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**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549**

**FORM SD  
SPECIALIZED DISCLOSURE REPORT**

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**SIGNET JEWELERS LIMITED**

(Exact name of Registrant as specified in its charter)

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**Bermuda**

(State or other jurisdiction of incorporation or organization)

**1-32349**

(Commission File Number)

**Not Applicable**

(IRS Employer Identification No.)

**Clarendon House, 2 Church Street, Hamilton HM11, Bermuda**

(Address of principal executive offices and zip code)

**David A. Bouffard, Signet Vice President, Corporate Affairs, +1 330-668-5369**

(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

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**Introduction:**

Signet Jewelers Limited, NYSE: SIG, (“**Signet**” or the “**Company**”) is the largest specialty jewelry retailer in the United States, Canada, Puerto Rico and the United Kingdom.

In accordance with Section 13(p) of the Securities Exchange Act of 1934 (“**Exchange Act**”) and Rule 13p-1 thereunder, Signet has filed this Specialized Disclosure Form (“**Form SD**”) and the Conflict Minerals Report (“**Report**”), attached hereto as Exhibit 1.01, and posted this Form SD and the attached Conflict Minerals Report to the Company’s public website at [www.signetjewelers.com](http://www.signetjewelers.com).

Signet has adopted a Conflict Minerals Policy (“**Policy**”) to support our Company’s goal of ensuring that none of the conflict minerals designated under Section 13(p) of the Exchange Act - which are gold, tin, tantalum and tungsten (“**3TGs**”) - that are necessary to the functionality or production of any of the products that Signet manufactures or contracts with other entities to manufacture, specifically jewelry, gift products and associated products (together, “**Products**”) contribute to armed conflict anywhere in the world, but most particularly in the Democratic Republic of Congo (“**DRC**”) and the adjoining countries of the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (together, “**Covered Countries**”).

As part of this Policy, Signet has established and implemented a Responsible Sourcing Protocol (“**SRSP**”) for all suppliers of Products. These measures, along with other due diligence measures described in the Conflict Minerals Report attached hereto as Exhibit 1.01, are designed to conform to the internationally-recognized framework set forth in the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict- Affected and High Risk Areas: Third Edition, including the related supplements on gold, tin, tantalum and tungsten (together, “**OECD Due Diligence Guidance**”), and reflected in other industry due diligence frameworks that are commonly considered to be compliant with the OECD Due Diligence Guidance.

Signet’s Conflict Minerals Policy and the SRSPs can be found on the Company’s website at [www.signetjewelers.com/corporate-responsibility/responsible-sourcing](http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing).

**As a result of the development and implementation of the SRSPs, and other due diligence measures described in the accompanying Conflict Minerals Report, Signet hereby declares that Signet products, or products containing necessary conflict minerals (3TGs) used by Signet in the manufacture (directly or indirectly, pursuant to contract with third parties for such manufacture) of such Products are DRC conflict-free as that term is defined in Exchange Act Section 13(p), and Rule 13p-1 and Item 1.01(d)(4) of Form SD thereunder. Please see the accompanying Conflict Minerals Report for more information on the factual basis for this conclusion.**

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## **Section 1 - Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

#### **Signet Products**

In accordance with the requirements of Exchange Act Section 13(p), and Rule 13p-1 and Form SD thereunder, Signet has determined in good faith with respect to all Products manufactured in calendar-year 2019 either directly or indirectly (via contract) through third parties by Signet that, during calendar year 2019:

- a) Signet has manufactured or contracted with other entities for the manufacture of Products to which certain “**Conflict Minerals**” (now defined as gold, columbite-tantalite (coltan), cassiterite, wolframite or their derivatives, which means in addition to gold, tantalum, tin and tungsten) are necessary to the functionality or production of such Products (“**necessary Conflict Minerals**”).
- b) Signet conducted a good-faith reasonable country of origin inquiry (“**RCOI**”) that was reasonably designed to determine whether any of the Company’s necessary Conflict Minerals originated in the Covered Countries and/or came from recycled or scrap sources. Based on this RCOI, which included the use of SRSP surveys as described more fully in the accompanying Conflict Minerals Report, Signet knows or has reason to believe that a portion of its necessary Conflict Minerals originated or may have originated in the DRC or an adjoining country. With respect to all other necessary Conflict Minerals contained in the Products, based on its RCOI, Signet has determined that it has no reason to believe that any such materials may have originated in the DRC or an adjoining country, or did not come from recycled or scrap sources.
- c) Signet exercised due diligence on the source and chain of custody of its necessary Conflict Minerals, as described more fully in the attached Conflict Minerals Report. Based on this due diligence, and as further described in this Conflict Minerals Report, Signet has reasonably determined that all of its Products containing necessary Conflict Minerals are “DRC conflict free” within the meaning of Exchange Act Section 13(p), and Rule 13p-1 and Item 1.01(d)(4) of Form SD thereunder. Further details are contained in the Company’s Conflict Minerals Report (Exhibit 1.01).

