



HUMAN RIGHTS POLICY

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MONCLER
GROUP



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Introduction

For the Moncler Group (hereinafter also “the Group” or “Moncler”) design, product quality, safety and innovation have always been priorities, ensuring the continuous research for excellence. Such excellence does not allow compromises in any areas: from the choice of the finest materials, to the accuracy in garment production, to the protection of the environment, to the utmost respect and protection of human rights, of health and safety, and of the workers’ well-being.

The Group is committed to promote responsible business management at all levels of its production chain by respecting and contributing to the protection of all individuals’ rights. The Human Rights Policy (hereinafter also the “Policy”) sets out the principles underlying the commitment to respect and promote fundamental human rights, and to prevent and mitigate any potential negative impacts of the Group’s activities through an approach based on risk assessment criteria, inspired by national and international standards and best practices.

The Policy and principles set out herein also represent the Moncler Group’s contribution to the achievement of the United Nations Sustainable Development Goals (SDGs) – a commitment also proven by the Group’s membership of the United Nations Global Compact.

Scope of the Policy

The Human Rights Policy describes in detail the fundamental principles that the Moncler Group respects and strives to enforce, wherever it operates, directly or indirectly, with regards to each of the following stakeholders:

- **Workers**

It is **people** who, through their talent, professionalism, creativity, passion and dedication, made up the Moncler Group’s history and continue to be a key element of the business’ success. All those working directly or indirectly for the Group, whether at its own corporate sites or throughout its supply chain, represent a strategic asset whose human rights Moncler is committed to respect and requires to respect every day.

- **Clients**

The Moncler Group attributes a central role to its **clients**. Every contact moment is an opportunity to welcome and get to know the clients, but also to share, involve, surprise and get feedback for improvements. In addition to offering an informed purchasing experience, including the origin of the products and the methods used to produce them, every project and initiative is characterized by a close attention to the clients and individual’s respect.

- **Communities**

The Moncler Group has always been committed to respecting local **communities** where it operates – and engage in an open and collaborative dialogue – directly, or through relevant organisations. This active relationship stems from the awareness that a company can only thrive by being in harmony with and fully respecting the community where it operates.

The Group also commits to protect and safeguard the human rights of the groups or persons in situations of vulnerability in the conduct of its activities. This includes the rights of children, young workers, women, migrant workers, indigenous peoples, temporary workers, home-based workers, seasonal workers, and of other minorities or categories of people at risk of marginalization. For these groups, the Group pays special attention to the implementation of its due diligence processes aimed at safeguarding human rights, ensuring that every decision and action is guided by a profound respect for human dignity and international regulations.

In line with the Code of Ethics and the Group's Supplier Code of Conduct, the principles contained in this Policy are an integral part of the business culture and strengthen the commitments already established in the Group policies: such as the Anti-Corruption Policy, the Environmental Policy, the Health and Safety Management Policy, and human resource management policies (for further details, see Annex 1).

Moncler is committed to ensure that this Policy is applied by all Moncler Group companies, without any distinction, to all people working for the Group, directors and supervisory bodies, and employees of all levels and positions, in any Country. Furthermore, Moncler requires its suppliers, business partners, wholesale client network, and all those acting in the name, or on behalf of the Moncler Group, in any capacity, and in any Country, to respect the principles and contents of this Policy.

All suppliers and business partners must carefully read, understand and adhere to the principles and rules of conduct contained in this Policy.

The Group is proactively committed to promote - also through partnerships with the members of its supply chain, organisations, associations, and the civil society - the human rights included in this Policy and the social development connected to those rights.

Moncler does not tolerate and does not contribute to threats, intimidation, or attacks (both physical and legal) against human rights defenders¹ and requires the same of its suppliers and business partners. The Group also commits to engage with human rights defenders to create working environments that are safe and that enable human rights protection at local, national, and international levels.

