

Anti-Slavery and Human Trafficking Statement

Claire's Stores, Inc. and its subsidiaries and affiliates (collectively, "Claire's"), are one of the world's leading specialty retailers of fashionable jewelry and accessories for young women, teens, tweens and girls ages 3 to 35. We operate stores under two brand names: Claire's® and Icing®. As of January 28, 2017, we operated 2,710 stores in 17 countries throughout North America and Europe, excluding 933 concession store locations. We also franchised 603 stores in 27 countries primarily located in the Middle East, Central and Southeast Asia and Central and South America, and Southern Africa.

The California Transparency in Supply Chains Act of 2010 (SB 657) and the United Kingdom Modern Slavery Act of 2015 require businesses like ours to provide disclosures concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains and within their business. We take this responsibility very seriously. This statement has been approved by our Board of Directors and sets out our commitment and the actions taken during the previous fiscal year to combat slavery and human trafficking within our business and in our supply chain.

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 expect 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 state that forced or involuntary labor of any kind is strictly prohibited, and which work to ensure that our products are made in safe and humane working conditions.

We verify our product supply chain through factory visits to measure compliance with our requirements. The Vendor Standards state that "factories will allow CBI 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." Audits are conducted by a third party. For any vendor who 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.

All employees who have direct responsibility for supply chain management, such as merchandise buyers, through periodic training, are made aware of the risks of slavery and human trafficking and are trained on ways to mitigate those risks specific to our supply chain. Claire's also participates in industry working groups such as the Retail Industry Leaders Association and the Fashion Jewelry and Accessories Trade Association to improve the quality of products and transparency in the 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.



Ron Marshall
Chief Executive Officer