

CODE OF CONDUCT

2024 EDITION



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Dear colleagues,



Rolex is built around its fundamental values – the never-ending quest for quality, the spirit of innovation, the pursuit of excellence – which inspire each of our efforts and define our identity. These principles, previously passed on informally throughout our history, are now presented in this Code of Conduct.

Faced with the key issue of sustainability, we thought it crucial to formalize our commitments in this document, by describing the values, ethics and internal standards that have shaped our company since the beginning.

This Code of Conduct forms part of our global sustainability strategy. It defines a framework within which Rolex, its employees and external associates make a joint commitment to ethical and responsible business conduct.

Based on our core values, it advocates, among other things, a healthy working environment, integrity in our business activities and the preservation of our way of doing things.

Distributed and applied in Switzerland and in all our affiliates abroad, it commits every employee of our Group to respecting its rules.

I would ask you to familiarize yourself with it and share it with others, and I appeal to the personal responsibility of each and every one of us to observe and perpetuate its principles.

Thank you for your commitment to our shared vision.

A handwritten signature in blue ink, consisting of several sharp, vertical strokes followed by a horizontal line, representing the name Jean-Frédéric Dufour.

Jean-Frédéric Dufour
Chief Executive Officer
Rolex SA

PREAMBLE

Created to last. Rolex's philosophy is based on values of excellence and innovation and the concept of sustainability. This philosophy is also part of a strict ethical framework, the main principles of which are set out in this Code of Conduct. It is an integral part of the approach to sustainability taken by Rolex and its governance bodies. It complements the brand's approach to responsible business conduct. It is based in particular on the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the UN Sustainable Development Goals. Internally, it is supplemented by relevant regulations and the Sustainable Development Charter, which formalizes the commitment of our partners in this area.

SCOPE OF THE CODE OF CONDUCT

This Code of Conduct formalizes the commitment of Rolex and its employees, both internal and external, to conduct the company's business responsibly. It is distributed and applied to all Group companies in Switzerland and abroad, and in compliance with applicable law. Each employee undertakes to respect it.

FUNDAMENTAL PRINCIPLES AND VALUES

The principles of the Code of Conduct form the ethical framework within which Rolex operates. They relate to promoting a healthy and stimulating working environment, integrity in business management, as well as environmental protection.

Rolex employees are brand ambassadors. Their behavior must therefore comply with the Code of Conduct and align with the company's fundamental values:

- **Excellence:** by working with the utmost rigor and an ideal of perfection.
- **Quality:** by applying this requirement to the product and on a daily basis in all activities.
- **Innovation:** by developing new techniques and innovative solutions.
- **Sustainability:** by transforming the company's value chain to make it more sustainable and responsible.
- **Soft skills:** by working together with respect and goodwill.

A RESPONSIBLE EMPLOYER

Creating a healthy, respectful and rewarding work environment

PROMOTING HEALTH, SAFETY AND WELL-BEING AT WORK

Employee well-being includes:

- Creating an environment and working conditions conducive to the personal development of each and every employee.
- Flexible working hours.
- Identifying risks.
- Preventing occupational accidents and diseases.
- Preventing physical and psychosocial risks such as violations of personal integrity (psychological or sexual harassment for example).
- Care and support for employees experiencing difficult personal situations.
- Awareness-raising and training initiatives.

In keeping with its core values, Rolex creates a healthy, safe and respectful working environment that promotes the physical, mental and emotional well-being of all employees. To achieve this, Rolex has implemented policies, programs and resources to support employee fulfillment and is committed to a process of continuous improvement.

COMBATTING HARASSMENT

Regardless of the nature or means, harassment includes any attitude intended to destabilize, belittle, isolate or exclude an individual or individuals. In this respect, harassment is a form of deliberately hostile behavior, regardless of the hierarchical link between the persons concerned.

The company does not tolerate any form of harassment and has put in place measures to raise awareness and prevent these situations through clear guidelines (available in the relevant internal regulations) on expected behavior. Harassment can be subject to disciplinary sanctions and, in many countries, criminal prosecution.

FOSTERING AN INCLUSIVE AND FAIR WORKING ENVIRONMENT

An inclusive and fair environment is based in particular on the equality of opportunity and treatment, as well as a commitment to combat any form of discrimination, whether on the basis of gender, religion, ethnic origin, age, sexual orientation, any form of disability or any other characteristic to the extent protected by law.

Rolex recognizes that a diverse range of experience, perspectives and talents is a valuable asset for the company. As a result, employees receive fair treatment from the company, without discrimination. All employees also benefit from an environment in which everyone can achieve their potential and contribute fully, both personally and professionally, to the company's success.

PROTECTING PERSONAL DATA

Protecting personal data requires strict security protocols and an information viewing policy which ensures that the people concerned have the right to view, modify or delete their personal data. Only personal data required for the stated purposes may be collected, processed and used. By implementing dedicated procedures, Rolex undertakes to protect the personal data of all the people concerned, to collect and process it in accordance with the relevant legal provisions.

BUSINESS ETHICS

Acting with integrity, responsibility and transparency

ENSURING BUSINESS CONFIDENTIALITY

Employees are responsible for tangible or intangible information of any scientific, technical, commercial, financial or other nature, transmitted orally or in writing or in any other way.

