

Bijou Brigitte modische Accessoires AG

Policy statement on our human rights strategy

December 2023

A. Introduction

Bijou Brigitte modische Accessoires AG (hereinafter referred to as “Bijou Brigitte”) is committed to protecting human rights and protecting the environment. It is the declared goal of the management of Bijou Brigitte to respect, protect and promote human rights and the environment along the company’s entire value chain. Violations of internationally established human rights and national and international environmental protection regulations will not be tolerated.

Bijou Brigitte has committed itself to complying with the following international regulatory frameworks, which provide the basis for our due diligence obligations in the areas of human rights and environmental protection:

- The International Bill of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- The UN Global Compact
- The OECD Guidelines for Multinational Enterprises
- The core labour standards of the International Labour Organization (ILO)
- The United Nations Convention on the Rights of the Child

Bijou Brigitte complies with all applicable laws domestically and internationally and acts in accordance with international human rights standards.

The principles laid down in this policy related to the human rights and environmental strategy of Bijou Brigitte apply throughout the entirety of Bijou Brigitte AG. Management and employees are required to comply with these

principles in the performance of their assigned tasks. Bijou Brigitte expects all of its business partners to adhere to their human rights

and environmental obligations. Respecting and upholding human rights and environmental obligations is a fundamental prerequisite for working with Bijou Brigitte.

B. Bijou Brigitte

Bijou Brigitte is one of the leading European fashion jewellery chains. The business activity of Bijou Brigitte AG is based on a regionally aligned network of stores and locations. All major steps along the value chain, as well as its supporting processes, are centrally managed at our corporate headquarters in Hamburg. The procurement and sale of jewellery and accessories make up the core business of Bijou Brigitte.

C. The German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz)

The purpose of the German Supply Chain Due Diligence Act (LkSG) is to ensure that human rights and environmental standards are met along the entire supply chain. It defines a range of protected legal positions and an extensive set of due diligence obligations for companies in order to prevent violations.

According to Section 6 (2) LkSG, every company within the scope of the LkSG is required to provide a policy statement on its human rights strategy. This policy statement must cover the procedures which the company uses to ensure compliance with its due diligence obligations within its own business operations and throughout the supply chain. Each company is also required to perform a risk analysis and specify the human rights and environmental risks which it has identified as a priority. The statement must also define what the company expects from its employees and the suppliers in its supply chain when it comes to human rights and environment.

D. Respect for human rights and the environment at every stage of the supply chain

Bijou Brigitte takes appropriate and effective measures to identify, verify, and prevent risks related to human rights and the environment within its own business operations and throughout the supply chain. If it is determined that a human rights or environmental obligation has been or is about to be

violated, a targeted remediation process is implemented. This process involves taking specific measures designed to bring a violation to an end and minimise its consequences.

All of the measures implemented as part of our human rights and environmental responsibilities follow the principle of “engagement before disengagement”. We are committed to helping our business partners to prevent and end violations of human rights or environmental regulations before severing our business relationships with them or switching to alternative suppliers.

1. **Human rights and environmental expectations**

We expect our employees, business partners, and suppliers to comply with the following protected legal positions:

- **Prohibition of child labour and child forced labour:** child labour as defined by ILO Conventions No. 138 and No. 182 is prohibited.
- **Prohibition of slavery, bonded labour, forced labour, and slavery-like practices:** All forms of slavery, forced labour, bonded labour, and slavery-like practices are prohibited. We observe ILO conventions no. 29 (including its protocol) and no. 105.
- **Compliance with basic occupational safety regulations:** We take appropriate measures to protect the health of our workforce and ensure their safety. These measures include the free provision of suitable protective clothing, training in the use of work equipment (e.g. machines), and regular checks to ensure compliance with occupational safety regulations.
- **Working hours and rest periods:** We adhere to legal regulations regarding working hours and rest periods. We take appropriate measures to monitor compliance with regulations regarding working hours and rest periods.
- **Freedom of association, freedom of assembly, right to strike:** Employees have the right, in accordance with ILO Convention No. 98, to form or join a workers’ organisation for the purpose of

collective bargaining. In situations where a country's laws imposes restrictions on the freedom of association, employees are granted the right to form alternative representative bodies to conduct collective bargaining.