International reference standards

This Human Rights Policy is based on the major national and international human rights laws and regulations, including:

- The International Bill of Human Rights of the United Nations
- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The Charter of Fundamental Rights of the European Union
- Decent work standards in ILO (International Labour Organization) conventions²
- The OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises
- The United Nations Convention on the Rights of the Child
- The United Nations Convention on the Elimination of All Forms of Discrimination Against Women
- The United Nations Guiding Principles on Business and Human Rights
- The Ten Principles of the United Nations Global Compact
- The United Nations Sustainable Development Goals
- The Modern Slavery Act
- The California Transparency in Supply Chains Act
- The Italian Legislative Decree No. 231/2001
- The Directive 2014/95/EU on the disclosure of non-financial information

The Policy, in addition to requiring the compliance with the applicable laws, sets out minimum requirements to be respected, based on international principles that may be more restrictive than those set forth in applicable local laws and regulations.

¹ "Human rights defender" (HRD) is a term used to describe people who, individually or with others, act to promote or protect human rights in a non-violent way.

² These include: the Declaration on Fundamental Principles and Rights at Work, the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), the Right to Organise and Collective Bargaining Convention, 1949 (No. 98), the Forced Labour Convention, 1930 (No. 29), Protocol of 1946 to the Forced Labour Convention, 1930 (P29), the Abolition of Forced Labour Convention, 1957 (No. 105), the Minimum Age Convention, 1973 (No. 138), the Worst Forms of Child Labour Convention, 1999 (No. 182), the Equal Pay Convention, 1951 (No. 100), the Discrimination (Employment and Occupation) Convention, 1958 (No. 111), the Hours of Work Convention, 1919 (No. 1), the Weekly Rest Convention, 1921 (No. 14), the Minimum Wage-Fixing Machinery Convention, 1928 (No. 26) and the Occupational Health and Safety Convention, 1981 (No. 155).

If the requirements set forth in this Policy turn out to be more restrictive than locally applicable laws and regulations, but not in conflict with them, the requirements of this Policy prevail.

Where compliance with some provisions of the Policy results in a violation of any applicable laws and/or regulations, local laws and/or regulations must be respected, promptly notifying the Group of the conflict, while also stating how to continue to comply with and uphold the principles and purposes of the Policy.

PROMOTION AND RESPECT OF HUMAN RIGHTS

The Moncler Group is aware that there can be no long-term growth without responsibility and respect of fundamental human rights. Over the years, this awareness has led the Group to strengthen its commitment by working with all relevant stakeholders to define and implement valid and concrete solutions such as: the adoption of specific measures to prevent or eliminate human rights violations; the execution of controls, carried out both directly and by third parties, and the implementation of corrective measures or, in the most severe cases, the interruption of the labour or business partnership with the subjects that do not respect those rights; and providing help to local communities via targeted support and development activities.

In particular, the Moncler Group undertakes to promote, respect, and ensure the respect of the following principles:

- **Prohibition of child labour**

For the Group, the protection of children's rights is a non-negotiable principle.

There is no tolerance of the use of child labour³, or the exploitation of children⁴ in any activity also throughout the supply chain.

Children under the age of 15 and those who have not reached the minimum working age set by the laws of the Country in which the Group or its suppliers and business partners operate must not be hired in any circumstances.

In addition, the type of work, duties, and conditions of work of employees under the age of 18 ("Young Workers") must be compliant with the applicable law and never pose a danger to their physical, mental, moral, and social health and safety, or prevent them from attending compulsory education.

- **Prohibition of any form of forced and compulsory labour, and of human trafficking**

The Moncler Group rejects all forms of forced, compulsory labour; work performed under the constraint of debt repayment, servitude and human trafficking; modern slavery; and any type of work performed under conditions of psychological and/or physical coercion.

Workers must not be forced to deposit personal documents, money, or guarantees. Similarly, all workers are free to withdraw from their employment contract, in line with applicable legislation, without fear of retaliation or punishment.