As previously noted, both this Form SD and the attached Conflict Minerals Report are posted on Signet’s website at [www.signetjewelers.com/corporate-responsibility/responsible-sourcing](http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing).

### **Item 1.02**

Signet has hereby filed, as Exhibit 1.01 to this Form SD, the Conflict Minerals Report for its Signet Products, or products containing necessary Conflict Minerals that were manufactured, or contracted with third parties to be manufactured, in calendar year 2019 by Signet, as required by Items 1.01 and Item 1.02 of this Form SD.

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

Exhibit 1.01 - [Signet Jewelers Limited’s Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.](#)

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**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

**Signet Jewelers Limited**

Date: May 20, 2020

By:



Name:

**Lynn Dennison**

Title:

**Chief Legal & Strategy Officer and Corporate Secretary**

**SIGNET JEWELERS LIMITED**  
**CONFLICT MINERALS REPORT**  
**FOR THE REPORTING PERIOD FROM**  
**JANUARY 1 TO DECEMBER 31, 2019**

## 1: INTRODUCTION AND SUMMARY OF CONFLICT MINERALS REPORT

This Conflict Minerals Report demonstrates how Signet Jewelers Limited ("**Signet**") has been at the forefront of responsible sourcing in all of retail and especially in the global jewelry supply chain. Signet has developed and implemented rigorous protocols for sourcing, including its supplies of gold, tin, tungsten and tantalum (each deemed a "**Conflict Mineral**" as further discussed below) to ensure that all such minerals **contained in Signet jewelry and gift products, including components, manufactured in calendar-year 2019 qualify as "DRC conflict free"** as defined in Section 13(p) of the Securities Exchange Act of 1934, as amended ("**Exchange Act**"), and Rule 13p-1 and Form SD thereunder (collectively, the "**Rule**").

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

This Conflict Minerals Report for Signet is provided, in accordance with Exchange Act Section 13(p) and Rule 13p-1 and Form SD thereunder, for the reporting period from January 1 to December 31, 2019. Rule 13p-1 and Form SD were adopted by the Securities and Exchange Commission (the "**SEC**") in 2012 to implement reporting and disclosure requirements related to conflict minerals as directed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("**Dodd-Frank Act**"), much of which is now codified as Section 13(p) of the Exchange Act.

Exchange Act Section 13(p), Rule 13p-1 and Form SD together impose certain reporting obligations on SEC registrants whose manufactured products contain gold, tin, tantalum or tungsten (defined by Section 13(p), Rule 13p-1 and Item 1.01(d)(3) of Form SD as "**Conflict Minerals**"), and who have reason to believe that the products they manufacture, or contract to manufacture, contain conflict minerals that are necessary to the production or functionality of those products ("**necessary Conflict Minerals**"). If the SEC registrant has reason to believe that any of those necessary conflict minerals did originate, or may have originated, in the Democratic Republic of the Congo (DRC) or an adjoining country (together with DRC, the "**Covered Countries**") and did not come from recycled or scrap materials, or is unable to determine the country of origin of those conflict minerals, the SEC registrant is required to file a Conflict Minerals Report with the SEC under cover of Form SD that includes a description of the measures it took to exercise due diligence on the conflict minerals' source and chain of custody. In addition, this Report must be posted on the registrant's website.

Signet has adopted a Conflict Minerals Policy and, as part of that Policy, established the Responsible Sourcing Protocol ("**SRSP**") for suppliers of products that Signet manufactures or contracts with third parties to manufacture, specifically jewelry, gift products and associated products, along with any components thereof ("**Products**") that contain gold and/or tin, tantalum or tungsten ("**3Ts**"). In 2017, Signet introduced a SRSP for diamonds as a compliance requirement for all suppliers, followed by a SRSP for silver and platinum group metals in 2018, and for colored gemstones in 2019 and in 2019 introduced the SRSP for diamonds in the supply chain for R2Net, an acquisition which was completed in September 2017. Note that diamonds, silver, platinum group metals and colored gemstones are not defined as Conflict Minerals subject to the filing and disclosure requirements of Exchange Act 13(p) and Rule 13p-1 and Form SD adopted thereunder.

