

**SWAROVSKI Value Chain Due Diligence Statement (Modern Slavery, Child Labor Focus, Group-level)**

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Date	04 March 2026
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Geographic scope	Global / Group-level
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Reference to other documents	<ul style="list-style-type: none"> <li>- SWAROVSKI 2025 Sustainability Report</li> <li>- SWAROVSKI Code of Conduct</li> <li>- SWAROVSKI Supplier Code of Conduct</li> <li>- Speak Up Policy and Speak Up Channel Privacy Policy</li> <li>- Environment, Social, and Governance (ESG) Policy 2025</li> <li>- Responsible Sourcing and Manufacturing Policy</li> </ul>
Classification	Audience: internal, external Access: internal, external

**ABOUT THIS STATEMENT**

This statement is prepared annually on a consolidated basis. It covers the **“Swarovski Crystal Business” (SCB), which includes the Swarovski International Holding AG and its controlled subsidiaries** (manufacturing sites, offices, retail stores). Entities listed in Annex I that report locally are consulted on the content of this group-level document and contains respective attestations of approval.

It is made in accordance with *the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act) 2023, the California Transparency in Supply Chains Act 2010, the UK Modern Slavery Act (UK MSA) 2015, the Australian Modern Slavery Act (Australian MSA) 2018, the Swiss Ordinance on Due Diligence & Transparency (DDTrO) 2022<sup>1</sup>, among others.*

It outlines how Swarovski has continued to strengthen its risk-based human rights due-diligence approach during the **2025 financial year (ending 31 December 2025)** to identify, prevent, mitigate, and address actual and potential risks of **modern slavery, including forced labour, human trafficking, and child labour**, across our own operations and throughout our global value chain, in line with the six-step guidance from the Organization for Economic Cooperation and Development (OECD) and other applicable frameworks.

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<sup>1</sup> Art. 964j-k of the Swiss Code of Obligations and the Swiss Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labour: (1) we performed our annual analysis, which confirmed that undertakings of the SCB did not import any conflict minerals and metals into Switzerland in calendar year 2025. (2) through our company-wide Sustainability Due Diligence (SDD) Swarovski as a group embedded the six-step framework of the OECD Due Diligence Guidance for Responsible business. The human rights (salience) assessment identified child labour as a salient human rights issue for upstream (external suppliers). Between 1 January and 31 December 2025, we have identified no reasonable suspicion of the existence of child labor within our supply chain. We closely monitor the topic of child labour at all our suppliers and continue to work to prevent and address this risk across our supply chain. Relevant public disclosures are contained in Swarovski’s annual Sustainability Report.

## **INTRODUCTION**

At Swarovski Crystal Business (SCB) we uphold human rights across our entire value chain, guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Our responsibility covers all internationally recognized human rights, including those set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the United Nations Women’s Empowerment Principles and the principles set out in the conventions of the International Labour Organization. In addition, we are signatories to the United Nations Global Compact (UNGC) and provide annual updates on our progress.

We are fully committed to respecting and promoting human rights across all parts of our chain of activities. This includes our own workforce, workers in the value chain, and stakeholders downstream of our operations. Our approach is rooted in transparency, vigilance, and continuous improvement.

At SCB, we recognize the global challenge of modern slavery, forced and child labour that comes in many forms and its adverse impacts on affected stakeholders, conduct thorough due diligence, and take concerted action to prevent and reduce related risks. We work closely with our suppliers to ensure they adhere to the same high ethical standards and comply with all relevant laws and regulations.

## **BUSINESS ACTIVITIES AND STRUCTURE**

SCB is a vertically integrated global business that designs, manufactures, and markets high-quality crystals, created stones, and finished products for businesses and consumers alike. SCB is headquartered in Zurich, Switzerland. SCB’s entities in Australia, Canada, UK, and the USA sell company’s products in respective local markets. Global compliance, legal, procurement, sustainability, and other functions support and policies apply to our local entities worldwide.

Swarovski operates a complex global supply chain that spans the sourcing of raw materials, goods, and services. Swarovski manages procurement, production planning, logistics, and inventory management across multiple regions, supported by a global supply chain organization focused on efficiency, quality, and innovation as well as responsible sourcing where particular focus is made on supplier transparency, risk assessment, including audits, and management, and supplier engagement.