Such commitments require even greater attention to certain more vulnerable groups, such as migrant and/or refugee workers.

- **Prohibition of any form of discrimination and promotion of Diversity, Equity and Inclusion**

The Moncler Group aspires to embody a new concept of luxury, characterized by experience, inclusivity, sense of belonging to a community and cross-fertilization of different meanings and worlds - such as art, culture, music, and sport.

Operating in an international and multicultural environment, the Group considers diversity an asset to support, embracing and valuing all differences and letting everyone express their talent freely.

The Moncler Group is thus committed to promote, within and outside the company, a corporate culture focused on promoting diversity and allowing everyone to express their identity freely, in an inclusive working

³ Child labour: The ILO defines "child labour" as work that deprives children of their childhood, their potential and their dignity and that is harmful to their physical and/or mental development. [summary]: "Child labour" is defined as any of the following:

- an activity performed by a child not of the minimum age to be hired for the work in question; or by any child under the minimum working age engaged in non-light work
- an activity that interferes with compulsory education;
- an activity that might be prejudicial to the health, safety, and morals, of a minor, also known as "hazardous labour"; i.e. minor workers engaged in hazardous labour.

⁴ Child: any human being 18 years of age or younger unless the age of majority is lower according to applicable law.

environment, free from any kind of discrimination based on age, gender, skin colour, sexual orientation, marital status, religious beliefs, language, ethnic or national belonging, state of health and different physical or mental abilities, pregnancy, maternity or paternity - including by adoption, beliefs and personal opinions, political opinions, membership or trade union activity and any other forms of diversity.

As part of its commitment to promote and value diversity in all its forms, the Group pays particular attention to the protection of gender equality and of women's rights⁵, committing to respect those principles in all roles, for all professional categories and in all business processes.

Any form of intimidation, threat, harassment, or abuse, whether physical, psychological, or verbal that creates an intimidating, offensive and hostile work environment - including sexual harassment and sexual assault - is prohibited. Any form of unfair, humiliating behaviour - including in the form of abuse of power, or the adoption of offensive language, or attitudes of a racial, ethnic, sexual or religious nature - is severely prohibited.

For the Moncler Group, the promotion of diversity, equity and inclusion is a transversal principle that extends beyond the business context. In particular, the Group is committed to promote messages that value diversity, freedom of expression, rejection of any form of discrimination and promotion of inclusivity as a form of enrichment, integrating it into its culture and conveying it through all channels of communication and contact with clients and the communities in which it operates.

- **Respect of minorities and of indigenous peoples**

The Moncler Group recognises and respects the human rights of minorities and indigenous peoples (as defined by the United Nations, through the criterion of self-determination) in the communities and countries in which it operates or sources from, with particular reference to their cultures, lifestyles, institutions, ties to their homeland and development models, including the right to land, to resources, and to the protection of cultural heritage.

- **Recognition and protection of the freedom of association and of the right to collective bargaining**

The Moncler Group recognises and protects the right of its employees to establish or join workers' organisations of their own choosing and undertakes to respect and protect workers' representatives and to facilitate open dialogue with them and with the workers. In addition, Moncler always acknowledges the right of workers to bargain collectively for fair pay and adequate working conditions and protects the effective exercise of trade union rights in the workplace.

- **Protection of the health and safety at work**

The Group promotes a culture of health and safety in the workplace, at its corporate sites and at those of its supply chain, and is committed to provide working environments, workstations and processes that are safe for each worker.

In strict compliance with the accident prevention regulation, the Group works to prevent and reduce occupational accidents and diseases by adopting safety management systems based on the assessment, prevention, mitigation and awareness of the risks and measures to be adopted to safely operate. With this aim, the Group provides its employees - of all levels - with training, general and specific information and any other support needed to allow workers to work in safe conditions. In addition, it promotes the definition and application of emergency plans for the management of potential residual risks.

Lastly, Moncler is attentive to health in all its facets and is committed to assess and prevent work-related stress and promote training initiatives on wellbeing issues.

