

Code of Conduct



SWAROVSKI



MESSAGE FROM THE BOARD OF DIRECTORS AND EXECUTIVE MANAGEMENT

As we continue to thrive as a company, it is imperative that we reaffirm our unwavering commitment to the purpose and values that have defined Swarovski since its foundation in 1895.

Our Code of Conduct celebrates our heritage while setting forth the behavioral expectations for all company employees irrespective of their role, level or location as well as for any external individuals, whether they are directly or indirectly engaged with Swarovski. The Code is not merely a set of rules; it is a testimony of our dedication to fostering a work environment characterized by respect, inclusivity, and the highest level of integrity.

We kindly ask you to take time to familiarize yourself with all aspects of our Code of Conduct. It is a reference for creating an engaging work environment, growing a purposeful business, and acting responsibly towards our employees, our customers, our suppliers, our communities, and the environment.

The adherence to our Code of Conduct is a shared commitment. If you witness behavior that is not in line with this Code of Conduct, do not hesitate to speak up.

Reports of misconduct are taken seriously, investigated properly, and if necessary, followed with suitable corrective actions.

Thank you for sharing our commitment to our Code of Conduct. We shall all be proud to continue building a company that stands firmly on its principles.

Luisa Deplazes de Andrade Delgado
Chair Board of Directors

Alexis Nasard
CEO

CONTENT



All Facets of our Responsibility



Integrity in the Workplace



A Trusted Business Partner



Owning Your Part



Speak Up



The Essence of Who we Are

We are the Masters of Light and we offer customers joy by igniting their dreams with beautiful products and a unique journey through luxury. We give people the guts to celebrate their individuality. We are a design-led, customer-inspired, and culturally relevant company, with a unique savoir-faire in the creation of beautiful products. We are an active and positive player in society, through our cultural activities and social awareness.

Crystal Mastery

We shape, cut, refine, and apply crystals and beyond like no other company - since 1895 - leading to an assortment of refined complications with impeccable quality, that brings to life the joyful extravagance of our products.

Cultural Relevance

With our rich heritage and deep market and customer understanding, we are a cultural icon with a unique positioning in the world of jewelry, design, fashion, stage and screen, and create products that make dreams come true.

Global Presence

Our fully vertically integrated business model and our global presence allow us to understand trends and developments early on, balance business across geographies, and remain globally relevant.



Integrity in the Workplace

Diversity and Inclusion

Fair Employment Practices

A Safe and Healthy Working Environment

Protecting Company Assets

Communication and Social Media

Confidentiality and Information Security

Diversity and Inclusion

As a company we value differences and strive to attract, hire, and retain a workforce that reflects, represents, and connects with the globally diverse market and customers we serve.

Our work environment is designed to ensure that employees are treated and treat each other fairly and respectfully. There is no room for physical, verbal, sexual or any other form of harassment.

We provide equitable opportunities in employment and give qualified individuals the opportunity to grow and reach their full potential.

All employment decisions are based exclusively on merit, qualifications, and performance.



Fair Employment Practices

We respect, protect, and promote fundamental human rights, comply with international proclaimed human rights standards and national labor laws. We do not tolerate any instances of child labor or any form of forced labor.

We believe in fair and performance-based remuneration, which is reflected in our global remuneration policy and a transparent performance assessment process.

We support active career progression through dedicated capability building and job rotation opportunities.

We respect the right of employees to join trade unions or engage in other forms of employee representation in accordance with local law.



A Safe and Healthy Working Environment

Our people are our most valuable assets. We will safeguard their health and safety. Our policies and procedures reflect this commitment and are designed to provide a work environment that is free not only from work-related hazards, but also from physical, verbal, and sexual harassment.

In turn, we expect all employees to respect this maxim and refrain from any behavior that could jeopardize the above. For instance, it is strictly forbidden to work under the influence of alcohol, illegal drugs or controlled substances.



Protecting Company Assets

We all share the responsibility to protect the assets of the Company, which include not only physical assets but also intellectual property, as well as technology and data.

All physical assets, e.g., machinery, tools, IT equipment, retail fixtures, product samples, and inventory, shall be treated with care, protected from theft, loss, damage, and misuse. Any disposal of physical assets must follow the company approved procedures.

We protect Swarovski Intellectual Property, which includes all trademarks, logos, designs, know-how, inventions, patents, and trade secrets. When using any of these assets, we must respect and comply with all applicable laws and internal regulations and guidelines. All Intellectual Property that is created in the course of your work or by using company means, such as inventions, artwork, designs, or software, belong to Swarovski.