The SRSP is designed not only to conform to the internationally-recognized due diligence framework designated by the SEC, the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, and Supplements for gold and the 3T's, respectively (collectively, "**OECD Due Diligence Guidance**"), as discussed below, but also to ensure that none of the gold or 3Ts (collectively "**3TG**") included in Products sold by Signet contributes to conflict anywhere in the world, including but not limited to the Covered Countries. All of Signet's global suppliers of Products are required to comply with the SRSP through an annual reporting procedure. Suppliers providing these annual SRSP compliance reports may be required by Signet to undertake an independent third-party audit of the SRSP compliance report by accredited audit companies ("**Signet SRSP audit**").

**As a result of the development and implementation of the SRSP, Signet has reasonably determined that all Products containing gold, tin, tantalum or tungsten necessary to the production or functionality of such Products that were manufactured (directly or by third parties) in 2019, are "DRC conflict free" as defined in Exchange Act Section 13(p), Rule 13p-1 and Item 1.01(d)(4) of Form SD.**

Signet's Conflict Minerals Policy and the SRSPs can be found on the Company's website at <https://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/>.

As reflected in the Conflict Minerals Policy and our actions thereunder as described herein, Signet is fully committed to the responsible sourcing of its products and the respect of human rights, and Signet expects the same from its suppliers around the world. Signet continually strives to assure its customers, employees, investors and other stakeholders that its supply chain avoids action that may directly or indirectly finance armed conflict and serious human rights violations around the world, including but not limited to the Covered Countries.

Signet has been at the forefront of responsible sourcing in all of retail and especially in the global jewelry supply chain. Signet is a Founding and Certified Member of the Responsible Jewellery Council ("**RJC**"), an organization that is committed to promoting responsible ethical, human rights, social and environmental practices throughout the jewelry supply chain. As a founding member and active participant, Signet fully supports the RJC's membership Code of Practices and Chain of Custody standards and recognizes the RJC's certification audit as equivalent to the Signet audit for purposes of compliance with the SRSP ("**Signet SRSP audit**"). Accordingly, Signet suppliers which are RJC Certified Members and which include compliance with the SRSP as a "**Provenance Claim**" (as defined in the RJC's Code of Practices) are deemed to be exempt from Signet SRSP audits.

When Section 1502 of the Dodd-Frank Act was enacted in 2010, most of which has been codified in Exchange Act Section 13(p), Signet publicly supported the policy reflected in this legislation. During the comment period on the SEC's proposed implementing rules under Exchange Act Section 13(p), Signet 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.

Beginning in 2014 (for the calendar-year reporting period ending December 31, 2013), Signet has filed a Form SD and an accompanying, independently audited Conflict Minerals Report ("**CMR**") stating that, after conducting the

OECD-prescribed due diligence called for under Exchange Act Section 13(p), and Rule 13p-1 and Form SD adopted thereunder, Signet has determined that its jewelry and gift products containing gold, tin, tungsten, or tantalum ("**3TG**") are DRC conflict-free. Signet obtained an independent, third party audit ("**IPSA**") as part of its due diligence efforts in connection with each of the past seven calendar-year reporting periods, including the preceding calendar year ended December 31, 2019, in accordance with SEC requirements.

As in previous years, Signet's CMR for this past year, 2019, 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 and the SEC's rules thereunder, as well as internationally recognized industry guidance and standards. While continuing to work on improving its own supply-chain compliance procedures, Signet has also actively shared its processes and protocols with others in the jewelry industry and beyond and has worked toward the development of harmonized and mutually recognized industry standards and supply chain audits, especially with respect to RJC certification audits, as noted above.

Signet is also active in cross-sector coalitions and working groups that reach beyond the jewelry industry, such as the Retail Industry Leadership Association ("**RILA**") to ensure that companies in a variety of industries respect human rights and avoid contributing to armed conflict. Signet supports the OECD Due Diligence Guidance, which is the foundation for SEC-prescribed conflict minerals due diligence, the London Bullion Market Association's ("**LBMA**") Responsible Gold Guidance, the Responsible Minerals Initiative ("**RMI**"), and the Responsible Jewellery Council's ("**RJC**") Code of Practices and Chain of Custody standards. Finally, as discussed above, Signet has long been committed to full compliance with the Dodd-Frank conflict mineral due diligence and reporting requirements as implemented by SEC rulemaking. Based on these regulatory requirements and complementary international standards and guidance, Signet developed the Signet Responsible Sourcing Protocol ("**SRSP**").