As with other human rights-related principles, the Moncler Group also requires this way of operating to be applied along its supply chain. In particular, Moncler expects the same management and commitment to health and safety to be respected by its suppliers and business partners, who are required to create a safe work environment, ensuring the health of employees by promoting people's wellbeing and prevention of occupational injuries, accidents and diseases. For this reason, suppliers and business partners are required to implement the processes and mechanisms needed to prevent and identify health and safety risks at work, as well as to adopt the necessary internal policies, in accordance with applicable laws.

⁵ As described in the United Nations Convention on the Elimination of all Forms of Discrimination Against Women.

- **Promotion of fair remuneration**

The Moncler Group has in place a remuneration system designed to attract, motivate and retain people with the professional skills required by the perspective of business development.

The Group designs and updates the remuneration system according to specific criteria, including market benchmarking and internal equity; the characteristics and responsibility of the role; and the distinctive skills of individuals - always with a view to fairness, equal opportunity, meritocracy and maximum objectivity - in order to avoid any form of discrimination.

In the countries in which it operates, the Group offers – without any difference between men and women – entry level salaries equal to, or above the minimum required by law, or by collective bargaining⁶, including in terms of overtime remuneration and benefits, building on the commitment to ensure a decent standard of living for workers and their families. In particular, salary should take into consideration market benchmarks and professional performance, as well as to the cost of living and basic needs including food, water, housing, education, health care, transportation, and clothing.

Finally, the Group recognizes the importance of paying workers within contractual terms.

- **Promotion of worklife balance**

The Moncler Group is committed to guarantee working conditions that respect personal wellbeing, recognising the need for everyone to find a balance between work and private life, and the right to rest and free time. In particular, the Group complies with all applicable laws and collective agreements on working hours and paid leave, with the goal of guaranteeing all employees a balance between the company's and employees' personal needs.

Regular working hours must not exceed 48 hours per week, and at least 24 consecutive hours of rest every seven days must be guaranteed, as well as paid holidays. Overtime must not exceed 12 hours per week. In the case that working hours consistently exceed the total of 60 hours per week, it is required to develop a plan to restore working hours in compliance with what is stated above. Overtime, however, must be an exception and must be consensual and paid at an increased rate.

The Moncler Group encourages and promotes a healthy lifestyle, through internal policies and mechanisms such as parental leave, training on wellbeing, assessing and mitigating work-related stress and defining prevention programmes aimed at improving people's wellbeing.

- **Fight against corruption**

The Moncler Group recognises the importance of creating an ethical work environment and condemns any form of corruption, both active and passive, whether in the form of unlawful favours, collusive behaviours, solicitation of advantages, provision of tangible and intangible benefits and other advantages aimed at influencing or compensating Moncler Group employees. The Group aims to build mutual trust with suppliers and business partners and therefore undertakes to avoid and/or suspend business relationships with anyone whose actions facilitate or enable corruption.

- **Responsible advertising and marketing**

The most stable and long-lasting relations are based on trust and transparency. For this reason, Moncler has always conducted every marketing and communication initiative responsibly across all channels, paying close attention to how, what, and with whom it communicates. The Group is committed to providing its clients with transparent, intelligible information, accessible to everyone, to allow an informed and responsible purchasing decision. In addition, all the images and messages conveyed through the different communication channels, both online and offline, are carefully formulated so that they reflect company's values, respect human dignity, are non-discriminatory and do not evoke violent behaviour or dangerous conducts. Special attention is paid to the communication of the children's collection, constantly focused on ensuring absolute respect for the fundamental principles underlying the protection of minors.

⁶ In cases where companies do not have a collective agreement, existing collective agreements in the same sector and country can serve as important sources of information.

- **Protection of privacy and of data security**

The Moncler Group recognises and respects the right to privacy of all its stakeholders (employees, collaborators, clients, suppliers, and partners) and is committed, in full compliance with applicable law, to appropriate use and responsible processing of the personal data it collects in all countries in which it operates.

