PANDORA GLOBAL ENVIRONMENTAL POLICY

VERSION 2.0

DOCUMENT OVERVIEW

EFFECTIVE DATE	05 December 2024
DEPARTMENT OWNERSHIP	Global Sustainability
CONTENT ENQUIRIES	sustainability@pandora.net
BOARD OF DIRECTORS APPROVAL	05 December 2024
RELATED DOCUMENTS	Pandora Code of Conduct Supplier Code of Conduct Responsible Sourcing Policy Global Material Standard Responsible Marketing Standard

Classification: Pandora Internal

1 OBJECTIVE

Pandora recognises the importance of protecting the environment and is committed to conducting its business in full compliance with all environmental laws and standards set out in this Policy.

This Policy is intended to create awareness of environmental rules and ensure that Pandora's management, employees and partners have a broad and basic understanding hereof and how these rules affect our company and our brand.

2 SCOPE

Our commitment to protecting the environment applies to Pandora's own operations and value chain worldwide. We expect all employees, suppliers and other third parties including franchisees to uphold the values and commitment outlined in this Policy and assist Pandora in its efforts to protect the environment.

In the event of discrepancies between this English version of the Policy and any local translations thereof, the English version shall prevail. Additionally, in the event of discrepancies between this Policy and any local corresponding legislation or addendums, the stricter requirement shall apply.

3 ROLES AND RESPONSIBILITIES

While all Pandora employees are expected to exhibit environmental thoughtfulness and sound practices in daily operations, oversight and responsibility of the Environmental Policy rests with Pandora's Senior Vice President of Sustainability, with our Global Sustainability team and relevant business functional leads and teams leading the day-to-day implementation of our environmental commitments.

The Policy is overseen by Pandora's Sustainability Board (SB), comprising senior leaders, including representatives from the ELT. The SB reviews and addresses emerging environmental issues and progress on key strategic environmental topics and is responsible for integrating sustainability into business decisions within their respective functions.

Pandora's BoD, which approved this policy, oversees the company's sustainability efforts, including environmental issues, and receives updates at least once a year.

Sustainability risks, including potential environmental risks, are reported to the Global Risk & Insurance Office, that supports the Risk Management Board to report identified key risks to Executive

Management, our Audit Committee and the BoD. Pandora's BoD is ultimately responsible for the implementation of effective risk identification, assessment and mitigation.

The Low Carbon and Nature Taskforce oversees key emission reduction and nature-preserving initiatives, including the assessment of key impacts. The Responsible Sourcing Committee oversees the implementation of Pandora's Responsible Sourcing Programme. Both are led by Global Sustainability and include representatives from senior management.

Employees are required to observe and act in compliance with this Policy and if in doubt, consult with the relevant manager or the Global Sustainability team at sustainability@pandora.net.

4 GENERAL COMMITMENTS

Pandora has taken measures to meet or exceed legal and regulatory requirements on environmental protection and Pandora Code of Conduct. Where applicable, Pandora is required and committed to adhere to any additional minimum standards of environmental protection based on the applicable local laws and regulations. Adherence to this Policy is fundamental to ensure that all subsidiaries and affiliates, regardless of geographic location, comply with applicable environmental legislation.

Every Employee is responsible for assisting Pandora in its efforts to comply with environmental laws and standards. Breaches of this Policy will not be tolerated and may lead to disciplinary action up to and including termination of employment.

5 POLICY STATEMENT

5.1 MATERIAL ENVIRONMENTAL MATTERS

As part of our ongoing environmental due diligence, our double materiality assessment guides our strategy and responds to growing stakeholder expectations and regulatory demands. Based on current insights, the following topics are deemed material or on a watchlist (see section 7 for definitions):

- Greenhouse gas emissions (scope 1, 2 and 3)
- Environmental impacts of raw materials, sourced goods and services
- Water in own operations
- Biodiversity
- Pollution

5.2 STAKEHOLDERS

To identify material environmental risks and target mitigation measures, we proactively and regularly engage with key stakeholders, such as investors, suppliers, civil society, governments, NGOs, customers and key partners.

