



BRUNELLO CUCINELLI

MODERN SLAVERY STATEMENT 2023

Approved by the Board of Directors  
of Brunello Cucinelli S.p.A. on March 14<sup>th</sup>, 2024



## INTRODUCTION

The purpose of this statement, approved on March 14, 2024 by the Board of Directors of Brunello Cucinelli S.p.A. (hereinafter also "Casa di Moda" or "Company"), is to indicate the prevention measures and policies as well as internal controls implemented by the Brunello Cucinelli Group (hereinafter also "Group") to prevent in the exercise of its activities the risks of modern slavery, human trafficking or forced labour, in accordance with the obligations set forth in the "Modern Slavery Act 2015 - Section 54" of the United Kingdom.

According to the humanistic capitalism model adopted by the Company, profit is earned with an attention to minimizing any harm to human beings and respecting people's moral and economic dignity; a part of this profit is utilized for initiatives which enhance the human condition. This leads to the ideal of feeling like a keeper of the Created. Therefore, the social sustainability of growth and healthy profitability are the Company's defining characteristics: human beings are placed at the centre, work is intended as an expression of human worth, and profit becomes a means to reach the final aim of what is "truly" right, in order to improve the lives of everyone.

To this end, we are committed to spreading awareness, improving our due diligence processes, and working with our partners and stakeholders to ensure that the principles behind the above-mentioned Modern Slavery Act are not only respected, but also embedded in our business and that of our partners and stakeholders.

This statement refers to the FY ending 31 December 2023 and its application extends to all companies of the Brunello Cucinelli Group.



## THE BRUNELLO CUCINELLI GROUP

Brunello Cucinelli S.p.A., a company listed on the Italian Stock Exchange as of 2012, is the parent company of the Brunello Cucinelli Group, whose structure is shown in the infographic below (ref. Figure 1).

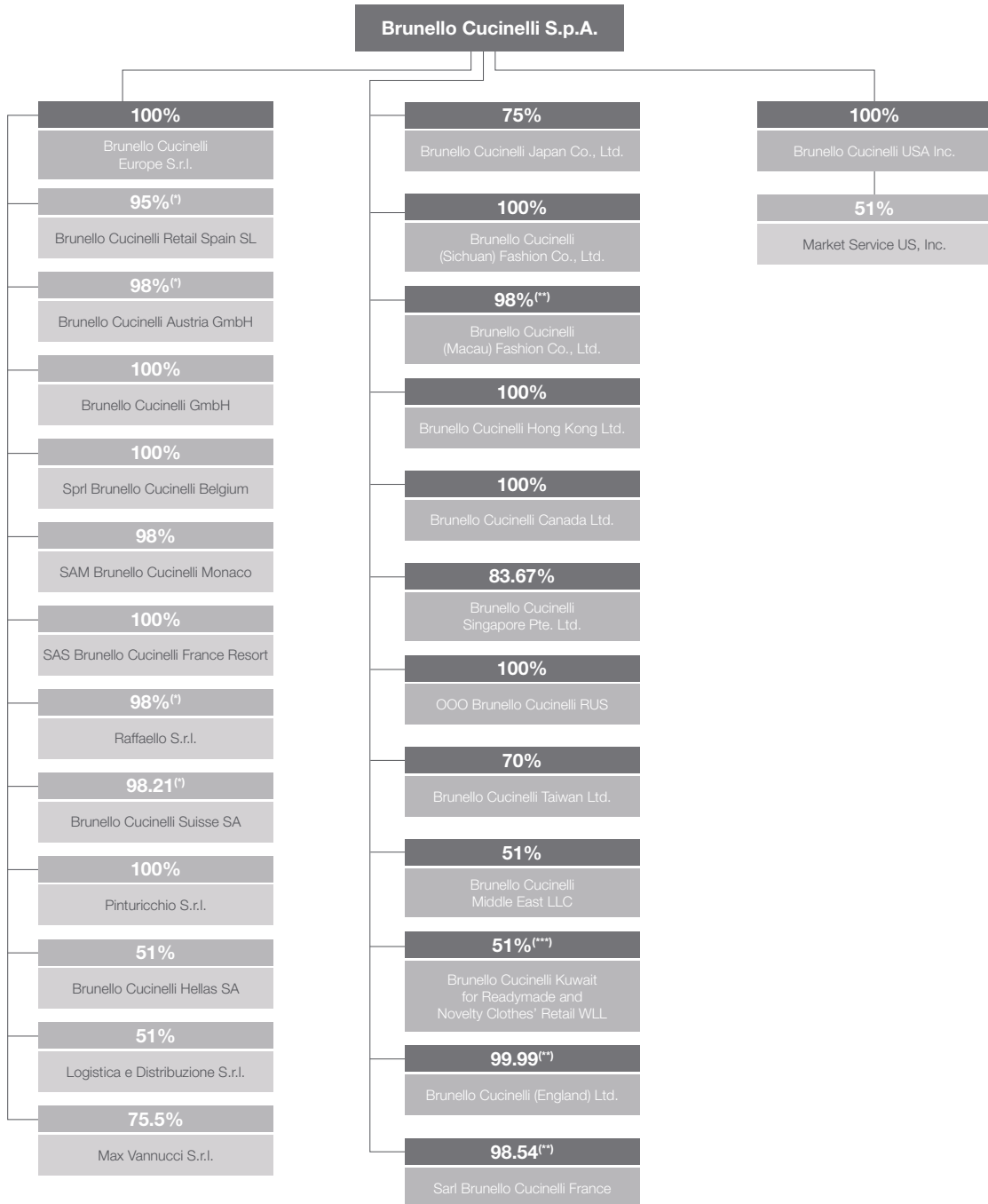
Further details on the Group's composition, activities and commitment to human rights along its supply chains and operations are available on the website <https://investor.brunellocucinelli.com> (sections 'Corporate Governance / Documents' and 'Corporate Governance / Group Structure').

