



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

The present statement relates to the financial year ending **December 31, 2025** and is made by BIC UK in compliance with the UK Modern Slavery Act 2015.

The following describes its actions to identify, prevent, monitor and mitigate all potential human rights risks related to its business and the steps taken to combat modern slavery and human trafficking in its own operations and supply chains.

Guided by its values, BIC UK is committed to operate with the strongest ethical standards and principles. BIC UK expects all its business partners to conduct their business with the same high standards.

1. BIC's ORGANISATION

BIC UK conducts business in the distribution of consumer products. BIC UK is part of BIC group ("BIC"), and its ultimate parent company is *Société BIC*.

For more than 75 years, BIC has met consumer needs with high-quality, safe, affordable and essential products. BIC is a world leader in consumer goods, offering products from various categories: Stationery, Lighters, Shavers and Skin Creative¹. On December 11th, 2024, this portfolio expanded to personal grooming products with the acquisition of Tangle Teezer², a premium detangling haircare company, headquartered in the United Kingdom.

BIC's products are available to consumers in more than 160 countries. It operates through 20 manufacturing sites, which are organized by consumer business category, and located in Europe (France, Spain, Greece), the rest in North America (U.S, Canada), Latin America (Mexico, Brazil), Africa (Tunisia, South Africa, Kenya, Nigeria) and Asia (China, India³).

Over 95% of products sold are manufactured in BIC factories, thus, reliance on contract manufacturing is low. BIC recognizes that controlling its value chain is a source of opportunities to promote its values, a culture of quality control and production management.

2. BIC's GOVERNANCE & POLICIES

BIC is member of the United Nations Global Compact and is committed to upholding its principles, including those relating to human rights and labor standards. This commitment reinforces BIC's efforts to identify, prevent, and address any risks of modern slavery or any type of human trafficking in its operations and supply chain.

BIC has drawn up a series of policies which apply to all employees, officers, directors of all BIC entities and factories. The ones that specifically address the areas related to human rights include the following:

¹ On December 4, 2025, BIC announced the discontinuation of Skin Creative activities (semi-permanent tattoos).

² Tangle Teezer has published a separate Modern Slavery Act Statement for 2025.

³ On October 28, 2025, BIC announced the sale of BIC Cello (India) Pvt. Ltd and the divestiture of its Cello activities in India.



BIC Code of Conduct, revised in 2023, reflects BIC's commitment to conducting its business ethically and in accordance with all relevant laws, regulations and industry standards. This Code also provides information on key areas of business activity, such as human rights and fundamental freedoms, and outlines the responsibilities of every BIC employee.

BIC expects all its business partners to comply with the Code of Conduct and reserves the right to immediately terminate its business relationship with any contract manufacturer or supplier who does not comply with it.

BIC Supplier Code of Conduct, released in 2020, outlines BIC's commitments and expectations with respect to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain.

BIC's suppliers and subcontractors are required to adhere to the following principles, amongst others:

- A safe and healthy working environment
- Fair wages and reasonable working hours
- Prohibition of child labor
- Prohibition of forced labor
- Non-discrimination
- Prohibition of abusive working practices and harassment
- Freedom of association and collective bargaining
- Legal compliance
- Environmental responsibility

BIC Group Responsible Sourcing policy, released in 2024 and revised in 2025, strengthens BIC's sustainable sourcing approach and sets expectations for its business partners in multiple areas, including business integrity, health and safety, human rights and labor rights, environmental impacts.

Product Safety Statement reinforces BIC's commitment to develop and manufacture products that are safe for human health and the environment, in line with applicable safety regulations.

Health & Safety policy, released in 2025 and replacing the former Environment, Health & Safety (EH&S) Policy codifies the Group's commitment to protecting people and fostering a proactive safety culture.

Speak Up policy, released in 2024, outlines the process and safeguards for raising concerns. BIC employees and third parties are encouraged to report suspected human rights' incidents or concerns through multiple channels, including the BIC Speak Up Line.

A **Sustainability Council**, chaired by the Group Sustainability Officer, was established in 2025 and is tasked with embedding the sustainability strategy, including the Human Rights pillar, across the organization, ensuring alignment across functions. It is composed of representatives from key departments including Legal & Compliance, Strategy, Procurement, Manufacturing, HR, Quality, HSSE, Commercial, Finance and Communications.

3. RISK ASSESSMENT

In the spirit of continuous improvement, BIC regularly reviews its risk mappings to refine its understanding of actual and potential risks and ensure that effective mitigation measures are in place. BIC relies on international standards and industry best practices to assess potential human rights risks.



