



WATCHES OF SWITZERLAND GROUP PLC

HUMAN RIGHTS POLICY

JULY 2023

WATCHES OF SWITZERLAND GROUP HUMAN RIGHTS POLICY

Watches of Switzerland Group ('the Group') is an international retailer of world leading luxury watch brands, with a growing complement of luxury jewellery brands. We employ over 2,550 colleagues across the UK, US and Europe and contract with almost 2,000 suppliers worldwide.

Treating people with respect is a fundamental value of the Group. We operate with integrity and transparency and we strive to respect and promote human rights in all our interactions and relationships.

The Group is committed to protecting the enjoyment of human rights for all and we operate in accordance with the International Bill of Human Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights).

The Group also takes into account the United Nations Framework and Guiding Principles as well as other internationally accepted human rights standards, including the OECD Guidelines for Multinational Enterprises and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and other core conventions.

We monitor all current and emerging human rights-related regulation including the UK Modern Slavery Act 2015 and ensure that our policies and practices evolve accordingly.

SCOPE

This Policy applies to all global business activities and everyone who works for us and everyone we do business with, including brand partners and other suppliers or vendors.

This Policy should be read and observed alongside the Group's Vendor Code of Conduct, Code of Ethics, Whistleblowing Policy, Modern Slavery Statement, the Board Diversity, Equality and Inclusion Policy and ESG Partner Standards.

OUR COMMITMENT

In implementing this Human Rights Policy, we commit to:

- Assessing the Group's impact on human rights in our operations and supply chain.
- Taking action to mitigate human rights risks in our operations and supply chain.
- Ensuring grievance mechanisms, including a confidential whistleblowing reporting process, are in place for everyone we impact to raise concerns.
- Remedying any adverse human rights impacts we cause, contribute to, or are linked with.
- Communicating our progress with stakeholders.

To meet these objectives, we will:

- Engage stakeholders with the ongoing development, implementation and evaluation of the effectiveness of this Policy.
- Develop and maintain in-house human rights expertise.
- Ensure relevant colleagues and departments understand how their work can impact on human rights, supported by timely and adequate training.
- Screen new suppliers for labour practices and human rights performance.
- Regularly review the Group's policies and procedures to ensure consistency with the principles of this Human Rights Policy.
- Implement adequate due diligence in our operations and supply chains. For our supply chain this includes, but is not limited to, supplier self-assessment questionnaires, supplier management and capability building activities, factory audits, and corrective action plans to address any non-compliance. We will use all or a combination of these due diligence methods based on the results of our ongoing supplier risk assessment.
- Ensure immediate remediation is provided if it is found human rights are adversely affected in our operations or supply chains.
- Report progress against our commitments to the ESG Committee, our Board, internally to colleagues and publicly via our annual Modern Slavery Statement.

We take allegations of human rights abuse in all its forms extremely seriously and will not tolerate human rights abuses against anyone working for our Group, or individuals or groups in any way associated with our business.

We are committed to building strong, long-term relationships with our stakeholders and will always collaborate to resolve issues, wherever possible. However, if we find evidence of a serious breach of our terms, we will not hesitate to terminate our contract, make a public disclosure and notify the relevant authorities.

RESPONSIBILITIES

The Board of Watches of Switzerland Group PLC is committed to ensuring that all of the Group's activities are conducted in accordance with all applicable legal and regulatory requirements and the highest standards of ethical business conduct.

This Policy is owned by our Board, which receives regular updates on our human rights performance to ensure suitable support is available for its implementation.

All colleagues are required to comply with this policy and undertake diligently and expeditiously such training as the Group may provide or otherwise specify from time to time.

REPORTING A CONCERN

The Group does not engage in or tolerate any form of conduct which fails to comply with the requirements and spirit of the Policy.

Any concerns that the terms of this Policy are not being correctly adhered to, should be raised in accordance with the Group's Whistleblowing Policy.

The Human Rights Policy will be reviewed annually by the Watches of Switzerland Group PLC Board.

The Policy was approved by the Watches of Switzerland Group PLC Board on 11 July 2023.