Brunello Cucinelli S.p.A. is an Italian Casa di Moda founded in 1978 by the eponymous designer and entrepreneur and is listed on the medium and large companies stock exchange (MTA) of Borsa Italiana. Long rooted in the medieval Umbrian hamlet of Solomeo, the company is guided by an entrepreneurial philosophy that focuses on the major themes of “Harmony with Creation”, respect for the dignity of every living being, and the pursuit of balanced growth in full accordance with the ethical values embodied in the founding principles of Humanistic Capitalism and Human Sustainability.

The collections seek to interpret the most authentic spirit of the Italian way of life, recreating with passion and ethics a taste perpetually balanced between elegance, creativity, contemporaneity and craftsmanship, one rooted in the values of tailoring and high craftsmanship peculiar to the Italian tradition and the Umbrian region, and deftly combined with an emphasis on innovation and contemporary style. Through a path of healthy, fair and sustainable development, the company seeks to generate profits with integrity and harmony, while respecting the moral and economic dignity of the more than 2,900 people who work for our company.



Figure 1 – Group structure



(\*) The remaining percentage is held by BRUNELLO CUCINELLI S.p.A.  
 (\*\*) The remaining percentage is held by BRUNELLO CUCINELLI EUROPE S.r.l.  
 (\*\*\*) Percentage of ownership held by virtue of voting agreements with the minority shareholder.



## OUR IDEA OF HUMANISTIC CAPITALISM AND HUMAN SUSTAINABILITY

What we mean by **Humanistic Capitalism** and Human Sustainability is the idea that company must, yes, make a profit, but must also operate with **ethics, dignity and morality**. These ideals are in fact founded in the concept of a **fair profit balanced with giving back to the community** and in prioritising **respect for people** and their moral and economic dignity, **and for Creation**, with which we constantly strive to live in harmony. Only in this way can profit, giving back, guardianship and dignity of the human being create **mutual enrichment**.

A healthy and sustainable balance between profit and giving back, the reconciliation of work and human privacy, and a desire to repair and reuse are therefore key values for our Company, high principles based on which we have always tried to run our business.

In culture and in spirituality, as well as in the economy and in the environment, lie the forms that complement the meaning of sustainability, which we believe is one and the same with Humanistic Capitalism, **as an inclusive concept encompassing everything, material and immaterial, or even spiritual, that regards the human being**. The common thread running through all this is **universal and integral humanism**.

Further information on the above concepts can be found in the Consolidated Non-Financial Statement (NFS) 2023 on the Company's investor website at the following link:

<https://investor.brunellocucinelli.com/en/services/archive/investor/non-financial-disclosure>.



## ENDURING IDEALS OF LIFE AND WORK – OUR DECALOGUES

The six forms of Human Sustainability are associated with enduring ideals of life and work, expressing the values contained in five decalogues and based on which we have built our idea of Humanistic Capitalism and Human Sustainability, which guide our daily lives and actions.

This is followed by Decalogues dedicated to our long-standing ideals of life and work, our human resources and our esteemed partners<sup>1</sup>.

