

MONCLER

GROUP

CALIFORNIA
MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2024

Introduction

This document was approved by the Board of Directors of Moncler USA Inc on 12 June 2025 and describes the measures taken to ensure that no form of forced labour or child labour exists within the Company or at any point in its supply chain, as required by the California Transparency in Supply Chain Act of 2010. The contents of this statement refer to the financial year ended 31 December 2024 and details the measures taken by the Company and by its parent company Moncler S.p.A. in respect of the wider Moncler Group (as defined below).

Moncler USA Inc is a subsidiary of Moncler S.p.A., the parent company of the Moncler Group (hereinafter referred to as the “Group” or “Moncler Group”) which has always been committed to conducting its business with professionalism, adopting ethical and virtuous conduct and totally condemning any form of human rights abuse. In particular, the Moncler Group is committed to fighting any form of forced labour or child labour, both within its organisation and along its supply chain, in line with the principles set out in the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

At the Moncler Group, excellence means quality, style and innovation, but also a commitment to promote a supply chain that is attentive and respectful of workers’ rights, of animal welfare, and of the environment. The Group believes in the value of stable relationships, based on trust and cooperation, and prefers long-term relationships with suppliers that are reliable producers and share Moncler Group’s values.

Company profile

The Moncler brand, born in 1952 in Monestier-de-Clermont, a small village in the mountains near Grenoble, with a focus on sports clothing for the mountain, since 2003 took on an even more distinctive and exclusive style, evolving from a line of products used purely for sport purposes to versatile lines that clients of all gender, age, identity and culture can wear on any occasion and where outerwear, while being the brand's identifying category, is gradually and naturally integrated with complementary products. Moncler pursues a philosophy aimed at creating products that are unique, of the highest quality, versatile and constantly evolving while always remaining true to the brand’s DNA guided by the motto “born in the mountains, living in the city”. Moncler was listed on the Italian Stock Exchange operated by Borsa Italiana S.p.A. in 2013 and completed the set-up process at the production site in Romania in 2016, with the aim of vertically integrating part of its production and creating an industrial and technological R&D hub for down jackets.

On April 1st, 2021, the Moncler Group was established. With its two brands – Moncler and Stone Island – the Group bases its strategy on four main strategic pillars: being the expression of a concept of luxury that goes beyond traditional stereotypes and that interprets developments in the cultural codes of the new generations; continuing to fully exploit the potential of its Brands globally; developing an omnichannel model that combines a direct relationship with the consumer and strong digital integration; and, lastly, promoting sustainable growth, embedding sustainability into its

business model and creating value for all stakeholders.

The Moncler Group distributes the collections, always in compliance with applicable local legislation, in over 70 countries through a network that includes directly operated physical and digital stores, selected multi-brand retailers, shop-in-shops within department stores and airports, and online luxury multi-brand retailers (e-tailers).

Over the year, the Group, which recorded total revenues of over €3.1 billion, achieved growth in all the regions where it operates, further strengthening the link with its communities, through targeted campaigns and dedicated events. The international presence of the Moncler Group is reflected in the distribution of its employees. The EMEA Region, including Italy, hosts the majority of the workforce, with 5,429 employees (66% of the total), due to the presence of the corporate headquarters of Moncler and Stone Island, in addition to the Moncler production site in Romania, which alone represents 24% of the workforce of the entire Region. In the Americas Region, the Group employs 576 employees (7% of the total), and 2,170 in Asia (27% of the total).

Supply chain profile

During 2024, the number of suppliers involved in the production of Group product amounted to 589¹, showing a slight decrease compared with the previous year due to increasing synergies and the partial internalisation of production and are divided into four main categories: raw materials, façon manufacturers, finished products and services. The majority of suppliers (approximately 90%) are located² in the EMEA Region, primarily in Italy (around 71% of the total). In terms of supplier concentration, the top 40 suppliers account for more than 50% of the value of orders.