Company technology and all data generated by using such technology are meant to be used solely for business purposes, need to be safeguarded from damage, theft, fraud, and unauthorized access, and must never be used for illegal or unethical activities.



Communication and Social Media

Transparent and truthful communication, not only internally but also with external parties is crucial for maintaining the reputation, credibility, and relationships of Swarovski.

All communications, irrespective of the medium, must be accurate and honest. Any form of misrepresentation or false information about the Company, its products, services, or stakeholders can have severe repercussions and must be avoided. Therefore, only designated individuals, such as official spokespersons, are authorized to communicate with the media, investors, regulatory bodies, and other external stakeholders. Everyone else must direct media inquiries or requests for official statements to the appropriate channels.

Whenever you use social media and identify yourself as an employee or otherwise referring to Swarovski, please consider yourself an ambassador of Swarovski, and in any case make sure you adhere to company guidelines on the appropriate use of social media.

SWAROVSKI



Confidentiality and Information Security

We value and protect our confidential information and we respect the confidential information of others.

Confidential information consists of any information that is not or not yet public information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, databases, records, salary information, and any non-published financial or other data. Swarovski's continued success depends on the use of its confidential information and its nondisclosure to third parties. Unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment.

Furthermore, employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information. Swarovski respects that third parties have a similar interest in protecting their confidential information. Whenever third parties, such as joint venture partners, suppliers or customers, share with us confidential information, such information shall be treated with the same care as if it was our confidential information. In that same spirit, employees shall protect confidential information they have obtained in the course of their prior employment.





A Trusted Business Partner

Sustainability

Product Safety and Quality

Fair Business Conduct

Sustainability (1/2)

A responsible relationship with people and the planet is part of Swarovski's heritage and our way of doing business, and guides the relationship with our employees, customers, and suppliers, as well as the communities in which we operate. Today, this legacy is rooted in sustainability measures across our value chain, with an emphasis on 'circularity & waste,' 'climate,' 'conscious materials,' 'equity, diversity & inclusion' as well as 'human rights'.

We perform due diligence checks in our business operations and value chain to identify, prevent, and mitigate negative human and environmental impacts. We regularly report our efforts, progress, and achievements in fostering sustainable practices across our business operations. This reflects our dedication to accountability, transparency, continuous improvement, and responsible business conduct.

The Swarovski Foundation complements our sustainability activities through charitable contributions to address social, environmental, and humanitarian challenges.



Sustainability (2/2)

To minimize our impact on the world around us, we continuously analyze **our environmental footprint** and innovate throughout our supply chain and product ranges to minimize waste, foster circularity, reduce resource use, and lower greenhouse gas emissions. Our employees strive to protect resources and ensure that their activities protect the environment as much as possible. This applies when choosing suppliers, materials or external services: the consideration of ecological, ethical, and social criteria is taken into account, in addition to economic aspects.

Respect for **human rights** and human dignity is a core value of our business. It is our corporate responsibility not to engage in activities that directly or indirectly violate human rights throughout our organization, potentially affected groups, and other relevant stakeholders. Additionally, we expect all stakeholders, including business partners, vendors and suppliers, to be aligned in upholding human rights globally. Our approach to human rights is based on the United Nations Guiding Principles on Business and Human Rights.

This covers areas such as forced labor and human trafficking, health and safety, equity, diversity and inclusion, child labor, employee rights, fair labor practices, and ethical business conduct.



Product Safety and Quality

Our commitment to product safety and quality is unwavering, and we adhere to high standards in design, manufacturing, and distribution. We ensure impeccable quality of our products and apply rigorous safety standards in line with applicable laws.

We work diligently to assess, test, and monitor our products throughout their lifecycle to guarantee their safety, quality, and reliability. We are dedicated to products that are safe for customers and the environment.

In the unlikely event of a product safety or quality concern, we take immediate action to investigate, address, and rectify the issue.

SWAROVSKI



Fair Business Conduct (1/3)

Compliance with applicable laws and regulations is non-negotiable for us. Business interests can never justify any behavior that is against the law. Even if there is no specific law, we never engage in unfair, deceptive or misleading practices. We will always put the interests of our customers at the forefront of our actions, respect their privacy rights and refrain from false or misleading claims, while upholding our dedication to delivering exceptional products.

Fairness and compliance is our guiding principle also in relation to our **suppliers**. While we enable suppliers to compete equitably for our business based on objective criteria such as quality, cost, and capacity as described in our purchasing procedures, we ensure that they live up to the same standards that we do, through our Supplier Code and by conducting periodical compliance audits.