### *Our Enduring Ideals of Life and Work*

- I. We love and respect Mother Earth: we cultivate our land according to nature and we welcome its fruits as its greatest gift*
- II. We do not use more resources than is necessary and natural. We make careful use of the universe.*
- III. We always act as loyal and affectionate guardians of Creation.*
- IV. We believe in the moral and economic dignity of the human being.*
- V. During work we support fair profitability and harmony between profit and giving back to the community.*
- VI. We seek harmony between fair work and human privacy.*
- VII. We commemorate our forefathers. They taught us to respect the law, and our story is written in their words.*
- VIII. We believe in the universalism of the world and act with great respect for all civilisations.*
- IX. We accept the right changes to live the best part of our times.*
- X. We love young people and convey to them the hope and dream of the bright future that awaits them.*

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<sup>1</sup> Decalogues dedicated to our Mother Earth and our idea of Corporate Longevity are published on our Corporate website: [www.brunellocucinelli.com](http://www.brunellocucinelli.com).



### *To Our Gracious Co-Workers*

- I. We have always made sure that our **workplaces** are **well-maintained** and **welcoming**, places where you can always raise your eyes and look at the sky.*
- II. We **all** work **fair hours** and **share the same working hours**; but nobody is connected on Saturdays and Sundays.*
- III. We have always made sure that **wages** are a little **higher for everyone**, without any **difference**.*
- IV. In our Company we want everyone to have **equal opportunities**, as we are constantly aware of the value of their knowledge.*
- V. We have paid **utmost attention to promoting healthy relationships based on respect and trust** between workers, whom we consider to be **thinking souls**.*
- VI. We believe in the great **value of culture** as a factor of human improvement. That is why we kindly promote it.*
- VII. We are aware that passing on knowledge fosters creativity and talent. For this reason in Solomeo we have established the **School of Arts and Crafts**.*
- VIII. If our Company lasts for centuries, as we hope, it will also be thanks to the **generational change that we have always nurtured over time**.*
- IX. It is our habit to **meet regularly throughout the year and talk to each other**, so that everyone can learn about how the company is evolving.*
- X. We never stop looking for the **genius** in others and, when we find it, we endeavour to **make the most of it**.*



### *To Our Esteemed Partners*

- I. We would like your **workplaces** to be **welcoming and friendly**.*
- II. It would be nice if your **relationship with your employees** continued to be **genuine and harmonious**.*
- III. We believe in the primary value of **fair wages, without exception**.*
- IV. We would like your employees to work **fair hours** when they work for our Company.*
- V. It would be lovely if, a bit like we do here, you too ensured a **constant generational turnover**.*
- VI. We believe it would be lovely if in all your activities you always **respected and considered the development of the local area**.*
- VII. We fervently wish our **attitude** towards you to remain **loyal and true**.*
- VIII. We feel it is lovely that, as we do, you **work closely with one other, while being aware of each other's complete and mutual independence**.*
- IX. We would be happy to continue to **support the planet together** using the resources of Creation according to the ancient rules of nature.*
- X. We would like **stay true to our traditional annual meetings**, where we can discuss the future and our plans, thus renewing the friendly relationship that has long bound us together.*





## SAFEGUARDING OF THE UNIVERSAL HUMAN RIGHTS

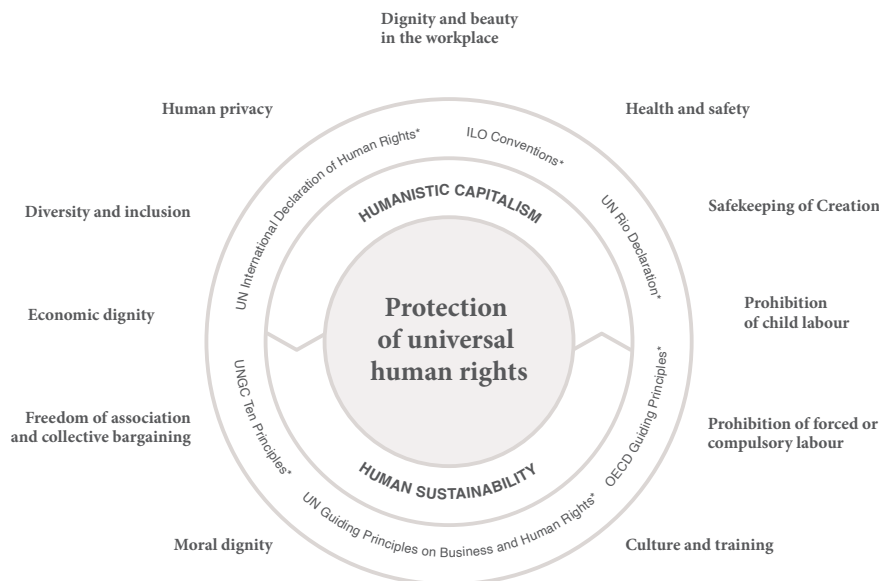
The protection of and respect for human rights inspires the Casa di Moda’s entire value chain, from the management of human resources to the organisation of the production process, the attention to human relations with small craft enterprises, and even the unique relationship we share with our friends of the brand.