The heterogeneity of suppliers, their geographical distribution, the nature of certain processing and services, and the seasonal variability of production could lead to potential negative impacts on workers in the supply chain on issues related to human rights (such as forced or child labour, the right to collective bargaining, etc.), inadequate labour standards (management of contracts and working hours, wages, occupational health and safety systems, etc.) and employment stability. These impacts could translate into potential reputational risks for the Group. To address these challenges, the Group has been dedicating significant resources for years to the prevention and monitoring of potential violations of applicable laws, as well as its own standards, along the supply chain. In this context, the traceability process has been important enabling an increasingly detailed understanding of the supply chain while simultaneously establishing a structured due diligence system, with a particular focus on those who might be in situations of greater vulnerability. Since 2023, the Group has tracked, at a regional level, over 80% by volume of each of the following materials: nylon, polyester, cotton, and wool fabrics and yarns, in addition to the 100% traceability already achieved for down raw material since 2015.

¹ Excluding suppliers with sales order of less than 1,000 Euros per year.

² Percentages calculated on the number of suppliers.

For more information regarding the supply chain profile and the management of relationships with suppliers and sub-suppliers, please refer to chapters SBM-1 (pages 71–74) and S2 (pages 198-209) of the 2024 Consolidated Sustainability Statement (section of the 2024 Annual Report), available on the Group's website www.monclergroup.com under the "Sustainability/Documents" section.

Due diligence process

To ensure proper and responsible management of workers throughout the value chain, the Group has adopted an integrated due diligence system in line with the OECD (Organisation for Economic Co-operation and Development) guidelines, which includes: embed responsible business conduct principles into policies and management systems; identify and assess risks and actual and potential adverse impacts; prevent and mitigate adverse impacts; provide for, or cooperate in remediation; track implementation and results, and communicate how impacts are addressed and training. In particular, the due diligence process covers the verification of compliance with all human rights recognised in the Group Human Rights Policy, including, among others, the prohibition of forced labour, child labour, all forms of discrimination and human trafficking, freedom of association and the right to collective bargaining, the promotion of fair wages and working hours and the protection of occupational health and safety. It also extends to environmental issues such as climate change, biodiversity and water consumption. This process is constantly strengthened and updated in view of emerging regulations. A detailed description is provided below:

- a. **The Group's policy system.** The Moncler Group has adopted specific internal policies to ensure and promote transparent, responsible management of its value chain in all the countries in which it operates, and to manage or mitigate theoretical risks and potential negative impacts. Those policies include:
 - The **Codes of Ethics** of the Moncler brand and the Stone Island brand encompass the set of values that both Brands recognise, share and also promote with all partners in the knowledge that conduct inspired by principles of diligence, honesty and loyalty is an important driver of economic and social development. Employees and collaborators are required to act with honesty and integrity and to build relationships with stakeholders based on mutual trust, so that growth is guided by the principle of shared value. In particular, through the Codes, the Group is committed (and requires its partners to make the same commitment) not to knowingly entertain, either directly or indirectly, relations of any kind with persons who in any way violate the regulations on the fight against child and forced labour as well as the protection of health and safety.
 - The Group's **Supplier Code of Conduct** sets out expectations for how partners should operate. It consists of six sections (Labour and Human Rights - which includes a prohibition of any form of forced and child labour -, Health and Safety, the Environment, Animal Health and Welfare, Product and Service Safety and Quality, and

Business Ethics) and contains the mandatory requirements that suppliers must comply with in order to begin or continue working with the Group including the prohibition of any form of forced and child labor.

- The Group's **Human Rights Policy**, which is an integral part of the Code of Ethics and is prepared with the technical support of the International Labour Organization (ILO), defines the principles underlying the Group's commitment to respecting and promoting fundamental human rights and preventing or mitigating any negative impact of its activities through an approach based on risk assessment criteria at all levels of its value chain.

These documents are inspired by the main laws, regulations and national and international standards in the field of corporate social responsibility, corporate governance, human rights and environmental protection, such as the International Bill of Human Rights of the United Nations, the Universal Declaration of Human Rights and the Charter of Fundamental Rights of the European Union, the decent work standards set out in the conventions of the International Labour Organization (ILO), the OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development, the Ten Principles of the United Nations Global Compact, etc..

Codes and policies are periodically updated to respond to stakeholder needs and expectations, to ensure alignment with international best practices, and to integrate them in light of emerging sustainability issues. The Group's Board of Directors is the body responsible for approving, adopting and supervising compliance with the documents described above. The documents are published, in Italian and English, on the monclergroup.com website in the "Sustainability/Documents" section.

All suppliers³, during the contractual phase, are required to sign the Code of Ethics, with its related Policies, and the Supplier Code of Conduct. By signing, suppliers commit to respecting its principles and ensuring that their own suppliers comply with them, as well as displaying these documents in the workplace to make them easily accessible to workers. Violating the Codes constitutes a breach of contract and can lead to specific sanctions, including termination of the contract, depending on the severity of the violation.

