

Modern Slavery Statement – Fiscal Year 2023/2024

1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps THOMAS SABO GmbH & Co. KG has taken during the past financial year to prevent modern slavery and human trafficking in our supply chain and business operations.

2. Company Structure, Business and Supply Chain

THOMAS SABO GmbH & Co. KG is a international company specializing in the design, manufacture, and distribution of high-quality jewellery and watches operating in over 70 countries. Our supply chain includes vendors from Germany and EU countries, Thailand and China.

3. Policies and Commitments

We are committed to promoting ethical and sustainable business practices. Our policies to combat modern slavery includes:

- Supplier Code of Conduct
- Supply Chain Policy
- Commitment of the THOMAS SABO Group to responsible business practices

4. Due Diligence Processes, Risk Assessment and Mitigation

We implement due diligence processes to identify and mitigate potential risks of modern slavery in our supply chain, including:

- Assessing supplier risks based on geographic location, industry and business relationships
- Regular supplier reviews
- Collaboration with suppliers to improve working conditions

5. Effectiveness of Measures

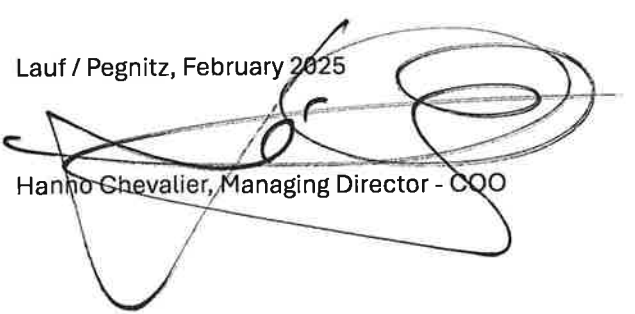
We measure the effectiveness of our actions through:

- Number of supplier visits conducted
- Number of incidents identified and resolved
- Feedback from employees and suppliers

6. Approval

This statement was approved by the board and will be reviewed annually.

Lauf / Pegnitz, February 2025


Hanno Chevalier, Managing Director - COO