

Movado Group Conflict Minerals Policy

Effective: December 1, 2020

Movado Group will not be a party, directly or indirectly, to financing the violence, human rights violations, and armed conflict occurring in the Democratic Republic of Congo (“DRC”) and the countries that border it (the “Covered Countries”) associated with extracting, trading, handling, and exporting certain minerals, specifically, gold, cassiterite, columbite-tantalite (coltan), wolframite, and three specific ores and mineral derivatives, being tin, tantalum, and tungsten (“Conflict Minerals”). In addition to the DRC, the Covered Countries include: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

Movado Group renounces any action which contributes to the financing of conflict in the Covered Countries and commits to comply with all applicable laws, rules, and regulations, including Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the regulations of the United States Securities and Exchange Commission issued thereunder, as well as with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Movado Group does not directly source Conflict Minerals from mines, smelters, or refiners. Accordingly, Movado Group has adopted a [Supply Chain Conflicts Minerals Policy](#), which is incorporated into its [Vendor Code of Conduct](#) and supplier agreements, and Movado Group relies upon the cooperation of its suppliers in the implementation and enforcement of the Policy. Through regular interaction with and reports from its suppliers, Movado Group obtains information about Conflict Minerals’ country of origin, which it discloses on an SEC form. Movado Group’s most recent Conflicts Minerals report is available [here](#).

Movado Group regularly conducts compliance assessments. If we determine that a supplier may be in violation, we will take action appropriate to the circumstances. Such action may include demanding a corrective action plan and/or increased frequency of compliance checks up to and including termination of our business relationship with the supplier.

Questions or concerns about or suspected violations this Policy may be reported to Movado Group’s Ethics Hotline (00)1 201 267 8323, by correspondence to our global headquarters Attn: General Counsel at 650 From Road, Suite 375, Paramus, New Jersey 07652, or by informing a local Movado Group contact. Please note that due to local legal requirements, our hotline may not allow for reporting of certain types of matters in specific areas. In such circumstances, questions or concerns should be addressed to a Movado Group local contact or to Movado Group’s global headquarters.

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