*Read more in our annual sustainability report: Accounting Approach, ESRS disclosures.*

## **SUSTAINABILITY DUE DILIGENCE GOVERNANCE**

Our company-wide SDD approach governs environmental and human rights management across all our activities. It provides for accountability through clearly defined roles and responsibilities around impact identification, assessment, and control. The setup ensures cross-functional integration and oversight with bimonthly operational and quarterly steering group meetings and reports to our executive management.

The Swarovski SDD approach broadly involves three ‘lines of defense’.

- As a first line of defense, the operationalization and execution of due diligence measures in the respective business areas require strong ownership from the business functions across ‘Create, Make, Sell’.

- The second line of defense consists of support functions that deliver critical expert knowledge, required to help guide, manage and monitor. Our teams in Legal and Sustainability lead the overall steering of the SDD project across SCB and are guiding certain sub streams of the 6-step due diligence process (e.g. Compliance leading the creation of policies, Sustainability guiding impact / risk assessments, sustainability disclosures; among others).
- The third line of defense consists of the support by Internal Audit to advise, validate and test risk mitigation activities and reporting.

*Read more in our annual sustainability report, Sustainability Governance.*

## **POLICIES AND SYSTEMS, INCLUDING TRAINING AND CAPACITY-BUILDING**

Our organization and business partners are required to comply with applicable laws and regulations. They also adhere to applicable SCB's policies and guidelines.

In 2024, SCB further strengthened and harmonized its company-wide approach and governance for sustainability due diligence (SDD) that governs environmental and human rights management in our chain of activities. The objective is to roll out one SDD framework across the SCB, in line with the 6-step OECD Guidance and other applicable frameworks. It ensures cross-functional integration and oversight with monthly operational and bimonthly steering group meetings and report to the executive management and the board. Initial priority focus is on external suppliers and our own manufacturing sites.

Overall executive-level accountability for the SDD rests with our Chief Legal and Compliance Officer, who is a member of SCB's Executive Committee. A cross-functional team involving Procurement, Sustainability, Legal, Manufacturing, among others, is responsible for the functional implementation of the respective programmes of work in upstream and own operations.

In 2024, SCB also adopted its inaugural Corporate [Code of Conduct](#). SCB also updated its [Supplier Code of Conduct](#), expanding applicability scope to include all sub suppliers and subcontractors. Our suppliers are required to uphold human rights, ensure fair and safe labor conditions, and maintain ethical business conduct across their entire supply chain. Any form of forced or compulsory labor is strictly prohibited and will not be tolerated. A written acknowledgement of this Supplier Code of Conduct from each supplier is mandatory. Grievance Speak Up channel was launched for internal as well as external stakeholders, including suppliers, to report any actual or potential issues. It is aligned with the UNGPs 29-31. The [Speak Up Policy](#) and the [Speak Up Channel Privacy Policy](#) define core principles that should be adhered to when receiving and investigating reports.

Furthermore, in 2024 SCB adopted and approved its [Responsible Sourcing & Manufacturing Policy](#) that stipulates our commitment to social and environmental standards, with particular emphasis on the topics that are material to our business. Such topics include modern slavery, forced and child labour, health and safety, working conditions, equal opportunities and non-discrimination, and environmental protection.

The mandatory regular Code of Conduct trainings for the entire workforce were launched in 2024. They cover the issues of modern slavery, forced and child labour. Initial capacity-building for internal stakeholders was also supported through the UNGC Business and Human Rights Accelerator. Starting from 2024, focal points in HR and other functions across the organization

are regularly sensitized on the issues of modern slavery, forced and child labour, among other human rights issues salient for the business.

In 2025, we delivered targeted training to the entire Procurement organization, with particular focus on modern slavery, forced and child labour. We also engaged suppliers to ensure their adherence to the Supplier Code of Conduct, including modern slavery, forced and child labour, and conducted focused capacity-building sessions with particular focus on effective establishment of an operational grievance channel.

