

## Movado Group Supply Chain Policy Regarding Gold

Effective: December 1, 2020

Movado Group is committed to taking reasonable measures to ensure that no gold contained in and that is necessary for the production or functionality of any of its products has, directly or indirectly, financed or benefitted any non-state armed groups (as identified by relevant UN Security Council Resolutions or by the United States in any annual Country Report on Human Rights Practices under sections 116(d) and 502B(b) of the Foreign Assistance Act of 1961) in the Democratic Republic of Congo (“DRC”) or any country that has an internationally recognized international border with the DRC (“Covered Countries”). Accordingly, Movado Group aims to accept gold only from suppliers that certify that they have used all commercially reasonable efforts to ensure that such gold is “conflict free.” These requirements apply to all gold products (finished and components) and to all products plated with or otherwise containing gold.

Movado Group suppliers are expected to certify the source of gold supplied to Movado Group, either by certification of all gold manufacture and supply or, if this is not possible, by segregating manufacture and supply of gold to the Movado Group from manufacture and supply of gold to other customers.

### 1. Refineries

Suppliers may certify that gold supplied to Movado Group meets these requirements if the gold is sourced from refinery sources satisfying at least one of the following:

- 1.1 Gold refiners on the current LBMA good delivery list (see [www.lbma.org.uk](http://www.lbma.org.uk), “Good Delivery”, “Gold List”); or
- 1.2 Gold refiners on the EICC/GeSI conflict-free compliant smelter list (currently under consideration, list tbc) (see [www.conflictreesmelter.org](http://www.conflictreesmelter.org)); or
- 1.3 Gold refiners which are certified Members of the Responsible Jewellery Council (RJC) (see [www.responsiblejewellery.com/members/certified-members](http://www.responsiblejewellery.com/members/certified-members)); or
- 1.4 Gold refiners which certify and independently audit all gold supplies as conflictfree, in accordance with one of the following guidelines/standards:
  - i. RJC Chain of Custody Standard for Precious Metals  
(see [www.responsiblejewellery.com/chain-of-custody-certification](http://www.responsiblejewellery.com/chain-of-custody-certification))
  - ii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold (see [www.oecd.org](http://www.oecd.org) search “conflict minerals”)
  - iii. World Gold Council Conflict-free Standard  
(See [www.gold.org/about](http://www.gold.org/about) gold/sustainability/conflict free standard)

## 2. Banks

Suppliers may certify that gold supplied to Movado Group meets these requirements if the gold is sourced from Banks satisfying at least one of the following:

- 2.1 Banks which certify and independently audit that all gold is supplied from refineries which fulfill the criteria under "Refineries" as above; or
- 2.2 Banks which certify and independently audit that all gold supplies are conflict-free, in accordance with one of the following guidelines/standards:
  - i. RJC Chain of Custody Standard for Precious Metals  
(See [www.responsiblejewellery.com/chain-of-custody-certification](http://www.responsiblejewellery.com/chain-of-custody-certification))
  - ii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold  
(see [www.oecd.org](http://www.oecd.org) search "conflict minerals")

## 3. Precious Metals Trading Companies/Alloy Suppliers

Suppliers may certify that gold supplied to Movado Group meets these requirements if the gold is sourced from precious metals trading companies and alloy suppliers satisfying at least one of the following:

- 3.1 Companies which certify and independently audit that all gold is supplied from refineries and/or banks which fulfill the criteria under "Refineries" and "Banks" as above; or
- 3.2 Companies which certify and independently audit that all gold supplies are conflict-free, in accordance with one of the following guidelines/standards:
  - i. RJC Chain of Custody Standard for Precious Metals  
([www.responsiblejewellery.com/chain-of-custody-certification](http://www.responsiblejewellery.com/chain-of-custody-certification))
  - ii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold (see [www.oecd.org](http://www.oecd.org) search "Conflict Minerals")

## 4. Assemblers and Suppliers of Component Parts and/or Finished Products Including their Subcontractors and Sub-suppliers

Suppliers may certify that gold supplied to Movado Group meets these requirements if the gold is sourced from assemblers and suppliers (including from each subcontractor and supplier in the supply chain) of component parts and/or finished products that satisfy at least one of the following:

- 4.1 Assemblers and suppliers which certify and independently audit that all gold is supplied from refineries, banks and/or precious metals trading companies which fulfill the criteria under "Refineries", "Banks" and "Precious Metals Trading Companies" as above, and scrap/recycled gold as below; or

- 4.2 Assemblers and suppliers which certify and independently audit that all gold supplies are conflict-free, in accordance with one of the following guidelines/standards:
- i. RJC Chain of Custody Standard for Precious Metals  
(see [www.responsiblejewellery.com/chain-of-custoday-certification](http://www.responsiblejewellery.com/chain-of-custoday-certification))
  - ii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold (see [www.oecd.org](http://www.oecd.org) search “conflict minerals”)

## 5. Scrap and Recycled Gold

Suppliers may certify that gold supplied to Movado Group meets these requirements if the gold is sourced from suppliers satisfying at least one of the following:

- 5.1 Suppliers which certify and independently audit that all scrap and recycled gold is identifiable as its own production and supply, i.e. that the scrap gold is:
  - i. Returned product from customers, or
  - ii. Faulty inventory, or
  - iii. Scrap and waste gold arising during manufacturing; or
- 5.2 Suppliers which certify and independently audit that all scrap and recycled gold is acquired accordingly to Know Your Customer/Counterparty principles (“KYC”), which require business to establish the identity of all organizations with which they deal, have a clear understanding of their business relationships and have a reasonable ability to identify and react to transaction patterns appearing out of the ordinary or suspicious; or
- 5.3 Suppliers which certify and independently audit that all gold supplies are conflict-free, in accordance with one of the following guidelines standards:
  - i. RJC Chain of Custody Standard for Precious Metals  
(see [www.responsiblejewellery.com/chain-of-custody-certification](http://www.responsiblejewellery.com/chain-of-custody-certification)); or
  - ii. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Supplement on Gold (see [www.oecd.org](http://www.oecd.org) search “conflict minerals”)

This Policy was approved by Movado Group’s Board of Directors and Chief Executive Officer on November 19, 2020.