5.3 IMPLEMENTATION

We recognise that environmental due diligence is a continuous process and we have policies, processes, training and monitoring systems in place to embed environmental considerations into relevant business decisions. This Policy commits Pandora to strive to lower its environmental impact through the following actions:

Risk management systems:

- Ensuring regular enterprise and value chain risk identification and reporting are performed to inform relevant management bodies and initiate mitigation processes.
- Ensuring compliance with applicable environmental legislation and internal policies and standards, including our Code of Conduct and Supplier Code of Conduct.
- Seeking to combine due diligence approaches to ensure environmental practices and management do not negatively impact people, workers in the value chain and communities.
- Adopting, maintaining and continuously improving internationally recognised environmental management systems, protocols and standards in our operations. For our crafting facilities, these include ISO 9001, ISO 14001, ISO 45001, ISO 50001, SMETA and Higg FEM.
- Obtaining Leadership in Energy and Environmental Design (LEED), or similar green building certification at our crafting facilities.

Targets and metrics:

- Defining internal targets and public goals based on the best available science including implementing the Science Based Targets initiative (SBTi), the Science Based Targets Network (SBTN), life-cycle assessments (LCAs), and other internationally recognised frameworks and methodologies.
- Ensuring targets and goals are set with clearly defined Key Performance Indicators (KPIs) supporting measurable progress and monitoring.
- Exploring and adopting end-to-end approaches to mitigate the environmental impacts of products and procured goods and services, from ideation to end-of-life.
- Ensuring that our raw materials and sourced goods and services leave the lowest possible negative environmental impact, guided by our Global Material Standard.

Reporting and communication:

- Maintaining transparent and substantiated reporting of environmental-related risks and performance progress against public targets in our Annual Report, corporate website and accounts, including the CDP, the Taskforce on Climate-Related Financial Disclosures (TCFD), the Taskforce on Nature-Related Financial Disclosures (TNFD), the United Nations Global Compact Communication (UNGC) on Progress, the Transparency in Supply Chains (TISC) statement and more.
- Providing legal, decent and honest information to all stakeholders, including ensuring qualifications are clear, prominent and readily understandable, as outlined in our Responsible Marketing Standard.

Engagement and monitoring:

- Engaging employees on the environmental agenda and ensuring relevant capacity building for employees and suppliers. This includes eLearning, on-site training and other activities.
- Defining the level of environmental requirements and expectations for all suppliers, franchisees and distributors in our Supplier Code of Conduct and Franchisee and Distributor Code of Conduct, and integrating these into agreements.
- Setting environmental criteria for key supplier selection and monitoring key suppliers through our Responsible Sourcing Programme.
- Engaging in industry initiatives to work in partnership to maximise impacts and disseminate best practice aiming to advance the environmental performance of our wider industry.

Pandora employees and partners who observe any violation of this Policy are expected to raise their concerns with their direct manager. If a concern is not properly addressed by a direct manager, there are multiple ways to raise a concern as outlined in the Whistleblower Policy. This includes a Whistleblower Hotline enabling all Pandora employees, suppliers, other third parties and external stakeholders to confidentially report any serious or sensitive concerns.

6 DEFINITIONS

KEYWORD	DEFINITION
Science Based Targets initiative (SBTi)	The SBTi provides a clearly defined pathway for companies to reduce emissions in line with the Paris Agreement goals.
Science Based Targets Network (SBTN)	The SBTN give companies a clear pathway to competitiveness and resilience by using science to define their role in protecting and restoring nature.
CDP	The CDP (formerly the Carbon Disclosure Project) runs the global environmental disclosure system supporting companies to measure and manage their environmental impact and risks.
Taskforce on Climate-Related Financial Disclosures (TCFD)	The TCFD provides a framework to help companies disclose climate-related risks and opportunities.
Taskforce on Nature-Related Financial Disclosures (TNFD)	The TNFD provides a framework to help companies assess, report and act on their nature-related risks and opportunities, including integrated climate-related disclosures.
Life-cycle assessment (LCA)	The LCA methodology analyses life-cycle inventory data to quantify the environmental impact of a product, process, or activity throughout its life-cycle stages.
United Nations Global Compact (UNGC) Communication on Progress	The UNGC Communication on Progress provides a framework to help companies measure, demonstrate and compare progress on the Ten Principles and the Sustainable Development Goals in a consistent and harmonised way.
Transparency in Supply Chains (TISC)	Our Transparency in Supply Chains Statement describes how we work to prevent forced labour, child labour, modern slavery and human trafficking in our supply chain.

7 DOCUMENT VERSION HISTORY

VERSION	DATE	AUTHOR	CHANGE DESCRIPTION
1.0	May 2021	Global Sustainability	• First Environmental Policy
1.1	November 2021	Global Sustainability	• Updated Ownership • Updated Roles & Responsibilities • Updated Implementation
2.0	November 2024	Global Sustainability	• Updated Roles & Responsibilities • Updated Policy Statement, including: Material Issues Policy commitment Key Stakeholders Implementation