- **Respect and protection of the environment**

The Moncler Group, both within its corporate sites and along its supply chain, is committed to reduce greenhouse gas emissions, protect biodiversity, adequately manage water and waste, develop an always more circular economy and use lower impact materials. In implementing these commitments, the Moncler Group is aware of the need to pursue a just transition - i.e. a fair and inclusive transition - towards energy sources, models, and lower impact materials that leaves no one behind and supports the communities for which the transition's impact is more complex. In this context, referring to the actions to be developed to mitigate its environmental impacts, the Moncler Group undertakes to also integrate social initiatives and causes, to engage in constant dialogue and engagement activities with all relevant parties of the affected communities.

APPLICATION

Management approach

To ensure the ongoing application of the human rights principles set out in this Policy for each area of application, the Moncler Group has established a comprehensive, systemic due diligence approach, which comprises various steps: embed responsible business conduct principles into policies and management systems; identify and assess risks and actual and potential adverse impacts; cease, prevent and mitigate adverse impacts; provide for, or cooperate in remediation; track implementation and results, and communicate how impacts are addressed; and training. The following due diligence process addresses all human rights issues identified in this Policy, including forced labor, human trafficking, child labor, freedom of association, the right to collective bargaining, equal remuneration, and discrimination.

In particular:

- *The Group's policy system*

The Moncler Group has adopted specific internal policies to guarantee and safeguard transparency and responsibility throughout its value chain. Those policies are: the Codes of Ethics of the Moncler brand and Stone Island brand which set out all the values the Group identifies with, shares, promotes and demands respect for, in the belief that behaviour inspired by principles of diligence, honesty and loyalty can be a major driver of economic and social growth; and the Supplier Code of Conduct that sets out Moncler Group's requirements in the main fields of the responsible supply process. It is made up of six sections that set out binding rules for suppliers and subcontractors on: Labour and Human Rights, Occupational Health and Safety, Environment, Animal Health and Welfare, Safety and Quality of Products and Services, Corporate Ethics and Protection of Intellectual Property.

The Group's policy system is periodically updated, based on internationally recognized best practices and includes, among others: the Anti-Corruption Policy; the Environmental Policy; the Occupational Health and Safety Management Policy; the Group Policies on tax, and the management of human and financial resources and company assets.

- *Risk assessment*

The Group's commitment to ensure the respect for human rights begins with the timely and prior identification of actual and potential risks of infringement of these rights.

Risk analysis is performed through different tools on all entities involved in the value chain: internal activities and all Moncler Group's corporate sites, current and potential business partnerships (e.g. mergers or acquisitions), suppliers, sub-contractors and their employees, including women, children, indigenous people and local communities, in any way connected or impacted - directly or indirectly - by the Group's activities. The identification of potential risks is performed and updated periodically, in order

to ensure constant compliance or, where necessary, intervention actions, and to guarantee that all the potential and actual new risks are identified.

- *Impact prevention and mitigation*

Based on an assessment of the actual or potential risk of human rights violations that may result from its activities or those of its partners, the Moncler Group has established specific due diligence processes to improve the effectiveness of its actions, aimed at preventing and mitigating negative impacts, both at its corporate sites and along the supply chain.

In particular, concerning the due diligence processes applied to the supply chain, where the main risks of potential human rights violations usually lie, the Group's attention to ethical and social issues starts at the supplier selection phase. Prior to the establishment of a business partnership, the supplier is assessed not only on its capacity to carry out the required tasks, but also through a preliminary ethical, social, and environmental audit, carried out by a third-party and/or, for raw material suppliers, through the completion of a thorough questionnaire. If the screening outcome is positive, the procedure then provides, in the contractual phase, for the formal acceptance by the potential supplier of the Code of Ethics and the Supplier Code of Conduct principles and of the other Group policies. After the signature of the contract, the supplier is subject to systematic awareness training and to on-site audits carried out by a qualified third-party with recognised experience. Knowledge, sharing of best practices, and verification are fundamental - not only to limit situations of risk, but also, and above all, to generate culture and promote the responsible and sustainable development of the business to the benefit of the entire supply chain.

