Fair and Equal Treatment

Suppliers shall not use corporal punishment, threats of violence or other forms of mental or physical coercion. Sexual harassment of workers shall not be tolerated. There will be no discrimination in any part of the employment relationship on the grounds of race, religion or belief, political opinion, membership in worker organizations, age, national origin, sexual orientation, gender, marital status, parental status, disability, social group or ethnic origin, veteran's status or any other basis specified by law.

Freedom of Association

Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining. Where laws prohibit these freedoms, Suppliers shall allow the development of parallel means for independent and free association and bargaining.

Grievance Mechanisms and Remedy

Suppliers shall maintain grievance mechanisms to respond to concerns and complaints that ensure effective, timely, respectful and transparent communication among workers, their representatives, management and the community.

Health and Safety

Suppliers shall provide a safe and healthy work environment and fully comply with all applicable safety laws, regulations and industry standards. Suppliers shall regularly assess the workplace for hazards and implement appropriate programs and engineering controls to minimize the risks of work-related accidents. Suppliers will strive to continually improve the effectiveness of their health and safety programs and seek to implement best practices in their industries.

Supplier Code of Conduct

TIFFANY & CO. SUPPLIER CODE OF CONDUCT

Environment

Suppliers shall meet or exceed all environmental laws and regulations, and strive to meet or exceed the standards of international environmental treaties and best practices in their industries. Suppliers shall identify environmental risks and impacts, as well as opportunities for improving environmental performance. Suppliers shall implement and regularly review controls to mitigate identified environmental risks and minimize environmental impacts, including resource use, discharges, emissions and waste disposal, and take a proactive approach to monitoring and collecting data on these topics. Supplier operations and sourcing practices should strive to place special emphasis on the mitigation of climate change and the preservation and rehabilitation of biodiversity and ecosystems.

Host Communities

Suppliers are encouraged to proactively engage with and support development in the communities where their operations and supply chains are located, and to employ, procure and build within those communities.

Security

Suppliers shall ensure the safety and security of all workers and visitors. Suppliers shall assess security risks and establish measures to prevent product or intellectual property theft, unauthorized access to or loss of employee or customer personal information, and 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 its 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.

Traceability and Due Diligence

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.

APPLICATION AND COMPLIANCE

Suppliers are responsible for ensuring that this Code of Conduct is understood and followed throughout their operations. Accordingly, Suppliers must share this Code of Conduct with all workers in their local language. Suppliers are also responsible for ensuring that any approved subcontractors involved in providing goods or services to Tiffany understand and comply with this Code of Conduct.

Suppliers are expected to self-monitor in line with this Code of Conduct. Suppliers must also permit Tiffany or its agents to audit or inspect their facilities to verify compliance. During such visits, which may be scheduled or unscheduled, all workers must be free to communicate outside the presence of management and without the threat of reprisal.

Tiffany seeks to work collaboratively with its Suppliers towards continuous improvement in responsible business practices. However, we reserve the right to cancel outstanding purchase contracts, suspend future purchase contracts or terminate our relationship with a Supplier where circumstances demand.

For more information about Tiffany's sustainability practices, please visit [Tiffany.com/Sustainability](https://www.tiffany.com/sustainability). © 2019 Tiffany and Company. All rights reserved.