## **RISK MANAGEMENT AND DUE DILIGENCE**

SCB follows a risk-based approach in respecting and promoting human rights across our entire chain of activities, including own operations and suppliers. We conduct periodic impact assessments to evaluate and prioritise adverse impacts on people arising across the entire value chain, which includes modern slavery, forced and child labour.

Our annual high-level risk scan allows us to systematically identify, assess, and address salient issues in our supply chain and own operations based on geographical, economic activity, and product-related risks. For this, until 2024 we employed Sedex radar and in 2025 moved to an automated inherent risk assessment tool, which incorporates risk scores for modern slavery, forced and child labour at the country level.

Additionally, in 2024 we conducted our first human rights saliency assessment, at group level as well as at several own manufacturing sites. This cross-functional risk saliency followed the UNGP's principles in assessing severity (scope, scale, remediability) and likelihood. For our own operations we concluded that forced labour and child labour risks were low and will periodically reassess through regular sustainability audits, such as SMETA. For supply chain, forced labour and child labour<sup>2</sup> are salient human rights issues.

From 2025, we use automated risk assessment tool's score in combination with our internal classification of procurement category risk to screen suppliers to actively manage high- and medium-risk ones as part of our **Responsible Sourcing Initiative (RSI)** that was established in 2014. Suppliers identified as high-risk are subject to periodic third-party onsite audits against internationally recognized standards, such as Sedex Members Ethical Trade Audit (SMETA), Social Accountability International's SA8000, and amfori BSCI, where modern slavery, forced and child labour risks are assessed through documents reviews, confidential worker interviews, site observations and management interviews during onsite audit.

In 2025, we completed 140 supplier audits, representing a 15% increase compared to 2024. This number included 110 social audits, finding, on average, 5 non-conformances per audit. We also conducted 30 environmental audits, averaging 13 non-conformances per audit. For all the non-conformances identified, we worked with suppliers to address and resolve the issues within the given time frame. None of the identified non-conformances pertained to modern slavery, forced and child labour. These activities are complemented by enhanced supplier onboarding requirements, strengthened contractual prohibitions on forced and prison labor, and escalation mechanisms where risks are identified.

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<sup>2</sup> See Annex 2 for detailed definitions that SCB operates under its sustainability due diligence

Audits of internal and external production facilities were also routinely reviewed by independent third parties to ensure that Swarovski's standards regarding modern slavery, forced and child labour were upheld and adhered to.

Our Speak Up channel also had no reports related to modern slavery, forced and child labour in the value chain in the reporting period.

Onboarding of automated risk assessment tool further enabled our **Supply Chain Transparency Program** which started since 2021 to systematically collect upstream supplier information beyond our tier 1 partners. It helps us monitor human rights for tier 1 (finished goods), tier 2 (components) and up to tier 3 (raw materials) suppliers, increasing visibility along each tier, enhancing transparency, and supporting sustainability-related engagement of suppliers. By mapping deeper tiers of our supply chain, the program strengthens our understanding of material origins, production workflows, and the entities involved in key manufacturing stages. This enhanced visibility also enables us to identify and monitor any outsourced production activities that occur beyond the primary supplier level, ensuring greater oversight and accountability across our supply network.

*Read more in our annual sustainability report: sections Human Rights; Source.*

### **ASSESSMENT ON EFFECTIVENESS, INCLUDING REMEDIATION**

Evaluating the effectiveness of our modern slavery, forced and child labour prevention efforts is critical to ensuring our approach remains robust and responsive. We focus on targeted metrics that reflect our ability to identify, mitigate, and respond to these risks across our operations and supply chains:

- Audit findings related to modern slavery, forced and child labour: % of supplier audits (SMETA or internal) that identify non-compliances related to modern slavery, forced and child labour, or unethical recruitment practices;
- Corrective action closure rate for modern slavery, forced and child labour issues: Proportion of modern slavery, forced and child labour-related audit findings resolved within the agreed timeframe;
- Grievance mechanism utilization: # of modern slavery, forced and child labour -related concerns reported through formal channels, and related timely resolution rate.