The purpose of the SRSP is to outline practical procedures that will reasonably ensure that any "necessary Conflict Minerals" contained in our Products qualify as "DRC conflict-free". Under the terms of the SRSP, suppliers must ensure and warrant that the sources (including refineries and smelters) used to process 3TG contained in Products supplied to or manufactured for Signet are in conformance with the SRSP and are therefore "DRC conflict-free" (as defined by Exchange Act Section 13(p)) pursuant to standards and protocols which are widely recognized as being consistent with OECD Due Diligence Guidance, such as those offered by LBMA, RMI and RJC. The SRSP was established as company policy effective January 1, 2013 and require Signet's suppliers to certify and independently verify that supplies of Products (including components thereof) to Signet are compliant with the SRSP.

Signet does not specify which individual gold refiners or 3Ts smelters the suppliers or participants in its supply chain must use, but instead requires all its suppliers to source 3TG from refiners and/or smelters which are certified under accredited standards and certification procedures, designed to conform to or be consistent with the OECD Due Diligence Guidance framework. Such procedures include (but are not limited to) the LBMA's "Good Delivery" and Responsible Gold standards, the China Chamber of Commerce of Metals, Minerals and Chemicals Importers & Exports Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, the RMI's Conflict Free Smelter Program ("**CFSP**") and the RJC's Code of Practices and Chain of Custody standards.

Signet recognizes the important role that artisanal and small-scale mining plays in the gold, 3Ts and other supply chains. To help develop and implement responsible sourcing practices in the gold supply chain from areas of conflict, Signet was a founding member of the Responsible Artisanal Gold Solutions Forum ("**RAGSF**"), a multi-stakeholder coalition including supply chain participants, civil society, trade organizations and government observers which seeks to learn about and address critical barriers to the production and trade of artisanal gold from the Great Lakes Region of Central Africa in a way that verifiably meets national, regional and international laws and standards for responsible sourcing.

In 2018, as part of RAGSF, Signet received jewelry including gold from the first supply chain designed to source conflict-free artisanal gold from the DRC for inclusion in products sold to consumers in the United States., demonstrating the ability to source verified responsible gold from artisanal sources in the DRC and African Great Lakes Region. This was the first traced artisanal gold sourced from the DRC to be refined by a London Bullion Market Association ("**LBMA**") "Good Delivery" certified refinery, demonstrating the effectiveness of due diligence systems and that responsible, international companies can engage in the region. It was also the first conflict-free, artisanal gold conforming to international due diligence standards (OECD, LBMA) to be exported from DRC to a U.S. jeweler, demonstrating Signet's commitment to the support of economic development in the conflict-affected region while avoiding illicit trade. This project included the first mine site and exporter to pilot the DRC government Ministry of Mine's "ITOA" traceability system (Initiative de Traçabilité de l'Or d'Exploitation Artisanale). The gold was refined in the U.S. by Asahi Refining, manufactured into gold jewelry products by Richline Group and sold through Signet's U.S. retail stores. The gold met the "Good Delivery" refining and due diligence standards of the LBMA, which conform to the OECD Due Diligence Guidance framework, and therefore met the requirements of the SRSP. The pilot project engaged Better Sourcing Program for detailed due diligence, an independent mineral supply chain due diligence implementation and assurance program, designed to ensure upstream supply chain compliance with international standards, and to provide a framework for the sustainable procurement of materials from areas where mining can significantly contribute to local economic and social development. No gold from the RAGSF project was received by Signet in 2019.

For the calendar year reporting period from January 1 through December 31, 2019, through the implementation of the SRSP, Signet conducted a good faith reasonable country of origin inquiry ("**RCOI**") and exercised due diligence on the source and chain of custody of the Conflict Minerals that are necessary to the production or functionality of the Products ("**necessary Conflict Minerals**") that Signet manufactured or contracted with others to manufacture and that were so manufactured from January 1, 2019 through December 31, 2019, for which the results were as follows:

- Signet determined that its suppliers of Products containing necessary Conflict Minerals complied with the SRSP, and through this RCOI and performance of due diligence as discussed further below, Signet reasonably determined that no Products manufactured by or for Signet in calendar-year 2019 contain necessary Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries. Accordingly, those Products that contain necessary Conflict Minerals are considered DRC conflict free as defined in Section 13(p) of the Exchange Act, Rule 13p-1 and Item 1.01(d)(4) of Form SD, even though some of those DRC conflict free sources of 3TG originated or may have originated in the Covered Countries. More specifically:

