

HIGHLIGHTS

In the following pages we have provided information about corporate governance policies and practices at Claire's Holdings LLC, parent company of Claire's Stores, Inc.

OFFICERS AND MANAGERS

We function under a corporate structure that includes a Board of Managers and Officers of the corporation. A list of our Officers can be found at Senior Management under the [Company Overview](#).

CODE OF BUSINESS CONDUCT

Our Managers, corporate officers and employees have always understood and been committed to the concepts of integrity and accountability. All employees are subject to our Code of Business Conduct, posted here as well.

Code of Business Conduct & Ethics

[code of business](#)

[conduct & ethics](#)

EMPLOYEE COMPLAINT PROCEDURES FOR ACCOUNTING AND AUDITING MATTERS

The Board of Managers of Claire's has implemented procedures enabling employees to make confidential, anonymous reports relating to potentially questionable accounting or auditing practices. Submissions can be made in writing in such a manner that they are transmitted unopened to the Board of Managers, through e-mail or through a confidential, independently administered hotline, which then routes the matter directly to the company's General Counsel.

THE PHONE NUMBERS FOR SUBMITTING REPORTS RELATING TO ACCOUNTING OR AUDITING PRACTICES ARE:

TELEPHONE

From the US, Canada & Puerto Rico: 855.692.6031

From Europe & Japan: 703.797.1766

E-MAIL

legal@claires.com

POSTAL ADDRESS

Legal Department
2400 West Central Road
Hoffman Estates, IL 60192

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[FORM 8937 - REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES - 2020](#)