We view universal human rights according to a **holistic and inclusive approach** that therefore is targeted towards including all the rights set out by the **United Nations’ Universal Declaration of Human Rights** of 1948, by the **Conventions of the International Labour Organisation**, in particular Convention no. 111 on discrimination, and by the **1992 Rio Declaration** with specific reference to the right of human beings to a healthy and productive life in harmony with nature.

We act in accordance with the United Nations Guiding Principles on Business and Human Rights, the OECD Guiding Principles and the Ten Principles of the United Nations Global Compact (UNGC), with particular regard to the six principles related to the protection of human rights.

The following infographic highlights the controls implemented by the Group with reference to the safeguarding of universal human rights, for which we are committed to guaranteeing just and increasingly attentive protection and promotion, also as a part of our large project called “*The universal working conditions for human being and our idea of a beautiful factory*”.

Figure 2 - Our safeguarding of universal human rights



\* International sources that the Company has referred to for an overall analysis of its impact on human rights (with regard to the Ten Principles of the United Nations Global Compact, the six Principles relating to human rights were given particular consideration)



## OUR HUMAN RESOURCES

The core of the company philosophy that animates and supports the work in Solomeo, and that is projected towards the world from here, ensures that the company always places **human beings at the centre of everything**, with its **network of interpersonal relationships**, respecting them with their **moral and economic dignity** and their **creative genius**.

Human resources are the engine of our Casa di Moda and ensure its value and continuity over time. Therefore the promotion of the **dignity and wellbeing of everyone**, enhancing **individual skills** and **personalities** with the **awareness of the value of everyone's knowledge**, has always been a priority objective the company pursues.

In 2023, the Group's human resources counted **2,913** people (+18% compared to 2022), with the majority of the company's workforce concentrated in Italy (54%). 63% of human resources are women and 37% are men.

We currently have the privilege of working with **68 different nationalities**, each of which bring its own value to company life.

**Uniqueness, fairness and inclusion** are core values for the company organisation; they are vital sources of mutual enrichment and stimulation, both on a personal and professional level. We protect and value **different physical and mental abilities**, ensuring a working environment that is safe, healthy and above all supportive of the needs (whether visible or invisible) of all our employees.

The relationship between the Group and its human resources is underpinned by the **promotion of each individual's proactive and innovative spirit**, opening up **paths to broaden and improve knowledge, skills and professional experience**, and ensure **fair economic dignity** – one of the key pillars on which our Humanistic Enterprise is built.

Specifically, there are nine types of training courses. In addition to these pathways, training courses are also developed on specific topics, e.g. the topic of diversity and inclusion.

In this regard, the 'Brunello Cucinelli - Diversity & Inclusion' course, initially accessible to human resources in Italy, was extended in 2022 to the regions of the European and American locations and specially **translated into English, Russian, Chinese and Japanese** and made available in the latter three languages in 2023.

Overall, **40,731** training hours were provided in 2023 – an average of around 13.98 training hours per employee Group-wide.



## SUSTAINABLE SUPPLY CHAIN MANAGEMENT

Our principles and values form the basis of the valuable relationship that binds us to our suppliers.

The Company's supply chain is made up of companies of proven reliability, with whom we have developed a genuine long-term partnership based on a strong complementarity of knowledge and mutual respect.

**For the purchase of raw materials**, the Company works with companies with proven reliability, with whom an authentic multi-year partnership has been developed based on strong complementarity of knowledge and mutual respect.

As of today, we collaborate with **273 raw material suppliers** (255 in 2022) to support Brunello Cucinelli's collection, which in 2023 was represented 84% by clothing and 16% by accessories.

**94.5% of our suppliers operate in Italian territory**, and 4.8% are located in Europe – in particular Spain, Portugal and France – 0.7% in Japan, from where we receive the supply of denim.

As regards cashmere, our main supplier is Cariaggi Lanificio S.p.A. – located in Marche – with whom we have had a consolidated, human and trust-based relation for more than 30 years. The cashmere is also dyed on the supplier's premises in the colours defined by us after careful research and colour development.

Leather is mainly sourced from Italian tanneries, primarily located in Tuscany, Campania and Veneto. Some of the fine hides come from French tanneries and the Iberian Peninsula.