With regard to the due diligence processes applied to internal corporate sites, and therefore aimed at verifying the respect for human rights at work, in the relationships with employees, clients and communities, the Group implements different operational tools (e.g. surveys, internal communication channels and whistleblowing platforms) and conducts periodic audits aimed at monitoring the application of the principles set out in this Policy and the appropriate management of any report and violation.

- *Remedy of human rights violations*

Should any breaches of the human rights principles set out in this Policy occur, the Group is committed to implementing appropriate processes to remedy any negative impacts on workers, clients and communities it may have caused, either directly and indirectly. The Moncler Group is also committed to collaborate with competent national and international entities and institutions, as well as with its suppliers and partners, to ensure the adequate resolution of those issues. Furthermore, the Group also expects its suppliers and business partners to take responsibility for implementing appropriate processes to mitigate and remedy any negative impact resulting from a human rights violation incurred in the performance of their activities.

With respect to its supply chain, the violation of the principles set forth in this Policy, outlined in the Code of Ethics and the Supplier Code of Conduct, constitutes a breach of contract and may result in targeted intervention actions, application of penalties, and the termination of the contract. Where less serious violations are concerned, the Group supports its suppliers in achieving greater awareness and requires the implementation of corrective plans within the established deadlines and whose implementation will be assessed through dedicated audits.

As regards internal operations, the Group undertakes to promptly analyse all reports collected through internal controls, surveys, or whistleblowing channels, possibly requiring the support of external consultants. In relation to the seriousness of the incident, immediate measures are put in place, up to termination of the contract with the employee, or with the collaborator if found to have behaved inappropriately.

- *Reporting*

The Moncler Group annually publishes the Non-Financial Statement, drawn up in compliance with Article 4 of Italian Legislative Decree 254/2016 which contains information on environmental, social, and governance topics. This information is intended to deliver a clear understanding of the activities carried out by the Group, their impact, and the commitments for the future. In particular, the Group integrates

the document with a disclosure of the activities related to the due diligence processes, of their implementation status and results, and how identified impacts are addressed.

- *Training*

Recognizing that compliance with the principles set out in this Policy depends on deep understanding by those who have to put them into practice on a daily basis, the Moncler Group is committed to providing training and raising awareness on these topics, also in collaboration with the International Training Centre of the ILO (ITCILO), involving its employees, suppliers, and business partners.

An update on the main findings of the processes described above is shared periodically among the Group's relevant and affected departments, the Strategic Committee⁷ and the Control, Risk and Sustainability Committee. As a result of these moments of sharing, the Group is committed to implementing improvement programs, which may also include possible revisions of some aspects of the business strategy.

Roles and responsibilities

The Board of Directors of Moncler S.p.A., having received the favourable opinion of the Control, Risks and Sustainability Committee, is the body responsible for the approval, adoption, and supervision of compliance with this Policy by the Moncler Group.

The Control, Risks and Sustainability Committee assists the Board of Directors in carrying out the tasks related, also with overseeing sustainability topics linked to the conduct of business activity and the interactions with stakeholders, through the definition of the strategic sustainability guidelines and the relevant action plan (Sustainability Plan), which also includes targets and projects concerning human rights.