For instance, in accordance with the French Duty of Vigilance Law, BIC carries on a risk mapping to identify, analyze and prioritize major risks related to human rights and fundamental freedoms (including modern slavery or human trafficking), health and safety as well as environment. In 2025, BIC undertook a revision of its Vigilance risk mapping, with the support of external experts.

In addition, in 2025, the Company conducted a Double Materiality Assessment under the Corporate Sustainability Reporting Directive ("CSRD"), the outcomes of which inform the identification and prioritization of social and human rights risks.

As a global consumer products manufacturer, BIC recognizes that certain of its activities and jurisdictions in which it operates present greater potential risks related to the non-respect of fundamental human rights. These risks include potential non-compliance with working conditions, discrimination, child labor, or forced labor.

For further information, please refer to **BIC's Sustainability Statement** and **Vigilance Plan**, which are included in **BIC's Universal Registration Document for 2025**.

4. DUE DILIGENCE PROCESSES AND MONITORING

BIC has taken a series of measures to assess, mitigate and monitor human rights related risks within its operation and its supply chain. High-risk activities are assessed based on a combination of parameters and risk factors, such as country/location, sector and industry, workforce vulnerability, supply chain complexity, categories of suppliers, business relationships, etc.

In 2024, the Procurement team led a cross-functional initiative aiming at providing a holistic framework for the management of procurement-related risks (ESG, Finance and Business Ethics). BIC will continue to conduct risk-based due diligence reviews and implement additional remedial measures for identified high-risk suppliers. The due diligence program also leverages automated tools and third-party providers to assess and monitor social and human rights across the value chain.

In addition, suppliers are required to accept and abide by contractual provisions addressing compliance with a range of ethical standards, including human rights requirements.

BIC has also implemented a social audit program to ensure compliance with its Code of Conduct in factories where BIC® products are manufactured, covering global and local contract manufacturers. Regular on-site audits are conducted, following a risk-based approach, to verify that standards are maintained at a satisfactory level. Audits are carried out by third-party auditors via the Workplace Conditions Assessment ("WCA") platform. This assessment tool is based on international human rights principles and national laws, incorporating International Labor Organization ("ILO") standards and best practices. The WCA comprises over 180 evaluation criteria, including the following topics: child labor; forced labor; discrimination; harassment; freedom of association; working hours; salaries; employment contracts; health and safety; and environmental responsibility.

All contract manufacturers producing BIC® products are audited over a two-year cycle, during which improvement programs are implemented based on deficiencies identified during the assessment.

5. BIC GRIEVANCE MECHANISM

The company-wide program, "BIC Speak Up" encourages employees to report any potential violation of the Code of Conduct and related policies through different channels, including an



anonymous and confidential reporting hotline operated by a third-party service provider. In 2024, this hotline was also made accessible to external parties, including workers in BIC's value chain. This hotline is accessible by telephone and Internet in more than 200 languages.

In 2025, the BIC Speak Up program, including tools, policies and procedures, was reviewed and upgraded to strengthen its efficiency.

BIC is committed to maintaining a zero-tolerance policy on retaliation against anyone who reports suspected breaches in good faith.

6. TRAINING & AWARENESS

BIC provides targeted awareness trainings to employees and business partners to foster a culture in which human rights are understood and respected.

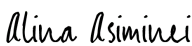
All employees in all locations are invited to complete an online Code of Conduct training in the company's learning management system as part of their induction. The Code of Conduct is made available and distributed to all new employees as part of the onboarding process. It is available in multiple languages on the BIC Intranet, as well as the website.

In addition, in 2025, BIC rolled out a focused campaign of live trainings to all factory-based employees that includes specific content on human rights and working conditions with real-life examples relating to them.

BIC believes that collaboration with suppliers and other external stakeholders is essential to preventing and addressing modern slavery risks. BIC works with its suppliers to support their efforts to meet the standards set out in its Supplier Code of Conduct. In this regard, the Procurement teams have taken steps to strengthen suppliers' engagement and awareness. For instance, in 2025, webinars with selected suppliers were organized, aiming at reinforcing BIC's standards and expectations.

BIC will continue to enhance its global risk assessment model through a cross-functional approach throughout the organization and its value chain.

This statement was approved by the Board of Directors of BIC UK dated August 6, 2026.

Signed by:


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Alina Asiminei on behalf of BIC UK
October 5, 2026