Figure 3 – The distribution of small craft enterprises in the Italian territory



With reference instead to our external production structure, today there are **393 medium-small sized artisan companies** – all used in a continuous manner<sup>63</sup> –, selected on the basis of **skills and traditions of their territory** and of which more than half work exclusively for our Company. Overall, these laboratories have **approximately 7,100 employees**.



Over the years, we have been able to admire both a dimensional growth of the laboratories with whom we collaborate as well as an increase in the share of work reserved to us by those artisan companies that work with multiple customers.

The large number of laboratories with which we work guarantees that we can **significantly diversity the assignment of the work**, so that there are always multiple highly qualified, specialised companies for every production phase.

We value a **short production chain** – as in the case of the supply of raw materials mainly purchased from Italian suppliers – located exclusively in Italy, with **approximately 76%** of the artisan companies located **in Umbria** (301 artisan companies in Umbria with whom we collaborate continuously), which is the cradle of artisan techniques, taught and passed down through families.

For the remaining 24% the Company works with some laboratories in **districts of excellence** for the specific types of processing: in Tuscany, Marche, Abruzzo, Lazio, Lombardy and Veneto. The greater distance of these companies does not jeopardise the **value-based and relational proximity** we try to establish constantly with each of them.

Relationships with small craft enterprises are based on the Company's commitment to restore the rightful moral and economic dignity to manual skills, which is substantiated by the rediscovery and promotion of craftsmanship, particularly with respect to younger generations, by ensuring that a proper wage is always paid without any discrimination, and by contributing to the beautification of workplaces and the consequent improvement of the wellbeing of the people who work in them.

We have always been taught to imagine the factory as a purely industrial place. What we want to promote instead is the creation of a "beautiful factory" where working conditions can be better and where creativity can develop thanks to the contribution of all the people who work there.

In 2022, our Company, consistent with its own ideal of moral and economic dignity of labour, conceived the project "Beautification of workplaces".

This project, which was created to provide long-term support to our laboratories, was created based on some **specific needs that have arisen over the past years when speaking with the small craft enterprises**: the improvement of the workplace and working conditions in the artisan laboratories; the reduction of the environmental impact of each laboratory; the auto-generation of electricity from renewable sources, therefore reaching the objective of energy independence; the guarantee of business continuity from a production point of view for Brunello Cucinelli; the elimination of cost fluctuations for energy from the income statement of small artisan companies; avoiding them from going into significant debt. The project is also focused on the beautification of the workplaces as a **lever for attracting new generations** as regards manual work, making it a **more contemporary job** – also thanks to digitalization – and at the same time a guarantor of local artisan traditions. After the initial study and development phase started in 2022, the project was formalized and started in 2023.



## COMPANY POLICIES

By adopting Policies and Procedures, the Company intended to incorporate the distinctive principles of the philosophy that inspires the entire Group and to give shape to the practices already in use. Through the dissemination of the Policies, both internally and externally in relations with our partners, we hope to share the culture and values cultivated in them and that support our way of doing business.

The Group is strongly committed to ensuring the **protection of human rights for all workers**, both within the Group and throughout its supply chain, and has implemented a set of policies and procedures to ensure their adherence and enforcement:

- **The Code of Ethics** It defines the rules, values and principles underpinning the operations of Brunello Cucinelli S.p.A. and its subsidiaries, and acts as a guide to the behaviour and actions of all stakeholders relevant to the Company. The adoption and application of the Code of Ethics is essential for the achievement of the Company's primary objective, which is the creation of value for all the Group's stakeholders. In particular, the Code proclaims the principles of respect for the personality and dignity of every individual, prevention of discrimination, harassment and abuse of any kind, promotion of equal opportunities, recognition of fair remuneration and fair and impartial recognition of knowledge, skills and professional experience. It is an integral part and reference ethical framework of Brunello Cucinelli's Model 231, formalizing a coherent system of organizational, management and control principles, provisions and procedures.
- **The Model pursuant to D.lgs. 231/2001** (the "Model 231") It defines a control system for so-called "Sensitive Activities", i.e. those areas of activity that are most exposed to the occurrence of the offences/predicate offences identified by the Legislative Decree No. 231/2001. Of these, the purchase of materials for manufacture, the outsourcing of work to craft workshops and the provision of consultancy in various capacities deserve particular attention. Model 231 is the tool to guide the behaviour of all the recipients thereof, who operate within the Group or on its behalf, promoting conduct inspired by the principles of fairness and transparency. The provisions contained therein enable the Company to intervene promptly in order to prevent and counteract the commission or omission of offences, and, where appropriate, penalize the conduct of the recipients who are in breach of the model. The disciplinary measures envisaged are appropriate and commensurate with the seriousness of individual violations of the rules.
- **Whistleblowing Procedure pursuant to D.lgs. 24/2023** The Whistleblowing Procedure was last updated by the Company's Board of Directors on 19 October 2023 and came into force on 15 December 2023. The update incorporates the latest regulatory provisions of Legislative Decree No. 24/2023. The Whistleblowing Procedure is an integral part of the Organization, Management and Control Model (Model 231) and governs the mechanism for reporting to the Internal Audit Manager all unlawful conduct and any violation of Model 231 and the Code of Ethics, as well as, more generally, violations of the procedures and provisions adopted internally. In the event of conduct contrary to the provisions contained in these documents, proceedings shall be initiated which, in the most serious cases, may even result in the termination of the existing contract.