We believe in the importance of **free and fair competition** based on merits only. We are prepared to compete successfully in today's business environment and will always do so in full compliance with all applicable antitrust, competition, and fair dealing laws. Therefore, we will not engage in any discussions, agreements, or actions that could lead to collusion, price-fixing, bid-rigging, market allocation, or any other anticompetitive behavior.



Fair Business Conduct (2/3)

While **competitive intelligence** is crucial, we are committed to respect the confidential information and intellectual property rights of our competitors and gather data only from publicly available sources.

We are committed to protecting the privacy and confidentiality of the data we handle, whether it belongs to our employees, customers, suppliers, or any other stakeholder. We adhere to applicable **data protection** laws and regulations to ensure that personal data is collected and processed lawfully and fairly and deleted when no longer needed.

We avoid using data and technology in ways that are unethical or could lead to discrimination, exploitation, or harm. We are committed to the ethical use of **artificial intelligence** based on the principles of transparency, diversity, non-discrimination and fairness, privacy and security, environmental and social wellbeing, accountability, and technical robustness.

We will always act in the best interests of Swarovski. A **conflict of interest** occurs when personal interests of an employee or the interests of a third party compete with the interests of Swarovski. In such a situation, it can be difficult for the employee to act fully in the best interests of Swarovski. Employees shall avoid conflicts of interest whenever possible. If a conflict-of-interest situation has occurred or if an employee faces a situation that may involve or lead to a conflict of interest, the employee shall speak up in order to resolve the situation in a fair and transparent manner.



Fair Business Conduct (3/3)

We comply with applicable **trade regulations** and follow government-imposed **trade restrictions**.

We condemn any form of **bribery and corruption**. Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment from a third party. Moreover, employees must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct or the attempt thereof. Employees should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.

We will help prevent **money laundering** by conducting business with reputable partners and for legitimate business purposes only, while relying on appropriate due diligence processes.

Swarovski's financial records are the basis for managing the Company's business and fulfilling its obligations to various stakeholders. Therefore, any **financial record** must be accurate, compliant with all applicable laws, and in line with generally accepted accounting standards.





Owning Your Part

The Code and You

The Code and You

The Swarovski Code of Conduct, rooted in the Company's principles, establishes certain non-negotiable minimum standards of behavior in key areas. It applies to all employees worldwide. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. Employees should seek guidance when they are in doubt about the proper course of action in a situation, as it is the ultimate responsibility of each employee to "do the right thing," a responsibility that cannot be delegated.

Whereas the Code of Conduct is binding for Swarovski employees directly, we expect our external stakeholders to respect and comply with the Code of Conduct and consider such commitment one important precondition for having any professional relationship or collaboration with Swarovski.

Any failure to comply with this Code may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

SWAROVSKI





Speaking Up

Speaking up in good faith when you have concerns is a fundamental responsibility that contributes to our shared commitment to foster a culture of and maintain a positive and respectful work environment. The Company values the courage and integrity of employees who come forward with concerns, and we assure you that these individuals will be safeguarded from any form of retaliation. Whether you are addressing your own concerns or those of a colleague, here are recommended steps to address situations that do not align with the principles and values of Swarovski.

Direct Communication

If you feel comfortable, address the situation directly to the person that is suspected to have done something wrong.

Seeking Support

Should you be reluctant to address the concern directly, reach out to your manager, HR or Legal and Compliance partner.

Speak Up Channel

If speaking up openly does not feel right and you prefer to speak up anonymously, you can make use of the Swarovski Speak up Channel.

Using the Speak Up Channel

The company Speak Up Channel provides a secure and confidential platform to raise concerns, report violations, and contribute to a culture of integrity. Some information that could be valuable for you to know:

- All reports of alleged misconduct can be made anonymously via the Speak Up Channel, in line with data privacy principles, except for legally required disclosures to authorities/government agencies. All reports of misconduct are taken seriously, investigated as promptly as possible, properly and followed with suitable corrective actions.
- We ensure that employees reporting in good faith will not face retaliation and will be shielded from company repercussions. However, submitting reports in bad faith may result in legal action or disciplinary measures.
- Maintaining a safe and respectful environment requires the active involvement of each of us. By raising concerns, you contribute to our collective effort to uphold our values and the Code of Conduct.

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.





Thank You

Embracing our Code of Conduct and legitimately speaking up reinforces the integrity of our business and work environment.