- Signet determined that, while a single source of tin from one direct supplier originated in the DRC and/or an adjoining country, this mineral was processed by a smelter which was found, based on an independent third party supply chain audit, to be "conformant" under RMI's RMAP standards and is thereby listed by the RMI as a "RMAP-conformant smelter or refiner" (See list of RMAP Conformant Smelters and Refiners at <http://www.responsiblemineralsinitiative.org/smelters-refiners-lists/>, which means the smelter has undertaken an independent third party audit of its procurement activities and thereby demonstrated that all minerals processed originated from conflict-free sources. Based on the foregoing and all of our other due diligence measures, as discussed in more detail below, Signet believes that the tin provided by this supplier is "DRC conflict free" within the meaning of Exchange Act Section 13(p), and implementing Rule 13p-1 and Item 1.01(d)(4) thereunder.
- Because Signet's SRSP for gold is aligned with the LBMA's Responsible Gold Guidance, Signet had reason to believe that some gold supplies provided through the LBMA "good delivery" system may have originated in one or more of the Covered Countries. However, Signet determined that all such supplies, including the gold sourced from artisanal mines in the DRC through the RAGSF project (as described above) were refined by refineries which are certified as "conflict-free" as defined by the LBMA's Responsible Gold Guidance and accredited by the LBMA as a "Good Delivery" refiner after an independent third-party audit obtained by LBMA. This means that the refiner has undertaken an annual audit of its due diligence in accordance with OECD Due Diligence Guidance, and exercised controls and transparency over its gold supply chains, including traceability and identification of other supply chain actors. Based on the foregoing, as well as our other due diligence measures as discussed below, we have concluded that these gold supplies are "DRC conflict free" within the meaning of Exchange Act 13(p), and SEC Rule 13p-1 and Form SD, Item 1.01(d)(4) thereunder.

## 2: DUE DILIGENCE MEASURES

Signet conducted due diligence on the source and chain of custody of its Products to ascertain whether such Products containing necessary Conflict Minerals originated in the DRC or any of its adjoining countries and, if so, whether they directly or indirectly financed or benefited "armed groups", as defined in Exchange Act Section 13(p), Rule 13p-1 and Form SD, Item 1.01(d)(2), in any of these countries. This due diligence, a process that has been developed and improved over more than 8 years, required a rigorous analysis of Signet's supply chains, and consultation with Signet's suppliers, as well as leading global organizations such as the OECD, the RJC, the LBMA, the RMI and the US Jewelers Vigilance Committee ("JVC"). From this analysis and these consultations, Signet designed and implemented the Signet Responsible Sourcing Protocol ("SRSP"), introduced as company policy in early 2013 and continuously updated and improved, which have led the jewelry industry in providing guidance to suppliers to ensure Products supplied to Signet, which include "necessary" 3TGs are "DRC conflict free".

## A: Design of Due Diligence Measures: How the SRSP Was Developed

The Conflict Minerals due diligence measures in Signet's SRSP have been designed to conform with and exceed the OECD Due Diligence Guidance framework as applicable for tin, tantalum, tungsten, and gold for downstream companies (as the term is defined in the OECD Due Diligence Guidance), in all material respects.

Specifically, Signet designed its due diligence measures in accordance with the five-step framework of the OECD Due Diligence Guidance. Focusing on the design of Signet's due diligence framework:

1. Signet established strong Company management systems for Conflict Minerals supply chain due diligence and reporting compliance in its supply chain by:
  - a. establishing a dedicated project team, including representatives from various internal departments such as Legal, Corporate Affairs, Merchandising, Supply Chain and Internal Audit, as well as external experts with relevant experience in the supply chains of Conflict Minerals to develop and publicly communicate a company Conflict Minerals Policy, design and implement the SRSP, engage with and support industry-driven programs relating to supply chain guidance and standards developed by the private sector to conform to the OECD Due Diligence Guidance, and develop and implement internal policies and procedures to support the implementation of the SRSP;
  - b. ensuring that the development and implementation of the SRSP was harmonized with the OECD Due Diligence Guidance and also with other established international guidance and standards developed within or compatible with the OECD due diligence framework, all of which stipulate the criteria for (and mechanisms for achieving) a "conflict free" designation for gold, tin, tantalum and tungsten, such as the LBMA's Responsible Gold Guidance and Good Delivery List, and the RMI's List of RMAP Conformant Smelters & Refiners (formerly the Conflict-Free Smelter List published by the CFSI);
  - c. conducting a detailed international consultation process to review the SRSP with suppliers, industry organizations, trade associations, standards and certification bodies, auditors, civil society and governments;
  - d. implementing a policy whereby the largest 200 suppliers and all new suppliers to Signet are required to be members of the Responsible Jewellery Council ("**RJC**") and be certified by RJC's accredited third-party auditors at the earliest opportunity as compliant with the RJC's Code of Practices, including compliance with the SRSP as a "Provenance Claim". This certification by RJC is harmonized with Signet's audit policy, so such RJC-certified suppliers are exempt from Signet's SRSP audit, factory and social audits. This policy has significantly increased RJC membership in Signet's supply chain, whereby 96% of Signet's purchases in 2019 were from RJC members. This therefore constitutes a major contribution to Signet's supply chain risk assessment, due diligence process and independent third-party verification and audit. Moreover, these harmonization efforts have benefited the jewelry industry as a whole by facilitating compliance with the OECD Due Diligence Guidance;
  - e. incorporating an express contractual obligation to comply with the SRSP into supplier contracts, both to define and facilitate enforcement of Signet's expectations