Reports may be made anonymously or by name, the latter being recommended in order to allow a more effective and efficient investigation where necessary, while always guaranteeing full protection of the reporter or anyone cooperating in the investigation against possible acts of retaliation.

The channels made available for reporting are as follows:

- Electronic mail or certified electronic mail (PEC);
  - Letter sent to the postal address of the Company's registered office;
  - Whistleblowing application accessible from the "Compliance" section of the Group's intranet or from the Company's Investor Relations site, which is handled in an encrypted and confidential manner by a third party;
  - Registered letter sent in a sealed envelope to an independent person appointed by the Company, who will replicate the report in the Whistleblowing application.
- The **Framework Agreement** is included in the contractual documentation underlying the relationship with small craft enterprises and with raw material suppliers. It contains the rules of conduct that must be observed, as well as specific commitments and duties. In particular, the provisions related to social aspects concern:
- The proper classification and fair remuneration of employees;
  - Compliance with all applicable laws and regulations on health and safety in the workplace, social security, insurance, welfare, pay, tax and fiscal matters;
  - Recognition of freedom of association for all its workers;
  - Prevention and protection of staff against discrimination, abuse and harassment;
  - Prohibition against the use of child labour or forced labour.

The Framework Agreement also refers to the observance of the **Code of Ethics** and the company's **Model 231**. In order to strengthen our commitment to monitoring and promoting sustainable practices throughout the value chain, as of 2021 we have supplemented the contractual documents shared with our partners with Human Sustainability Policy and Diversity and Inclusion Policy.

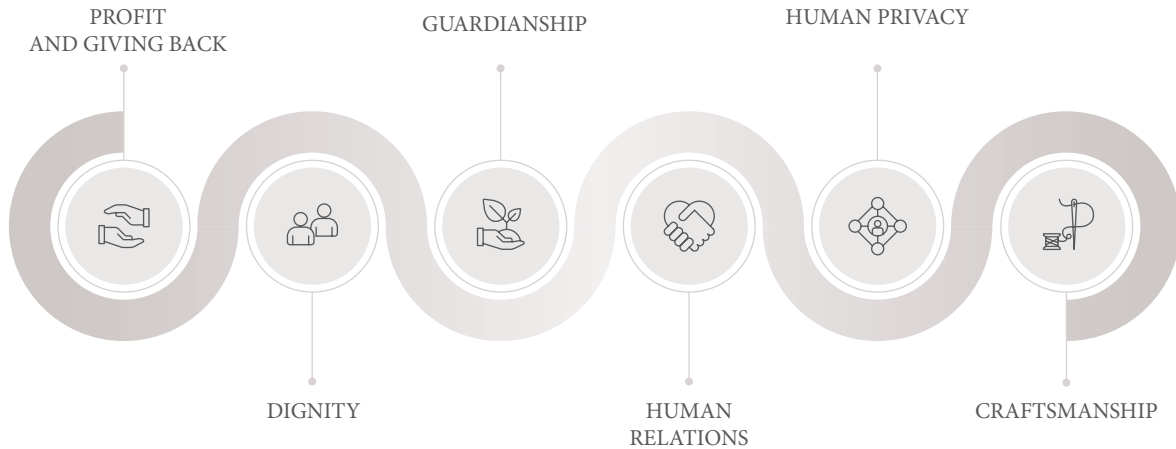
- **The Human Relations Policy**, approved by the Board of Directors on March 2021, was drafted with the aim of sharing internally the principles and values that must guide our dialogue with all stakeholders, direct the methods of involving them – diversified according to the categories of stakeholders involved – and identify the internal functions responsible for the engagement process and related reporting.