- **Prohibition of discrimination:** Discrimination based on national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion, or belief is prohibited unless it can be objectively justified. Wage discrimination is also prohibited.
- **Fair wages:** All employees are paid at least the legal minimum wage. In countries where the law does not provide for a legal minimum wage, employees receive a fair wage.
- **Harmful changes to soil, water pollution, air pollution, harmful noise emissions and excessive water consumption:** Our business activities do not cause harmful changes to soil, water pollution, air pollution or excessive water consumption that affect people's livelihoods, access to drinking water or sanitation, or the health of individuals. National noise regulations are observed.
- **Prohibition of illegal eviction and protection of business projects:** The prohibition of illegal eviction and the unlawful seizure of land, forests, and bodies of water is observed whenever land, forests and bodies of water are acquired, developed or used for other purposes. We do not delegate security responsibilities for business projects to public or private security forces if their deployment would result in human rights violations due to lack of training or oversight.
- **Mercury and persistent organic pollutants:** We act in accordance with the regulations on the prohibition and use of products containing mercury laid down in the Minamata Convention on Mercury at all times. The production and use of persistent organic pollutants is prohibited in accordance with the Stockholm Convention on Persistent Organic Pollutants.
- **Hazardous waste:** Waste is handled, collected, stored, and disposed of in accordance with applicable national environmental pro-

tection legislation. Hazardous waste is imported and exported in accordance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

- **Conflict minerals:** All raw materials and products used must be free from conflict minerals within the meaning of Regulation (EU) 2017/821 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2. Measures to ensure effective risk management

Bijou Brigitte exercises due diligence in its dealings with direct suppliers in order to protect the aforementioned legal positions in the supply chain. We expect our business partners to exercise due diligence and ensure that operators further down the supply chain exercise due diligence when it comes to human rights and the environment.

- (i) Bijou Brigitte uses a risk management system to exercise due diligence, both within in its own business operations and throughout the entirety of its supply chain. Through the horizontal and vertical integration of due diligence in all relevant business processes, Bijou Brigitte ensures that risks are identified and targeted preventive and remedial measures are implemented.

2.1 Effective risk management and effectiveness checks

The risk management system establishes the processes which Bijou Brigitte uses to exercise due diligence and defines areas of responsibility, competencies, and reporting lines.

Within Bijou Brigitte's horizontal due diligence framework, all relevant departments – Internal Audit, Imports, Sustainability, Quality Management, Procurement, Legal and IT – are involved in the implementation process as a single project group. The project group is headed up by Internal Audit and is responsible for the operational management of due diligence implementation. It coordinates due diligence procedures, defines priorities, and leads Bijou Brigitte's efforts to protect human rights and meet its environmental obligations. The senior executives of Bijou Brigitte are provided with training on the LkSG and its implementation. An FAQ has been provided to clear up

any questions employees may have about the LkSG. This FAQ is available to all employees.

Bijou Brigitte's vertical due diligence framework is implemented in the form of supervisory and coordination responsibilities at the management level. The Management Board is ultimately responsible for the implementation of due diligence in the areas of human rights and the environment.

Bijou Brigitte has assigned responsibility for overseeing risk management to Internal Audit, as the head of the project group. The Head of Internal Audit is the point of contact for the Management Board in all matters related to the LkSG and reports directly to the Management Board. The Head of Internal Audit oversees risk management for both Bijou Brigitte's own business operations and its entire supply chain. They also perform regular effectiveness checks in cooperation with the departments that make up the project group.

2.2 Identifying, assessing, and prioritising risks

Bijou Brigitte performs comprehensive risk analyses regarding compliance with human rights and environmental obligations, both within its own business operations and on the part of its direct suppliers. Bijou Brigitte draws on both internal and external expertise to perform these risk analyses. Due to the complexity and scope of our international supply chain, we use of technical solutions to help us identify, verify, assess and prioritise risks.

Our risk analysis system allows us to determine the human rights and environmental risks to which each of our business partners is exposed. An abstract risk analysis is performed based on numerous recognised indices, studies by external experts and general information about our suppliers – particularly information about the country of origin. The factors incorporated into our risk analysis include the official indices of the following organisations:

the International Labour Organization, the KidsRights Foundation, the United Nations, Walk Free, the World Justice Project, Development Finance International, Oxfam, The Heritage Foundation, McCall MacBain Foundation, the Center for International Earth Science Information Network, the Yale Center for Environment Law & Policy and the International Trade Union Confederation.

The analysis based on the indices of these organisations is updated twice a year. As part of the update process, Bijou Brigitte checks whether new regulations/conventions have come into force and whether new indices need to be included.

We then draw on self-assessments by suppliers, certificates, insights from audits and information from our whistleblowing system to assess business partners for specific human rights or environmental risks. In addition to the country of origin and the industries our business partners operate in, we pay particularly attention to product risks – particularly their environmental aspects – and a wide variety of other data (e.g. CSR reports) so that we can narrow down, locate, and identify risks at an early stage.