of suppliers regarding sourcing of Conflict Minerals and reporting of information to Signet;

- f. creating and maintaining records relating to Signet's conflict minerals program in accordance with Signet's record retention policies and procedures;
- g. creating and making available resources for suppliers to contact Signet with questions, concerns, grievances or the identification and warning of risks in Signet's supply chain. These resources include a dedicated website, email and web-based helplines, webinars and direct consultations with the Signet project team.

2. Signet identified and assessed Conflict Minerals risks in its supply chain by:

- a. conducting a review of company records to identify direct suppliers of Products containing necessary Conflict Minerals (as previously noted, in the form of gold and the derivatives tin, tantalum and tungsten (collectively "**3TG**")). Signet's Products are supplied by more than 700 direct suppliers based on individual supplier vendor numbers. However, through a comprehensive review of company and supplier records (bill of materials, invoices, product line sheets, etc.), Signet was able to determine that over 200 of its direct suppliers do not supply Signet with Products containing any 3TG whatsoever. Further, more than 95% of the necessary 3TG in Signet's Products is supplied by fewer than 100 direct suppliers (see 2.B.1 below for more information);
- b. developing a SRSP compliance report and sending notice throughout 2019 to all suppliers of Products that they should complete that report. The SRSP compliance report is a reporting tool for suppliers to describe the sourcing methods they use to comply with the requirements of the SRSP. The SRSP requires Signet's direct suppliers to validate and certify that all sources of 3TG used in Signet products, including all subcontractors, are supplied in conformance with the SRSP. Suppliers are likewise notified that their validation of their own supply chains and the veracity of their SRSP compliance report may be subject to a third-party independent Signet SRSP audit;
- c. reviewing the SRSP compliance reports submitted by suppliers to determine if further information is required or if any risks can be identified for further examination and inquiry;
- d. following-up with suppliers of Products regarding the accuracy and completeness of their reporting, particularly those suppliers that supply significant amounts of Products containing necessary 3TG to Signet, to ensure that there is a reasonable basis for their claimed compliance with the SRSP. Through the SRSP compliance reporting process described in 2.B.2 below, Signet was able to determine that more than 99% of the 3TG minerals in its Products were from suppliers claiming to have supply chains that are in compliance with the SRSP;

- e. notifying all suppliers of Products containing 3TG that their SRSP compliance claims are subject to independent third-party Signet SRSP audit, and notifying a representative sample of suppliers that they are required to have their 2019 compliance reports independently audited by accredited third party auditors (see 2.B.4 below for more information); and
- f. as an active participant in industry initiatives such as the OECD Due Diligence Guidance, LBMA Responsible Gold Standard, RJC, and the RMI, Signet, through the implementation of the SRSP, leveraged the due diligence conducted on smelters and refiners, especially through (i) the LBMA's Responsible Gold Guidance and (ii) the RMI's RMAP;
  - i. LBMA's Responsible Gold Guidance for "Good Delivery" Refiners follows the five-step framework for risk-based due diligence set forth in the OECD Due Diligence Guidance, including in particular the requirements detailed in the OECD Gold Supplement adopted on 17 July 2012. All refiners producing LBMA good delivery gold must comply with this LBMA Responsible Gold Guidance in order to remain on the LBMA Good Delivery List. Any refiner applying to be a LBMA Good Delivery accredited Gold Refiner after 1 January 2012 must implement the *LBMA Responsible Gold Guidance* and pass an audit prior to becoming a member of the Good Delivery List (see <http://www.lbma.org.uk/responsible-sourcing>).
  - ii. The RMI's RMAP uses independent private sector auditors to audit the source, including mines of origin, and chain of custody of the Conflict Minerals used by smelters and refiners that agree to participate in the RMAP. The smelters and refiners that are found to be "RMAP conformant" are those for which the independent auditor has verified that the smelter or refiner conforms to the RMAP's assessment protocols.
- 3. Signet designed and implemented strategies to respond to Conflict Minerals risks identified by verifying that smelters and refineries in Signet's supply chain that source 3TG from the Covered Countries qualify as "conflict free" as defined under established international guidance and standards, such as the LBMA's Responsible Gold Guidance and Good Delivery List, and the list of RMAP Conformant Smelters & Refiners published by the RMI (see sections 2.B.1a and 2.B.2a below). Signet responded to identified risks through direct intervention by the Signet project team with suppliers, trade associations, standards and certification organizations and/or other identified participants in Signet's supply chain, as demonstrated in the Summary of Conflict Minerals Report above.
- 4. Signet contributed to independent third-party audits of the due diligence practices of Conflict Minerals smelters and refiners by participating in industry organizations such as the LBMA, the RJC and the RMI (see 2.B.3 below), and through notification of the requirement for independent audit of compliance with the SRSP by Signet suppliers (see section 2.B.4 below).
- 5. Signet reported on its Conflict Minerals supply chain due diligence activities (as per this Report and further information, including Signet's SRSP and Conflict Minerals Policy, available on the Signet website at <https://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/>).