Efforts to prevent and reduce risks of forced labour and child labour can have the unintended consequence of contributing to a loss of income for vulnerable families. Where such unintended impacts occur, we will seek to implement or support appropriate measures to remediate loss of income for affected vulnerable families that results from steps taken to eliminate forced labour or child labour risks in SCB's activities and throughout our supply chain. We have established an ILO-aligned child labour remediation procedure within our internal RSI guidelines, ensuring both corrective and preventive measures are in place.

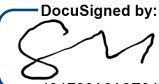
No cases of loss of income resulting from SCB's efforts to eliminate forced labour or child labour risks have been identified in the reporting period and therefore no remediation measures taken.

### **COMMUNICATION AND DISCLOSURE**

SCB's annual sustainability report, in 2025 partially aligned to the European Sustainability Reporting Standards (ESRS), provides a transparent platform to disclose our efforts to identify, prevent, and address human rights issues, including modern slavery, forced and child labour. It

is an externally facing communications channel that fosters accountability, informs stakeholders, and demonstrates our commitment to ethical practices and compliance.

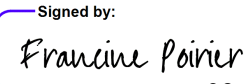
Additionally, we maintain ongoing, proactive dialogue with our stakeholders, including affected rightsholders. Our main stakeholder groups include own workforce, supply chain workforce, consumers, as well as local communities. Additionally to engaging suppliers through RSI, in 2025 in Thailand we organized a rightsholder engagement with a statistically representative group of employees to gather insights on salient human rights issues and plan follow up actions. *Read more in our annual sustainability report: sections Human Rights; Stakeholder Engagement.*


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Dr. Stephan Mechnig 11-Mar-2026 | 10:39 CET

Chief Legal and Compliance Officer, SCB

*'In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.'*

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Edward J. Capobianco 09-Mar-2026 | 15:39 CET  
Director, Swarovski Canada Limited  
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Francine Poirier 09-Mar-2026 | 16:01 CET  
Director, Swarovski Canada Limited  
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Brett Spinks 09-Mar-2026 | 23:55 CET  
Director, Swarovski Australia Pty Ltd.  
Signature and date

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Samantha Winstanley 11-Mar-2026 | 10:36 CET  
Director, Swarovski UK Limited  
Signature and date

## ANNEX 1

SCB includes the following entities with relevant reporting obligations.

### Swarovski Canada Ltd.

#### **Organizational structure**

Swarovski Canada Limited (hereinafter “Swarovski Canada”) is a private corporation, founded in 1976. It is owned by Swarovski International Holding AG (hereinafter, “Swarovski Holding” or “parent”), a Swiss company with its roots in Austria that designs, manufactures and sells crystals, Swarovski Created Diamonds, jewelry, watches, figures, decoration and accessories products, to businesses and consumers across the globe. The Board of Directors of Swarovski Holding has ultimate oversight over Swarovski Canada’s strategy and implementation, supply chain and forced labour and child labour initiatives. Swarovski Holding also owns Swarovski Aktiengesellschaft (hereinafter, “Swarovski AG” or an “affiliate”), based in the Principality of Liechtenstein. Swarovski Canada’s supply chain is sourced through this affiliate company.

#### **Activities**

Swarovski Canada does not produce any goods in Canada. Swarovski Canada imports Swarovski Created Diamonds, jewelry, watches, figures, decoration and accessories products into Canada, to be sold online and in retail stores. In 2024 Swarovski Canada owned and operated more than 50 stores throughout the country.

#### **Supply Chain**

Swarovski Canada’s supply chain is sourced solely through its affiliate, Swarovski AG. Swarovski Canada relies upon the many measures that Swarovski Holding and its affiliates have in place to monitor both internal and external suppliers.

The products that Swarovski Canada imports and sells are manufactured outside of Canada, either in one of Swarovski Holding’s six production sites based in Austria, Serbia, India, Thailand and Vietnam, or in third-party manufacturing facilities around the globe.

### Swarovski UK Ltd.

#### **Organizational structure**

Swarovski UK Limited (hereinafter “Swarovski UK”) is a private limited company, founded in 1965. It is owned by Swarovski International Holding AG (hereinafter, “Swarovski Holding” or “parent”), a Swiss company with its roots in Austria. Both are part of the Swarovski group of companies that designs, manufactures and sells crystals, Swarovski Created Diamonds, jewelry, watches, figures, decorations and accessories to businesses and consumers across the globe. The Board of Directors of Swarovski Holding has ultimate oversight over Swarovski UK strategy and implementation, supply chain and forced labour and child labour initiatives.