Specifically, the principles that we believe must guide the interactions with all our stakeholders are as follows:

- Provide complete, timely and accurate information to stakeholders on the Group's activities, decisions, projects and initiatives through the most transparent communication possible;
- Work together to generate long-term value, with the aim of creating the right conditions to maximise the contribution of each individual stakeholder;
- Seek out the feedback and points of view of stakeholders. Indeed, we consider it essential to develop a cultural feedback, both internally and externally, in terms of open discussion on topics considered relevant in the environmental, social and economic/governance dimensions and return of results from engagement;
- Increase satisfaction and trust in the Group, as the effectiveness of the interaction is strongly related to the perception that stakeholders develop of the brand identity and corporate reputation.

- The **Human Sustainability Policy**, adopted by the Board of Directors on 11 March 2021, aims to convey to all our esteemed stakeholders the concept of 'fair', i.e. a relevant, innovative, timely, forward-looking, respectful and harmonious approach to Creation and humanity. Our sustainability path is translated into commitments represented according to a six-pillar structure.

**Figure 4 – The pillars of the Human Sustainability Policy**



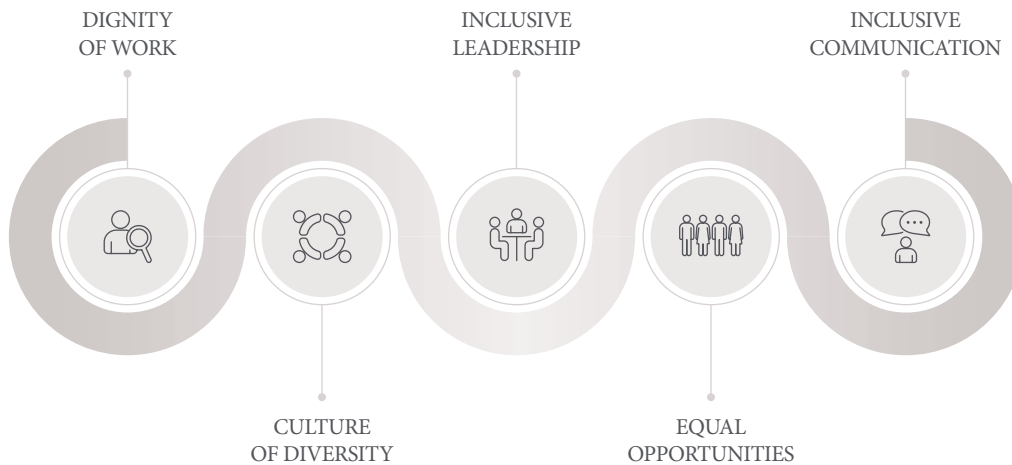
By adopting the Policy, the Company intended to incorporate the distinctive principles of the philosophy that inspires the entire Group and to give formal structure to the practices already in use in the Company. Through the dissemination of the Policy, both internally and externally in the relationship with our partners, we hope to share the culture and values cultivated therein and that support our way of doing business.

The Policy was drafted with the intention of aligning our conduct with the highest international standards, such as the 1948 Universal Declaration of Human Rights, the Conventions on Fundamental Principles and Rights at Work issued by the International Labour Organisation (ILO) the 2011 Organisation for Economic Co-operation and Development (OECD) Guidelines, the UN Global Compact Principles, the 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (hereinafter also referred to as 'SDGs') and the 2015 Paris Climate Agreement (COP21).

- The Diversity and Inclusion Policy, approved by the Company's BoD in March 2021, finds its foundation in the Group's Code of Ethics and formalises our commitment to understanding, welcoming and valuing the uniqueness of each person within all internal organisational and management processes. Through it, therefore, we aim to prevent all forms of discrimination, prejudice and harassment in the workplace - verbal, physical or visual - however unconscious they may be, capable of affecting an individual's personal integrity.



*Figure 5 – The pillars of the Diversity and Inclusion Policy*



Specifically, the structure of the Policy is divided into five pillars whereby we commit to encouraging ever-greater inclusion of the areas of diversity (recognised thanks to a listening process with the HR Managers of the various regions) that are currently most representative for our business.

The contents have been drafted in such a way as to ensure alignment with current legislation and the principles defined by the relevant International Organisations, with particular reference to the United Nations Universal Declaration of Human Rights and the International Labour Organisation's (ILO) Convention No. 111 on Discrimination, which we align ourselves with in the definition of discrimination, understood as "any distinction, exclusion or preference made on the basis of ethnicity, colour, sex, gender or sexual orientation". 111 on Discrimination of the International Labour Organisation (ILO), with which we align ourselves in the definition of discrimination, understood as "any distinction, exclusion or preference made on the basis of ethnicity, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in respect of employment or occupation. Likewise, the SDGs, in particular Goal #5 - Gender Equality and Goal #10 - Reducing Inequality, are a central source of inspiration.