Rolex has put in place technical and organizational measures to preserve the confidentiality of its business. This also involves a ban on the publication and sharing of internal professional content, particularly on social media. Employees undertake to comply with the brand's rules of conduct on social media and personal websites as well as to ensure the integrity of the company's reputation. This discretion protects the know-how, business secrets and integrity of the company's stakeholders.

REJECTING CORRUPT PRACTICES

Corruption is an offense generally sanctioned by applicable criminal law in the countries in which we operate. In particular, the Swiss Criminal Code prohibits the corruption of Swiss or foreign public officials, private corruption and the granting of an advantage.

This includes offering, promising or giving a direct or indirect benefit or gift to an employee in order for them to act or omit to act, in the performance of their duties, in breach of these duties or at their own discretion. Generally speaking, it is defined by the desire to influence someone to perform or not to perform an act in return for a benefit.

In this context, Rolex prohibits any type of corruption. It is the responsibility of each individual to ensure that they are not corrupt or corrupted. Rolex invites its employees to take an active role in sharing and defending this responsible principle. Rolex has a zero-tolerance policy towards corruption. Corrupt practices run counter to Rolex's business ethics, because the neutrality of a person's decision can be compromised by any type of benefit offered in exchange for such influence.

In addition to Rolex's anti-corruption policy, company employees must not solicit gifts or benefits. Furthermore, in the event of a gift being given, they must ensure that this is an unsolicited customary gift not exceeding the amount stated in the applicable internal regulations.

PREVENTING CONFLICTS OF INTEREST

A conflict of interest is defined by the existence of a personal connection that could lead an employee to make a choice that is detrimental to the company's interests. This may occur in particular when selecting potential business partners or employees. In order to protect the interests of employees and those of the company, Rolex pays particular attention to managing conflicts of interest. The company ensures market integrity and healthy competition. This means that the decisions made by Rolex employees are not influenced by personal interests. It thus promotes decision-making according to objective and transparent criteria.

PROMOTING FAIR COMPETITION

Unfair practices include abuse of dominant position, collusion with anti-competitive practices such as price fixing, market allocation, production or sales quotas, and other forms of collusion between companies that restrict competition, as well as transactions that lead to excessive market concentration, misleading advertising, dumping, state subsidies, and infringement of intellectual property rights.

In the same way that Rolex seeks to prevent conflicts of interest in its business conduct, the company makes every effort to maintain healthy relationships and trust with its peers and partners in order to ensure fair, free and equitable competition, in compliance with applicable laws.

COMBATTING MONEY LAUNDERING AND THE FINANCING OF TERRORISM

Money laundering is defined as any transaction that conceals the origin of funds acquired in a criminal/illegal manner by reinvesting them in legal activities. The fight against the financing of terrorism aims to deprive those responsible of the funds they need to carry out their activities.

Rolex implements organizational measures to prevent and identify the risks associated with money laundering and the financing of terrorism in accordance with the relevant legal provisions. The company expects its employees to be particularly vigilant in this regard.

SUPPORTING HUMAN RIGHTS

Human rights cover many areas, including forced labor, human trafficking, abuse, equality, all forms of discrimination and harassment, the violation of the right to freedom of assembly and association, and the right to decent working conditions (particularly in relation to health and safety).

Due to the nature of its activities and in line with its responsible purchasing policy, Rolex ensures that its activities are conducted in compliance with human rights. In this context, employees undertake to exercise vigilance throughout the supply chain.

ENVIRONMENT

Committing to preserving natural resources and placing sustainability at the heart of its activities

In its pursuit of excellence, Rolex strives to improve its environmental performance every day. In this context, environmental protection is a central concern for the company.

Rolex is committed to protecting nature by conducting its business responsibly. This includes implementing continuous improvement processes aimed at reducing its environmental impacts.

Rolex expects everyone to be aware of the importance of this commitment and to contribute to it through their behavior and business decisions.

Rolex creates products that are designed to last and that can be maintained for life. In addition, the company makes every effort to control its energy consumption and preserve the natural resources used in its activities. Rolex has implemented various performance indicators to monitor its carbon footprint, waste, air quality, chemicals, water, mobility and biodiversity.

The company is also taking action to reduce its polluting emissions as much as possible. It ensures the highest standards are applied in terms of traceability. In all areas – from supply to manufacturing and distribution – Rolex works with its employees across its entire value chain.

IMPLEMENTATION OF THE CODE OF CONDUCT

EMPLOYEES' INDIVIDUAL RESPONSIBILITY

On an individual level, employees must ensure that the principles set out in this Code are respected and adhered to.

Every employee, regardless of their responsibilities or duties, must report any behavior that violates the Code of Conduct to their line manager, to Human Resources, or via the online Alert System accessible via [rolex.com](https://www.rolex.com).

NON-COMPLIANCE WITH THE CODE OF CONDUCT

In the event of non-compliance with the Code of Conduct, Rolex takes appropriate action and applies sanctions commensurate with the seriousness of the breach, in accordance with its internal regulations and in compliance with applicable laws.

VERSION	DATE	CHANGE(S)
1	March 2024	Initial Code of Conduct
2	April 2024	Reference to the Rolex Alert System in the section “Employees’ individual responsibility.”