## B: Due Diligence Measures Performed

Signet's due diligence measures performed for Products containing necessary Conflict Minerals whose manufacture was completed in calendar year 2019 included the following activities:

1. As part of its due diligence measures taken over the previous eight years, Signet conducted a survey of 85 direct suppliers to gather detailed information about Signet's supply chain and sources of necessary Conflict Minerals, which included questions about the refinery or smelter sources in accordance with OECD Due Diligence Guidance, and obligated those suppliers to make similar efforts to survey their supply chain and report the sources of necessary Conflict Minerals. The information gathered through this survey was updated, as suppliers were required to notify Signet regarding any changes that occur in their supply chain that would be material to the supplier's SRSPs compliance claims.
  - a. As a result of this survey, Signet determined that a single source of tin from one direct supplier originated in one or more of the Covered Countries and was processed by a smelter which is certified as "Conformant" under the RMI's RMAP, and therefore qualifies as "conflict free" within the meaning of Exchange Act Section 13(p), Rule 13p-1 and Form SD, Item 1.01(d)(4).
2. Throughout 2019, Signet contacted 736 suppliers based on individual supplier vendor numbers to complete compliance reports relating to the SRSP, receiving 619 replies as described in A.2.d. This represented 431 companies of which 363 replied as described in A.2.d. Suppliers were required to notify Signet regarding any changes that occur in their supply chain that would be material to the supplier's SRSP compliance claims.
  - a. As a result of these compliance reports and the alignment of the SRSPs for gold with the LBMA's Responsible Gold Guidance, Signet had reason to believe that some gold supplies provided through the LBMA's "good delivery" system may have originated in a Covered Country, all of which were refined by refineries certified and audited by LBMA as "conflict free" as defined by the LBMA Responsible Gold Guidance.
3. Signet supported programs such as the OECD Due Diligence Guidance, the RJC's Chain of Custody Standard and Provenance Claim Provision, LBMA's Responsible Gold Guidance, the Dubai Multi Commodities Centre's ("**DMCC**") Good Delivery Standard and the RMI's RMAP through participation in relevant conferences, review committees and other sub-committees.
4. As explained in Section A:1:d "Design of Due Diligence Measures", Signet's policy whereby suppliers join and become certified under the RJC's Code of Practices including compliance with the SRSP for relevant minerals as a "Provenance Claim" has resulted in 96% of all Signet's purchases in 2019 being sourced from RJC members. Signet reviewed the RJC membership list on a monthly basis to verify Signet suppliers' membership and certification status, along with Provenance Claims. From 2019, Signet's primary third-party audit assurance was through the suppliers' RJC certification scheme with relevant minerals as "Provenance Claims". For non-RJC members, Signet required identified suppliers to undertake an independent audit of their 2019 Compliance Report, based on Signet's risk assessment of that supplier and/or the supplier's SRSP compliance report.