- Risk assessment.** The commitment to upholding the principles and guidelines that inspire the Group's operations starts with the early, preventive identification of actual or potential risks of violations of these principles throughout the supply chain. The risk analysis is carried out using various tools and applies to all entities within the value chain. It includes all the Moncler Group sites, existing and potential business relationships (e.g. mergers or acquisitions), potential and actual suppliers, sub-suppliers and their employees, including women, children, indigenous peoples and local communities, in any way connected to or affected by, directly or indirectly, the Group's activities.

³ Approximately 90% of significant Group contracts include compliance with the Brands' Code of Ethics (95% for Moncler).

In particular, every year, the Group, with the technical support of a specialised international partner, conducts a specific risk assessment of environmental impact and human rights violations. The analysis, carried out at country level, covers all stages of the production process. As a result of this project, the potential risk profile by geographical area for each of the main human rights was mapped, including decent wages, health and safety at work, discrimination in the workplace, child labour, forced labour, inadequate working hours, human trafficking, migrant workers, freedom of association and collective bargaining.

Also in 2024, the theoretical risk assessment analysis confirmed that the services and production processes carried out by the Group at directly managed sites do not present a significant risk profile for any potential human rights violations, while those managed by the Group's direct suppliers and their supply chains are characterised by diversified levels of risk. In particular, the stages of the chain relating to cotton cultivation and the intermediate processing of the finished product might potentially be characterised by higher risk profiles than the other stages. For this reason, for years the Group has implemented structured monitoring and prevention processes aimed at mitigating these risks throughout the entire supply chain. Among the human rights analysed within the supply chain, ensuring decent wages has emerged as one potentially at risk. Indeed, for years the Group has been committed to monitoring this issue through specific analyses on the living wage. Lastly, the country-level analysis revealed the presence of higher potential risks in Southeast Asian countries, where the Group's supply chain has a very limited presence.

- c. **Prevention and mitigation of impacts.** The risk analysis process is essential to prevent negative impacts and define mitigation actions, such as prioritizing ethical-social and environmental audit plans and integrating the results into the selection process for new suppliers

The ethical, social and environmental audits are in fact carried out both on potential suppliers, to assess their suitability for establishing a business relationship with the Group, and on existing suppliers to verify ongoing compliance with applicable laws and the principles outlined in the corporate Codes. For the latter, any violation of the Group's requirements constitutes a contractual breach, granting Moncler and Stone Island the right to request the immediate termination of the existing contract in the event of serious non-compliance or, in less severe cases, the implementation of a timely corrective action plan.

In order to ensure maximum impartiality, audits are regularly entrusted to qualified, accredited third-party entities with recognized expertise. The audits, regarding social aspects, focus on verifying respect for fundamental human and labour rights, with particular attention to the issues of forced labour, child labour, human trafficking, freedom of association, working hours, guaranteed minimum wage, and, not least, health and safety. The Group's proprietary checklist, used to perform audits, is regularly updated to take account of changes in reference standards and local and international regulations. It was developed based on a benchmarking analysis of major industry-recognised and multi-stakeholder standards and methodologies,

including SMETA⁴, the Responsible Business Alliance, amfori BSCI⁵ and other management systems and international initiatives. This tool has been subsequently adapted to the specificities of the Group's supply chains and is periodically reviewed with the technical support of the International Labour Organization (ILO) and certification and consulting companies (including SGS, Control Union, IDFL and KPMG). With particular reference to forced and child labour, through the checklist used during the audits, the Group verifies - among other things - the adoption of adequate mechanisms for verifying the ages of employees and contractors; the correct handling of workers' identification documents; and the compliance with working conditions that are appropriate and in line with local regulations; etc.

The Group has a three-year audit plan that ensures all façon manufacturers and finished product are audited at least once every three years, unless the risk assessment process highlights the need to increase the audit frequency.

In 2022-2024, Moncler conducted 794 ethical, social and environmental audits (on both suppliers and sub-suppliers), accounting for 100% of the volumes assigned to outerwear façon manufacturers, 93% of the volumes assigned to suppliers of other outerwear processes (dye houses, printing works, embroideries, etc.), 100% of footwear and bag suppliers, 88% of tanneries, 97% of volumes assigned to knitwear suppliers and soft accessories suppliers and 96% of the 2024 turnover of pattern making and prototyping suppliers.

