Message from Breitling CEO, Georges Kern

Dear Breitling Squad,

At Breitling, our heritage and passion for what we do give us a competitive advantage in all our business endeavors. We know that Breitling's success requires responsible behaviors in our day-to-day activities based on our shared values – integrity, respect and responsibility.

This Code of Conduct outlines the fundamental guidelines that illustrate our shared commitment. It applies to all managers and employees of the Breitling group, irrespective of what they do or where they are.

By observing the principles of this Code of Conduct, you commit to make a decisive step towards our future success.

Thank you for your support,

Georges Kern
Chief Executive Officer

BREITLING - EMPLOYEE CODE OF CONDUCT

Responsible Employee	Breitling expects all employees to act with integrity and according to ethical principles. We are responsible for delivering on our commitments. We show respect to our colleagues and strive for a transparent and direct communication.
Diversity and Equality	We value diversity, promote equality and do not tolerate any type of discrimination or harassment. We strive to develop each employee's skills and we spread a culture of respect and collaboration. Our employment-related decisions, in particular our hiring, performance management and talent development processes, are taken based on objective requirements and qualifications.
Business Decisions	When taking a business decision, we carefully review financial risks and operational impacts and seek the appropriate internal approvals. We choose our business partners carefully and work only with partners who share our values. We ask all our partners to agree to our supplier code of conduct. Our commitments to our business partners are truthful and realistic.
Conflicts of Interests	We avoid situations in which our own personal interests conflict, or could conflict, with Breitling's business interests. For example, a conflict of interests may arise when working with close relatives or when having directly or through family or personal network a personal or financial interest in a Breitling supplier, customer or competitor. We disclose to our superiors without delay any actual or potential conflict of interests.
Anti-Corruption	We will not offer, pay, request or accept bribes. In particular, we never give money to employees, directors and officers of private or public third parties and we do not accept money from them. We do not promise or give, either directly or indirectly, anything of value (such as a gift or offer of entertainment) to, or request or accept from, employees, directors and officers of private or public third parties if the item is provided with the intention or appearance to influence decisions or to obtain any improper financial advantage or if it would harm our reputation. For example, during ongoing business negotiations nothing of value shall be given or accepted. We make sure that our partners who act on our behalf do not engage in any form of bribery. If we are unsure whether a gift or offer of entertainment is acceptable, we should seek guidance and obtain approval from our superior or from the Legal Department, prior to granting or accepting it. If we are offered an unacceptable gift or entertainment, we should politely decline it with an explanation that it cannot be accepted due to Breitling's compliance policy.
Fair Competition	While we strive to compete in the market, we must conduct ourselves ethically and comply with all competition laws as they apply throughout our global business. Competition laws are designed to provide a level playing field for all businesses. By way of example, we should not attempt to limit or distort competitive opportunities with price fixing, the allocation of markets or customers or through deception or inaccurate statements. Any competitor's confidential or proprietary information should be returned or destroyed if it is received unintentionally and the Legal Department should be notified if this happens.

BREITLING - EMPLOYEE CODE OF CONDUCT

Trade Compliance	As Breitling delivers products and services all around the world, it is exposed to various regulations related to international trade and financial transactions. In our business practice, we pay attention to export controls, embargoes, other trade sanctions or restrictions as well as customs regulations. In particular, we avoid direct or indirect business dealings with countries, entities or individuals subject to international sanctions.
Respect of Company Resources	We show respect to the premises, tools, equipment and cars which are at our disposal and we avoid unnecessary costs. We use company resources only for legitimate business purposes. We properly use and protect our information technology resources such as computers, telephones or software programs. We take appropriate steps to set up and maintain the protection of Breitling's intellectual property, for example through designs, patents and trademarks.
Confidential Matters and Data Protection	Any confidential information of Breitling, such as regarding new products or relationships with business partners, will be protected and not disclosed to anyone unless explicitly authorized by the competent person within Breitling. We protect the privacy and personal data of our customers and employees from access by unauthorized persons. We do not seek access to such personal data or to Breitling's confidential information unless for a legitimate business purpose. The confidentiality obligations to Breitling also continue after leaving the company.
Health, Safety, Environment and Communities	Breitling is committed to high standards of health, safety, and environmental protection. We conduct our operations safely and minimize the environmental impact of our business activities. We report unsafe equipment, premises, as well as any circumstances representing a health, environmental and safety hazard. We make efforts to reduce and to recycle our waste and our consumption of energy, water and raw material. We provide products that help our customers achieve their own sustainability ambitions. We support the social and economic development of the communities in which we operate our business, for example through civic activities, donations or volunteering.
Cautious External Communications	We recognize the benefits of personal social networks when used in a responsible way. We identify ourselves as an employee of Breitling when publishing or commenting a post. Our posts about Breitling and its products preserve Breitling's brand image. We never share confidential information on social networks and we do not use copyrights and other material owned by third parties. In case of doubt or when you see that subject matter, expertise is required to comment, seek guidance from a member of the Corporate Communication team before making a posting. Regarding press communications, our Corporate Communication team is solely in charge. Each employee must refrain from making any media announcement and any media request or inquiry must be immediately redirected to Corporate Communication representatives.
Legal Compliance and Industry Standards	We are committed to comply with all applicable laws, regulations, industry standards and Breitling internal policies. We place particular value in complying with laws regarding anti-corruption, production and sales of goods, trade restrictions, money laundering, conflicts of interests, anti-competition, labour, health and safety, environment as well as with industry standards related to products and responsible supply chains. We keep accurate and complete records of our business and we do not destroy documents in case of an investigation or audit. In case of conflicts between Breitling internal policies and local law, we should always observe the most restrictive requirement; if it is unclear what prevails, we will contact our superior or the Legal Department.

Management Role and Reporting	Breitling management actively promotes the shared values and principles of this Code of Conduct and ensures that the provisions in this Code of Conduct are applied globally. Breitling rejects any practice that is not consistent with this Code of Conduct. Violations will not be tolerated and will lead to disciplinary measures (up to and including termination) and may be subject to civil or criminal penalties. If you are in doubt, always ask. If you are involved in or become aware of something that is or may be in violation with our Code of Conduct, reach out to your superior or to the HR or Legal Department or use our anonymous reporting line and speak up to safeguard a transparent, safe and positive working environment.