### 3: DUE DILIGENCE DETERMINATION

After conducting due diligence on the source and chain of custody of those Products containing necessary Conflict Minerals, **Signet reasonably determined that each of the Products that the Company manufactures or contracts to manufacture whose manufacture was completed in calendar year 2019 and that contained any necessary Conflict Minerals is "DRC conflict free", as defined in Exchange Act Section 13(p), Rule 13p-1 and Item 1.01(d)(4) of Form SD.** These Products are those for which Signet determined that both the sourcing and production of these products was in accordance with the SRSP. As discussed above, the SRSP is both designed and implemented to adhere to the OECD Due Diligence Guidance. Our conclusion is that Signet's processes and the supplies of these necessary Conflict Minerals did *not* finance or otherwise benefit "armed groups" (as the term is defined in Exchange Act Section 13(p), Rule 13p-1 and Item 1.01(d)(2) of Form SD), in any of the Covered Countries.

### 4: INDEPENDENT PRIVATE SECTOR AUDIT

Signet's due diligence processes for the Products that contain necessary Conflict Minerals found to be "DRC conflict free" were audited by SGS, a specialist independent private sector auditor. SGS is the world's leading inspection, verification, testing and certification company. SGS is recognized as the global benchmark for quality and integrity, with more than 2,600 offices and laboratories worldwide. SGS's report can be found on pages 12 to 13 of this Conflict Minerals Report.



# INDEPENDENT AUDIT REPORT

## INDEPENDENT PRIVATE SECTOR AUDIT ON SIGNET JEWELERS LIMITED'S CONFLICT MINERALS REPORT

### SCOPE, OBJECTIVE AND METHODOLOGY OF THE AUDIT

SGS was commissioned by Signet Jewelers Ltd. (Signet) to conduct an independent audit of their Conflict Minerals Report for the reporting period from January 1 to December 31, 2019. The scope of this audit was limited to the following sections of this report:

#### 2: DUE DILIGENCE MEASURES

A: Design of Due Diligence Measures: How the SRSPs Were Developed B: Due Diligence Measures Performed

This audit did not attempt to evaluate the accuracy of the conclusions of Signet's due diligence process as described in the Conflict Minerals Report section 3: DUE DILIGENCE DETERMINATION.

We conducted this performance audit in accordance with US GAO Performance Audit standards and thereby in accordance with the US Generally Accepted Government Auditing Standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained, through a combination of pre-audit research, telephone interviews with relevant representatives of Signet USA and UK, as well as documentation and record review, provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit's objective was established in accordance with the Final Rule of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act 2010 relating to the use of conflict minerals and is to evaluate the information available and express an opinion or conclusion as to whether (A) the design of Signet's due diligence framework as described in the Conflict Minerals Report, with respect to the period covered by the report, is in conformity with, in all material respects, the criteria set forth in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition), and (B) whether Signet's description of the due diligence measures it performed as set forth in the Conflict Minerals Report, with respect to the period covered by the report, is consistent with the due diligence process that Signet undertook.

### STATEMENT OF INDEPENDENCE AND COMPETENCE

The SGS Group of companies is the world leader in inspection, testing, certification and verification, operating in more than 140 countries and providing services including management systems and service certification; quality, environmental, social and ethical auditing and training; environmental, social and sustainability report assurance. SGS affirm our independence from Signet Jewelers Ltd, being free from bias and conflicts of interest with the organization, its subsidiaries and stakeholders according to the GAGAS Conceptual Framework for Independence. The audit team was assembled based on their knowledge, experience and qualifications for this assignment and conducted the performance audit in accordance with the [SGS Code of Integrity](#).

## AUDIT CONCLUSIONS AND OPINION

On the basis of the methodology described and the verification work performed we believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our performance audit was conducted as planned. Interviewees were open and willing to assist in supplying evidence requested, including documentation and supporting records which were provided promptly.

We are satisfied that the design of Signet's due diligence framework, as described in their Conflict Minerals Report section 2A) is in conformity with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) in all material respects.

We are satisfied that the due diligence measures undertaken by Signet during the reporting period are consistent with the due diligence process described in their Conflict Minerals Report section 2B).

Signet has well established, strong management systems and underlying processes for Conflict Minerals supply chain due diligence and reporting compliance in its supply chain through the implementation of their SRSPs, integration of these into daily business practices and ongoing evaluation of compliance through their supply chain. In particular, Signet continues to ensure their due diligence practices through the SRSPs are fully harmonized with other internationally recognized initiatives, thereby enabling efficient uptake in their supply chain.

Our performance audit results indicate that Signet clearly takes a dynamic and proactive approach in the management of supply chain due diligence as a leader in this field.

**Signed:**  
For and on behalf of SGS North America Inc.



**MS. Effie Marinos**  
Sustainability Manager  
April 28, 2020



**Rebecca Bowens (Lead Auditor)**  
SGS United Kingdom Ltd.

**WWW.SGS.COM**