Several Group departments contribute to the operational management of human rights issues, including, in particular:

- The *Sustainability Unit*, which monitors and reports the Group's environmental and social impact, by providing guidelines for sustainable development that also take into account the respect of human rights, internally and at its suppliers, communities and in the relationships with clients and all stakeholders with which the Group establish business partnerships;
- The *Legal Affairs Function*, which is tasked with the management and protection of legal aspects, the management of contracts with suppliers and business partners, as well as providing legal assistance to other departments on various topics, including human rights;
- The *People & Organisation Function*, which ensures the proper management of people working in the name and/or on behalf of the Group, also with regard to human rights and workers' rights
- The *Operations & Supply Chain Function*, which is responsible for supply chain management and, therefore, for maintaining relations with commercial partners and suppliers, as well as in the field of human rights protection.
- The *Internal Audit Function*, which carries out risk assessment as well as internal and external audit activities (also through third parties), including with regard to compliance with this Policy, the Code of Ethics and the Supplier Code of Conduct, and manages internal and external reports on alleged irregularities and the subsequent implementation of actions to mitigate and remedy potential human rights violations.

The Moncler Group has a remuneration system designed to incentivize all functions and people (including the Chairman and Chief Executive Officer and the executive directors) involved in the implementation of the goals of the Strategic Sustainability Plan, which also includes several targets related to improving human rights management in the company and along the supply chain.

⁷ The Strategic Committee assists the Chairman and Managing Director in an advisory capacity, supporting him on a continuous basis in the definition and implementation of strategies and carrying out the task of linking the main strategic areas of the Company and the Group, ensuring consistency and agreement with Moncler's founding values, namely uniqueness, exclusivity, transversality, quality, and innovation. The Strategic Committee's functions include the review of the Business Plan and the Sustainability Plan and all strategic decisions including, but not limited to, the ones related to the development of the distribution network, marketing plans, investments, entry into new markets and environmental and social initiatives.

Grievance mechanisms

Anyone who is aware of an actual or suspected violation of the applicable law, or principles of the Policy, must report it promptly. These situations include breaches by employees, consultants, partners, agents, suppliers, or anyone acting on behalf of the Group or of a Group supplier.

Reports can be made 24 hours a day, seven days a week, from all over the world, through the web page [Moncler.ethicspoint.com](https://moncler.ethicspoint.com), available also in the sections dedicated to whistleblowing within the corporate website, or via a letter addressed to the Moncler headquarter (Industries S.p.A. - Whistleblowing, Via Solari 33, 20144, Milan, Italy) or through dedicated phone lines operated by a specialized external provider, with coverage in 40 countries, by native-speaking operators.

Policy updates

This Policy is reviewed and updated periodically according to the results of risk assessments, in accordance with international best practice, of the evaluations of the Control, Risk and Sustainability Committee, as well as on the basis of dialogue with internal and external stakeholders.

This is the updated version of the Policy, whose first version was approved by the Board of Directors on 28th February 2023.

Annex 1: Group's system of human rights policies and procedures

In addition to this Policy, the Group has formulated and implemented several other policies and procedures covering specific aspects of the management of the human rights principles expressed in this document, and in particular:

Principles for human rights respect	Other Group policies and procedures
Prohibition of child labour	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure
Prohibition of any form of forced and compulsory labour, and of human trafficking	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure
Prohibition of any form of discrimination and promotion of Diversity, Equity and Inclusion	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure• Personnel Recruitment Policy• The Board of Directors' and the Board of Statutory Auditors' Diversity Policy
Respect of minorities and of indigenous people	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure
Recognition of workers' freedom of association and of right to collective bargaining	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure
Protection of health and safety	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure• Health and Safety Management Policy
Promotion of fair remuneration	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure• Remuneration Policy
Promotion of work life balance	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Whistleblowing Procedure• Health and Safety Management Policy
Fight against corruption	<ul style="list-style-type: none">• Code of Ethics• Whistleblowing Procedure• Anti-Corruption Policy
Responsible advertising and marketing	<ul style="list-style-type: none">• Code of Ethics• Whistleblowing Procedure• Ethical Marketing and Advertising Policy
Protection of privacy and of data security	<ul style="list-style-type: none">• Code of Ethics• Privacy Policy• Cookie Policy
Respect and protection of the environment	<ul style="list-style-type: none">• Code of Ethics• Supplier Code of Conduct• Environmental Policy