

## **Introduction**

This statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act"). It sets out the steps that have been taken by or on behalf of Crocs Europe B.V., and its parent and subsidiaries, in the fiscal year 2023 to ensure that modern slavery and human trafficking is not taking place in its business and supply chain.

The steps Crocs has taken in 2023 to prevent modern slavery and human trafficking serve as a reinforcement of our long-standing policy of conducting business with partners (including but not limited to agents, vendors, manufacturers, factories suppliers and subcontractors) who share the same values and high ethical standards as we do.

## **Business**

Crocs is a world leader in innovative casual footwear for men, women and children. Crocs offers a broad portfolio of all-season products, while remaining true to its core molded footwear heritage. Since its inception in 2002, Crocs has sold more than 700 million pairs of shoes in more than 90 countries around the world. Crocs sells its products in three channels: (i) wholesale, (ii) retail; and (iii) e-commerce.

## **Company Structure**

Crocs, Inc. (NASDAQ: CROX) is the ultimate parent of all Crocs group of companies and is located in Broomfield, Colorado U.S.A. Crocs Europe B.V. located in The Netherlands is the European subsidiary of Crocs, Inc. Crocs Europe B.V. has a direct 100% interest in a number of European subsidiaries including Crocs UK Limited.

## **Supply Chain**

We purchase our raw materials and goods from third party suppliers located worldwide. Crocs products are manufactured in third party factories in Argentina, Bosnia-Herzegovina, Brazil, China, Indonesia, Mexico, India and Vietnam.

## **Crocs' Policies**

Crocs' *Worldwide Code of Ethics* and its *Social Compliance Code of Conduct*<sup>1</sup> (collectively, "Codes") reaffirm our commitment to conducting ethical business by observing local labor standards and internationally recognized human rights standards throughout our supply chain. All employees are governed by the Codes. Additionally, Crocs has a whistleblower hotline (called the "Ethics Line") for our employees and third parties with whom we partner to use if they find themselves in a situation which may lead to a violation of the Crocs' Codes or applicable laws or regulations. It is the responsibility of all Crocs employees to follow the Codes and to report issues. Crocs will promptly review any report and will not tolerate threats or acts of retaliation against any person for reporting a concern.

## **Due Diligence Process for Slavery and Human Trafficking**

We evaluate potential contracted factories against our rigorous standards and require them to agree to Crocs' terms of engagement prior to entering our supply chain. By doing so, these factories are also bound by our

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<sup>1</sup> To be found at <https://investors.crocs.com/governance/governance-documents/default.aspx>.

Codes. Combined, these documents provide clear guidance on our expectations and address topics such as child and forced labor, wages, hours, discrimination and harassment-free workplaces.

Crocs will not knowingly work with factories that use forced labor and utilize an independent external resource and an internal monitoring team to conduct unannounced periodic social compliance audits of our business partners' factories to evaluate and address risks pertaining to slavery and human trafficking in accordance with Crocs' Social Compliance Code of Conduct. Crocs also conducts unannounced audits to ensure compliance with labor and employment requirements contained in third party licensing agreements. Additionally, Crocs' social compliance team is responsible for actively monitoring and assessing our business partners' factories. Any failure of employees or business partners to abide by either the Worldwide Code of Ethics or Social Compliance Code of Conduct will result in corrective action or termination of employment or contract.

### **Assessing and Managing Risk of Modern Slavery and Human Trafficking**

The issue of where potential slavery and human trafficking risks may lie in our supply chain and operations, and how Crocs assesses and manages those risks, are addressed through our due diligence and audit processes. Our terms of engagement make it clear that factories must conduct business in full compliance with all applicable laws, rules and regulations and comply with our Codes.

In 2023, Crocs audited 27 out of 27 third party factories it sources products and materials from, including China ( 13), Vietnam ( 7), Indonesia ( 2), Mexico (1), India (1), Brazil (1), Argentina (1), and Bosnia (1). Internal audits were performed at most factories during the course of the year and at least one external audit (through 3<sup>rd</sup> parties such as Intertek, Elevate, etc.) were also conducted at majority of these factories. All audits were performed against the industry standard such as SMETA, BSCI and Crocs' Social Compliance Code of Conduct,

### **Effectiveness of Program**

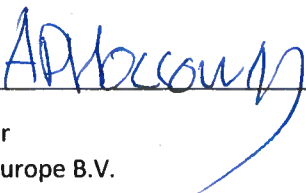
Of the factories audited in 2023, no acts of modern slavery or human trafficking were identified.

### **Training**

Crocs employees are required to complete on-line training on our Worldwide Code of Ethics during their first 30 days of employment, and on a yearly basis thereafter, and sign an agreement to abide by its principles. We also have a broad social compliance-training program in place that covers the topics of human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products. Crocs also continued to provide compliance training to its suppliers in 2023.

This statement has been approved by the Board of Directors of Crocs Europe B.V.

**Adrian Holloway**

  
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