Stone Island, which has a three-year ethical, social and environmental audit plan to ensure the highest coverage of suppliers in its supply chain, also carried out 380 ethical, social and environmental audits during the same three-year period (on both suppliers and sub-suppliers), equal to around 100% of the value of orders assigned to finished products suppliers and 99% of the value of orders assigned to façon manufacturers.

Moreover, in 2024, both Brands also conducted ethical, social and environmental audits on their main raw materials suppliers representing 75% of total material purchases for Moncler and 90% for Stone Island. In particular, with regard to the down supply chain, 100% of Moncler's suppliers were also found to comply with the human rights and environmental compliance modules officially included in the DIST (Down Integrity System & Traceability) Protocol, which regulates farming standards, respect for animals, down traceability, and down technical quality. The same environmental and social modules have also been applied to the verification processes for Stone Island's suppliers of RDS-certified (Responsible Down Standard) down.

In addition, ethical, social and environmental audits also continued to be carried out on strategic service suppliers: logistic and quality control platforms, providers of services at Group offices and stores for which no significant non-compliances were identified.

⁴ Sedex Members Ethical Trade Audit.

⁵ The BSCI (Business Social Compliance Initiative) is a program of Amfori that provides a framework aimed at improving working conditions within global supply chains.

In 2024, with the ongoing goal of preventing impacts on suppliers' workers and, at the same time, the potential risks for Moncler and Stone Island, the Group's procedure applied to the selection process for new suppliers was updated. The evaluation of a new supplier involves an on-site visit conducted by the quality team to assess the supplier's alignment with the Group's quality standards. After this technical analysis, the evaluation process for new façon manufacturers and new finished products suppliers involves a document review of compliance and financial aspects as well as a preliminary ethical, social and environmental audit carried out by a third party. For raw material suppliers, instead, the process requires the filling in of an environmental and social assessment questionnaire supported by documentary evidence followed by an on-site audit. The Group thus commits to not include in its supply chain companies that do not comply with Moncler and Stone Island's quality standards and basic ethical, social, and environmental principles.

Within the scope of the actions implemented by the Group to prevent potential negative impacts along the supply chain, with reference to wage practices, starting from 2021 the Group, with the support of a third party, conducts specific assessments on living wage for both its own corporate sites and its suppliers, with the aim of covering 100% of its "critical suppliers" by 2025. In particular, Moncler partners with the Fair Wage Network, an independent organisation dedicated to progressing fair wage practices across global supply chains.

Moreover, Moncler is also updating its vendor rating system by including new social and environmental indicators with the aim of providing an overall assessment of the supplier that takes due account of sustainability aspects. Each indicator will be weighted, contributing to the assessment of each supplier based on scores achieved in different macro-areas: sustainability and compliance, quality, deliveries and service level, cost, innovation and financial sustainability.

Regarding indirect suppliers, i.e. suppliers of goods and services not related to the product, since 2018 a qualification process has been in place to gather information about the organisation, the financial-economic situation, and the social and environmental practices of these suppliers.

Lastly, at Group level, a whistleblowing system is in place, which can be used by suppliers and their employees to report any unlawful behavior or non-compliance with laws, regulations, and the principles set out in the two Brands' Codes of Ethics. The purpose of this system is to effectively manage and quickly detect any illegal and unethical conduct and action that do not comply with the rules, regulations, internal procedures, and value principles, and to adopt the appropriate measures while ensuring the anonymity of the whistleblower. Any stakeholder, whether internal or external to the Group, who, in good faith, reports an anomalous behaviour, alleged or actual violation of the Code is protected from retaliation, discrimination or penalisation.

- d. **Remedy of human rights violations.** If audit activities reveal violations of applicable laws or

principles set out in the Group's Codes and Policies, the Company requires the supplier to implement appropriate actions to resolve the non-compliance appropriate processes to mitigate and remedy any negative impact resulting from a human rights violation incurred in the performance of their activities.

Notwithstanding the zero-tolerance approach for major breaches, for which the Group reserves the right to terminate immediately the existing contractual relationship with the supplier, both Brands are committed to support their supply chain raising awareness and driving continuous improvement, requiring the implementation of corrective actions where needed. Following each audit, an improvement plan is issued and its implementation is then verified. The Group undertakes to proactively support all suppliers in implementing the agreed corrective actions.