## RISKS AND OPPORTUNITIES: IDENTIFICATION, ASSESSMENT AND MANAGEMENT ALONG THE VALUE CHAIN

The **prevention and management of risks** that could jeopardise the achievement of the Group's objectives and business continuity and the clear **identification of opportunities** that can contribute to our project of respectful, healthy growth are a **strategic priority** for us.

Therefore, to oversee and support the risk prevention and management activities, the Company has implemented an Internal Control and Risk Management System ("ICRMS"). The ICRMS provides for the oversight and interaction of the various corporate bodies and entities operating in the three lines of defence (more recently referred to as the 'three lines'), in accordance with national (such as the Corporate Governance Code promoted by Borsa Italiana) and international (such as the COSO 'Integrated Controls' and 'Enterprise Risk Management' frameworks) leading practices. Further information on the ICRMS can be found in the Annual Report on Corporate Governance and Ownership Structure published by the Company on its website [investor.brunellocucinelli.com](http://investor.brunellocucinelli.com).

With particular reference to human rights, the Group continuously monitors risks related to labour standards and human rights throughout its supply chain.

The selection phase is a key step of the collection development process in order to guarantee the high quality and compliance of our product range.

The search for suppliers is therefore an ongoing process that on the one hand involves solid, long-term relationships, and on the other meticulous and continuous accreditation of new partners, in line with the principles and values underpinning our philosophy and the stylistic requirements of the collections.

Suppliers are selected based on the highest quality, reliability, and the attitude to the promotion of integrity and ethics in business.

In accordance with the relevant regulations, we are committed to ensuring that the selection processes take place in compliance with the principles and laws protecting competition, ensuring maximum transparency and efficiency of the process, and that they are characterized by the promotion of equal opportunities of participation and impartiality of assessment of the supplier meeting the necessary requirements.

The assessments and checks carried out during the selection stage are designed to evaluate adherence to a range of regulations and standards, not only working to prevent harmful practices against human rights but also assess the existence of conditions that uphold the dignity of the individuals.

Once the relationship with the selected suppliers has been established, the aforementioned national and international compliance requirements are constantly monitored by the Third-party Manufacturer and Supplier Information Department. When concluding the contract, the Third-party Manufacturer and Supplier Information Department shares the Framework Agreement with the suppliers – and also with small artisan workshops – which includes the rules of conduct they must comply with, as well as specific commitments and duties such as, the adherence to the, the ethical code, model 231 and all the previously mentioned policies and practices.



In order to strengthen our commitment to monitoring and promoting sustainable practice, also regarding human rights, along the entire value chain from 2021 onwards we have supplemented the contractual documents shared with our partners with the “In harmony with Creation” Human Sustainability Policy and the Diversity and Inclusion Policy, with respect to which their acknowledgment and adoption of business conduct aligned with the principles set out therein is required. The **self-assessment questionnaire** – entitled “Value: a virtuous circle of human sustainability” – distributed to our partners from 2020 onwards also constitutes a further element for managing the relationship with suppliers and monitoring their compliance and level of maturity in the environmental, social, and ethical fields. Specifically, taking inspiration from the main international references on environmental, social, and governance issues, the assessment requires providing documentation on the management controls put in place by supplier companies with respect, among other things, to the respect for human rights.

In order to strengthen the progress made, in 2022, the Group carefully assessed several external partners and selected the entity capable of assisting in the mapping of supplier information. The chosen partner's technology platform enables the collection of primary data through **qualitative-quantitative assessments**, which evaluate and quantify the effects of the supply chain. Particularly, the questionnaire includes a dedicated section addressing the safeguarding of workers' rights. The objective is to guarantee that suppliers not only comply with legal obligations but also embrace social responsibility by giving precedence to the health and welfare of their employees.

After an initial phase of supplier involvement, useful for the presentation and introduction to the project, the activity started in September 2023 with **156 suppliers**, representing the source of about 95% of the raw materials. Of the suppliers involved, 133 provided a full response to the questionnaire shared on the platform during the year. For the remaining suppliers, whose data were partial at the end of the year, the data collection will be completed in 2024.

Finally, starting in 2023, the Company will make its whistleblowing channels available to its raw material suppliers and small artisans (as well as third parties in general) to report violations, even anonymously.

## LOOKING AHEAD

The Group will maintain and strengthen its commitment to conducting its business in a responsible manner, unequivocally opposing all forms of modern slavery and promoting the highest respect for human rights. This commitment will extend to the dissemination along the value chain of the principles that inspire the Group's ethical and responsible business practices.