#### **Activities**

Swarovski UK does not produce goods in the UK. Swarovski UK imports Swarovski Created Diamonds, jewelry, watches, figures, decoration and accessories products into UK, to be sold online and in retail stores.

#### **Supply Chain**

Swarovski UK relies upon the many measures that Swarovski Holding and its affiliates have in place to monitor both internal and external suppliers.

The products that Swarovski UK imports and sells are mainly manufactured outside of UK, either in one of Swarovski group six production sites based in Austria, Serbia, India, Thailand and Vietnam, or in third-party manufacturing facilities around the globe.

## ANNEX 2

SCB operates the following definitions of human rights issues as part of our Sustainability Due Diligence (people focus) and saliency assessments:

**Forced labour** refers to coercing individuals to work against their will through threats, violence, or deception. It deprives individuals of their freedom and dignity, often involving exploitation, abuse, and severe restrictions on movement and autonomy, violating fundamental human rights and international labour standards. Related concepts are compulsory/ bonded/ involuntary labour (under menace or threat of penalty), freedom of movement, **human trafficking**, **(modern) slavery**, exploitation, harsh/inhumane treatment. In line with the CSDD, it relates to the prohibition of forced or compulsory labour, which means all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily, for example as a result of debt bondage or trafficking in human beings, interpreted in line with Article 2(1) of the International Labour Organization Forced Labour Convention, 1930 (No 29). Forced or compulsory labour shall not mean any work or services that comply with Article 2(2) of the International Labour Organization Forced Labour Convention, 1930 (No 29) or with Article 8(3), points (b) and (c) of the International Covenant on Civil and Political Rights. The prohibition of all forms of slavery and slave-trade, including practices akin to slavery, serfdom or other forms of domination or oppression in the workplace, such as extreme economic or sexual exploitation and humiliation, or human trafficking, interpreted in line with Article 8 of the International Covenant on Civil and Political Rights.

**Child labour** in line with CSDDD, it refers to the prohibition of the employment of a child under the age at which compulsory schooling is completed and, in any case, is not less than 15 years, except where the law of the place of employment so provides in line with Article 2(4) of the International Labour Organization Minimum Age Convention, 1973 (No 138), interpreted in line with Articles 4 to 8 of the International Labour Organization Minimum Age Convention, 1973 (No 138). The prohibition of the worst forms of child labour (persons below the age of 18 years), interpreted in line with Article 3 of the International Labour Organization Worst Forms of Child Labour Convention, 1999 (No 182). This Includes:

- (a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom, as well as forced or compulsory labour, including the forced or compulsory recruitment of children for use in armed conflicts;
- (b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- (c) the use, procuring or offering of a child for illicit activities, in particular for the production or trafficking of drugs;
- (d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children

**Conflict Minerals – Swarovski 2024 (human rights) saliency assessment defined Conflict Minerals as ‘responsible sourcing and trade of raw materials / minerals, particularly those mined in in conflict-affected or high-risk areas (CAHRAs) where profits fuel armed conflict and human rights abuses. Includes tantalum, tin, tungsten, gold (3TG), also cobalt, and mica. It emphasizes the right of individuals and communities in these regions to live free from violence and exploitation associated with mineral extraction, processing, and trade. This right entails ensuring that mining operations respect human rights, uphold labor standards, and do not contribute to armed conflict, forced labor, or child labor. It also advocates for transparency in supply chains, responsible sourcing practices, and efforts to support sustainable development and peace-building initiatives in affected regions.’** Saliency of the issue was confirmed for the upstream (external) suppliers.

Under the EU and the Swiss regulations, tin, tantalum, tungsten, and gold include their ores, concentrates, and metals. Swarovski mainly uses tungsten (Wolfram) and gold as inputs that enable manufacturing (Wolfram-containing products) or finishing (gold as a metal) of its products.