

Speak Up Policy

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SWAROVSKI

Swarovski is committed to a work environment characterized by respect, inclusivity and the highest level of integrity. If you observe conduct that you believe might violate applicable laws and regulations or Swarovski's Code of Conduct or any of our policies and regulations, please speak up. Speaking up in good faith is a fundamental responsibility that will help foster a culture of integrity and a positive and respectful work environment. We will investigate suspected noncompliance and take corrective actions whenever necessary. We do not accept any form of retaliation against those who speak up in good faith.

1. Speaking Up - Who, When and How

Who can speak up?

Our Speak Up Channel is available to employees and external parties who suspect misconduct within Swarovski.

When should you speak up?

As soon as you suspect a case of noncompliance.

How should you speak up?

If possible, address the situation directly with the person whom you suspect of wrongdoing. Otherwise, reach out to your line manager, to HR or to Legal and Compliance. As a last resort, i.e., if you do not feel comfortable to speak up openly, you may use the **Swarovski Speak Up Channel** and report your concern anonymously. The Speak Up Channel is operated by an independent service provider and is available 24/7 in multiple languages. For the Speak Up Channel contact details, as well as further information, please visit the Swarovski website or the Swarovski Intranet Sites.

Whereas we strongly encourage you to address your concern directly to Swarovski, you are legally entitled to contact relevant external authorities.

2. Speaking Up - About What

You may raise concerns regarding any conduct that you believe might violate applicable laws and regulations or Swarovski's Code of Conduct or any of Swarovski's binding policies and regulations.

Examples of concerns that you *should raise*:

- Suspicions of bribery, corruption, asset misappropriation, or inadequate financial or non-financial recordkeeping.
- Human rights violations.
- Violations of competition law.
- Money laundering or breaches of trade sanctions.
- Disclosure of confidential business information.
- (Sexual) harassment, mobbing, bullying or discrimination.
- Infringement of data protection regulations.
- Violations of environmental, health and safety regulations.
- Concerns relating to alcohol or drug misuse.
- Retaliation against anyone for speaking up in good faith.

The Speak Up Channel *must not* be used to:

- Report routine personnel employment issues (e.g., errors relating to vacation days, salary and benefits, performance appraisals); please contact your line manager or HR instead.
- Settle personal or legal disputes.

3. Our Commitments

- All reports of alleged misconduct will be handled confidentially and in accordance with applicable data privacy laws. Moreover, reports filed through the Speak Up channel will remain anonymous.
- While we condemn any form of retaliation against those who report in good faith, we will not tolerate false accusations that were made against better judgement.
- Strict confidentiality to the extent possible throughout the process will protect you as the complainant and the accused individual.
- If you report a case of suspected non-compliance, you can count on Swarovski to protect you from any form of retaliation, provided of course the report was filed in good faith.
- Anyone subject to an accusation will in due time get the chance to be heard and any investigation will be carried out based on the presumption of innocence.
- Once you have filed a report, you will receive a note of acknowledgement within 7 days and feedback on the outcome of the case no later than 3 months.
- We take your complaint seriously, conduct any necessary investigation timely and thoroughly and take corrective actions as necessary while sanctioning noncompliant behavior appropriately.

The Speak Up Approach as outlined in this Policy is endorsed by the Executive Committee and the Board of Directors. The Chief Legal and Compliance Officer is accountable for its operational execution, while the overall implementation of the Policy including the protection of the employees' rights and adherence to the commitments outlined above is monitored by the Ethics & Compliance Committee (consisting of the Chief HR Officer, Chief Legal and Compliance Officer, the Chief Financial Officer and the Board Office). Regular executive summaries regarding non-compliance reports, findings and, if applicable, sanctions, will be approved by the Ethics & Compliance Committee and, on an anonymous basis, shared with the CEO, the Board of Directors, the Finance & Audit Committee and the Risk & Control Committee.