

**Modern Slavery Statement /
California Transparency in Supply Chains Act /
Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act**
for the financial year ending February 3, 2024

Claire's Stores, Inc. (collectively with its subsidiaries and affiliates¹ "Claire's") is a global fashion brand committed to inspiring self-expression through the creation and delivery of jewelry and fashion accessories. We operate stores under two brand names: Claire's® and Icing®.

The California Transparency in Supply Chains Act of 2010 (SB 657), the United Kingdom Modern Slavery Act of 2015 and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2024 (S-211) require businesses like ours to provide disclosures concerning their efforts to address the issues of slavery, child labor and human trafficking in their supply chains and within their business. We take this responsibility seriously. This statement sets out our commitment and the actions taken during the previous fiscal year to combat slavery, child labor and human trafficking within our business and in our supply chain, and was approved by the board of directors of Claire's Stores, Inc.

The standards that we set for our company and our employees are set forth in [Claire's Code of Business Conduct and Ethics](#), which requires employees to act with integrity, to observe the form and spirit of laws and governmental rules and regulations and to adhere to a high standard of business ethics. Our code explicitly requires adherence with all laws, rules and regulations, including, without limitation, those pertaining to labor, worker health and safety, slavery and human trafficking. Failure of employees to comply with our Code of Business Conduct and Ethics can result in corrective action that may include termination of employment.

In addition to our Code of Business Conduct and Ethics, we require our vendors to respect and follow applicable laws and regulations to promote ethical decisions and legal compliance in all aspects of their business. Our expectations and requirements are set forth in our Vendor Compliance Policy, which all of our vendors must sign as a condition of doing business with us. The Vendor Compliance Policy includes the [Vendor Standards](#), which explicitly prohibit forced, involuntary or child labor of any kind and which work to ensure that our products are made in safe and humane working conditions. The Vendor Standards include strict requirements on minimum worker ages, compliance with applicable local legal requirements for young workers and retention of documentation verifying worker's date of birth.

We verify our product supply chain through factory visits to measure compliance with our requirements. The Vendor Standards state that "factories will allow Claire's and/or any of its representatives or agents unrestricted access to its facilities and to all relevant records at all times, whether or not notice is provided in advance, to implement and monitor said standards."

¹ Our subsidiaries organized in the UK include Claire's Accessories UK Limited (which manages the operation of our UK stores), Claire's European Distribution Limited (the purchasing/distribution arm of our European operations) and Claire's European Services Limited (the corporate/management arm of our European operations). For the purposes of the Canada Fighting Against Forced Labor and Child Labour in Supply Chains Act the subsidiaries covered by this statement include Claire's Stores Canada Corp (which manages the operation of our Canadian stores) and Claire's Canada Corp (the parent company of Claire's Stores Canada Corp which is organized in Delaware, USA and holds the majority of the Canadian assets).

Audits are conducted by a third party. For any vendor that fails or refuses to comply with the Vendor Standards, we may (i) immediately cancel any and all outstanding orders with such vendor, (ii) refuse or return any shipment from such vendor, and (iii) cease doing business with any such vendor.

Claire's trains employees who have direct responsibility for supply chain management, such as merchandise buyers, on the risks of child labor, slavery and human trafficking and ways to mitigate those risks specific to our supply chain.

We encourage our employees, directors, and officers to report any issues or concerns about potential ethics, human rights, legal, or regulatory violations, including any improper or unethical business practices.

The above processes and policies are reviewed and updated on a regular basis to ensure that they are appropriate to our business and that they remain effective.

We have not identified any forced labor or child labor in our activities and supply chains in the last financial year and therefore no remediation measures have been taken, including remediation of loss of income for vulnerable families that might result from measures taken to remediate forced labor or child labor in our activities and supply chain.



Ryan Vero
Board Director and CEO

Attestation for the purposes of the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2024 (S-211) (the "Act")

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.

Full name: Ryan Vero
Title: Board Director and CEO
Date: May 9, 2024
Signature:



I have the authority to bind Claire's Stores, Inc.