

PANDORA RESPONSIBLE SUPPLIER POLICY

PANDORA is committed “to promote responsible business practices from the sourcing of gemstones, precious metals and other materials to the crafting and marketing of our jewellery”. The majority of ethical dilemmas facing the jewellery industry are associated with the initial activities in the supply chain such as mining, mineral trading and stone cutting processes. Present policy shall ensure a uniform approach to handling ethical dilemmas in our supply chain.

For questions regarding this Responsible Supplier Policy please contact Group CSR, +45 3673 8234

PANDORA wish to maintain and further develop a systematic, transparent and business integrated approach to handling ethical challenges in our supply chain. We will clearly define and communicate our expectations to our suppliers, provide relevant training, initiate third party CSR audits and instruct our suppliers to implement corrective actions as needed. Finally, we will proactively take a leading role in initiatives that seek to advance the CSR performance of our industry.

PANDORA will work to advance the ethical performance of our supply chain by ensuring that suppliers comply with PANDORA's **Supplier's Code of Conduct**. We do this through our **four step CSR Supplier Programme** that instructs us to:

- Integrate CSR risks in our regular business assessments of existing and potential suppliers by utilising our **CSR Screening and Categorising Tools**
- Initiate proportional actions to different supplier categories ranging from requests from signing our **Supplier's Code of Conduct, CSR trainings, CSR self-assessments** to **independent third party audits**.
- Engage in open dialogue with suppliers on all identified non-compliances.
- Follow up - and provide reasonable assistance - on agreed **corrective action plans** that balance the nature of the **non-compliances** with the time needed for our suppliers to ensure compliance.
- Take up a leading role in joint efforts such as the **Responsible Jewellery Council** to build responsible supply chains within the jewellery supply chain.
- Engage in dialogue and strategic partnerships with stakeholders in order to continuously raise the CSR knowledge and performance of our suppliers.
- Purchasers must observe and comply with our four step CSR Supplier Programme and when in doubt request guidance from direct manager or CSR.

Whenever national law differs from this Responsible Supplier Policy you must adhere to the stricter of the two. If you perceive that current policy is being violated you are expected to raise your concern with management. If such a concern is not properly addressed by your manager you can approach local/Group HR, CSR or as a last resort use the **whistleblower function**.