We assess and prioritise risks by comparing the typically expected severity of a potential legal violation and its irreversibility against how likely it is to occur. We also factor in the extent to which we are able to prioritise risks and take targeted action when there is a significant possibility of a risk materialising. We have defined five risk levels (1 = no risk, 5 = very high risk). We have defined measures for each risk category so that preventive and remedial measures can be initiated where they are needed.

2.3 Preventive measures

Our comprehensive risk analyses are supplemented by appropriate and effective preventive measures.

Our business operations are subject to an internal code of conduct which clearly summarises the rights of employees and what is expected of them. Our policy statement is available to the public on our website.

Bijou Brigitte provides training for its employees. Employees entrusted with implementing human rights and environmental due diligence participate in training on a regular basis to ensure that they are capable of implementing international human rights and environmental protection requirements throughout the supply chain. We offer training opportunities to our business partners to support them in their efforts to uphold human rights and protect the environment within their business operations.

We conduct regular and ad-hoc inspections within our business operations to identify and minimise risks at an early stage.

We provide all business partners classified as risk level 5 with a questionnaire for them to complete. We audit business partners and conduct spot checks of questionnaires. All audits and spot checks are carried out by an independent auditor. We also accept only recognised audits, such as BSCI and SMETA audits.

We require our suppliers of goods for sale to ensure that our human rights and environmental expectations are applied to the rest of their supply chains and to monitor compliance on an ongoing basis. Our BB SCoC (Supplier Code of Conduct) provides the framework for all new business relationships.

2.4 Remedial measures

Effective remedial measures must be taken whenever a human rights or environmental obligation is violated or such a violation is imminent.

Bijou Brigitte initiates remedial measures as soon as violations are identified. We develop tailored remedial measures for each situation and each direct supplier which are designed to bring violations to an end. We have also developed a modular series of framework measures that we can activate immediately while adding all of the relevant information in response to violations.

We define a process, aims, and clear internal responsibilities for each remedial measure. Each remedial measure has a detailed timeline. Interim milestones can also be defined for each measure.

2.5 Following up on reports

An effective whistleblowing system plays a crucial role in identifying risks and violations in the supply chain. This system is accessible to all of the parties involved in the supply chain – from employees to suppliers to third parties who may be affected by our or our suppliers' activities. It is vitally important that all reports can be submitted confidentially.

Our web-based whistleblowing system is multilingual and reflects the complexity of our supply chain. Any barriers to access are set low to make submitting reports as easy as possible.

Reports are handled confidentially and promptly. Employees involved in handling reports are not subject to instructions within the complaint management framework to maintain their neutrality. Each report triggers an evaluation and action process, at the end of which the reported violation is resolved or a recognised risk is minimised. Each report is reviewed by the responsible employees upon receipt. Once the facts of the matter have been clarified, a targeted solution is developed. If it is deemed appropriate, the person who submitted the report may be involved in this process. Any remedial measures which we implement are assessed to determine how effective they have been. We regularly review the effectiveness of the system as a whole.

We assess submitted reports and complaints within our risk analysis framework.

2.6 Responsibility throughout the supply chain

Bijou Brigitte takes its responsibility for the entire supply chain very seriously. Because of this, we extend our risk analysis process to include suppliers who, while not in direct business relationships with us, are part of our supply chain. We work closely together with our direct business partners to perform ad hoc risk analyses of indirect suppliers. This cooperative approach increases transparency in the supply chain for the benefit of all.

2.7 Documentation and reporting

We document the implementation of all due diligence measures on an ongoing basis. We record all available information about identified risks and the preventive and remedial measures we take in our risk analysis tool.

We are committed to communicating transparently about the human rights and environmental challenges that Bijou Brigitte faces. Through our public reporting, we provide information about identified risks, measures we have taken, and the progress we have achieved at least once a year.

3. Focus on human rights and the environment

Our corporate due diligence begins with the timely identification of potential industry-specific and country-specific human rights violations and environmental risks. We assess the likelihood of human rights violations, the potential severity of their impact, how probable it is that they can be prevented by Bijou Brigitte, and how effective any preventive measures are likely to be.

We have identified the following industry-specific and country-specific risks:

high risk of corruption, lack of freedom of association, inadequate working conditions, lack of contracts, no regulated working hours, forced labour, child labour, occupational health and safety, water consumption and water availability.

We respond to these identified specific risks in our supply chain with the tiered measures described above. We prioritise areas where Bijou Brigitte can exert the most influence and where the impact on people is greatest.

E. Outlook

We are committed to continuously reviewing and improving the measures we implement at Bijou Brigitte. We take action to ensure that all of our human rights and environmental due diligence is effective. We perform effectiveness reviews at least once a year and more frequently when needed.



[Marc Gabriel (Compliance / Finance Director)]