In order to verify that corrective measures are effectively implemented by the agreed deadline, the Group carries out both on-site and documentary follow-up audits.

With regard to the 546 suppliers sites audited on ethical, social, and environmental aspects in 2024, by the end of the year approximately 94% of them were in line with the highest Group's social and environmental standards (more than 95% when considering "critical suppliers"). Relationship was terminated with around 3% of them (16 suppliers), and the remaining 3% turned out to have open non-compliances at the end of 2024, as the audit activity took place just before the last months of the year and not all the actions aimed at remediating the non-compliances had been closed.

With particular reference to social aspects, in 2024, 104 of the 546 audited sites were found to have non-compliances and the relative improvement plan was issued. The main areas of non-compliance were related to occupational health and safety (73%) followed by labour relationship management issues (23%), which included non-compliance regarding salary and wage treatment (11%), working hours (6%) and employment contract management (6%). Only 4% of the cases involved human rights-related issues. For least critical non-compliances, it was agreed with the suppliers to promptly implement a resolution plan, while in the most critical cases, the collaboration with the supplier was always terminated.

Finally, the Group examines each situation to assess whether any non-compliance identified has resulted in negative impacts on workers; in the event of proven negative impacts, the Group verifies whether or not these fall within the scope of its responsibility assessing their correlation with the performance of its activities. If such a correlation exists, the Group takes appropriate measures to remedy the impacts on workers in the value chain, collaborating, where necessary, with the competent authorities at national and international level and with its suppliers and partners to adequately address these situations. The Group also expects its suppliers and business partners to adopt mitigation and remediation measures for human rights violations in their activities, integrating these obligations into their contracts.

Effectiveness of the mitigation actions implemented. The Group evaluates the effectiveness of the measures taken to address human rights violations along its supply chain based on the

results obtained through its due diligence tools. Specifically: i) the effectiveness of the Group's choices in implementing responsible procurement practices is verified based on the findings of the human rights violation risk assessment along the supply chain; ii) the effectiveness of the Group's ability to collaborate with partners aligned with its values and attentive to human rights is determined by the results of ethical-social and environmental audits conducted on suppliers; among other things, during these audits, dedicated interviews with supplier employees are conducted to verify various aspects related to working conditions, particularly the workers' awareness of whistleblowing procedures; iii) lastly, from what emerges on the status of implementation of the mitigation actions agreed with suppliers to resolve any non-compliance identified during audits, the effectiveness of the support provided by the Group to suppliers in adopting corrective measures can be monitored.

- e. **Reporting.** Moncler Group annually publishes information related to environmental, social, personnel, human rights and anti-corruption issues, aimed at delivering understanding of the activities carried out and their impact, as well as the performance and results of the Group, within public documents in accordance with international frameworks and standards. In particular, starting from 2025, this information will be highlighted in the Consolidated Sustainability Statement prepared in compliance with Legislative Decree no. 125 of 6 September 2024 and the European Sustainability Reporting Standards (ESRS), which constitutes a section of the Annual Report. 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.
- f. **Training.** The Group places great importance to dialogue and sharing good practices with its suppliers, both in the technical field for the benefit of business activities, and in the social and environmental field, to promote responsible behaviour. The Sustainability Unit, the Operations & Supply Chain Department and the Internal Audit Function work closely together to ensure continuous engagement throughout the supply chain. This engagement takes place through multiple channels, ranging from informal periodic meetings to more structured institutional occasions. To further strengthen this relationship and simplify the exchange of information and documentation, a dedicated web portal is available for the Group's suppliers.

Through the portal, the supplier can directly access communications and documents, including the Code of Ethics, Supplier Code of Conduct and related guidelines. In particular, a training course on the Code of Ethics was added to the portal in 2022. The training course includes an ad hoc section on human rights principles. Moreover, the Group, with the support of the International Training Centre of the International Labour Organization (ITC-ILCO), continued to offer targeted human rights training to both its employees and suppliers. The course is translated into all languages relevant to the Group and is updated annually. Capacity-building programmes have also continued on key topics such as the living wage and on the importance of adopting energy efficiency mechanisms and promoting renewable energy throughout the supply chain, involving a total of 41 among the Group's main suppliers during the year.

Lastly, the Supply Chain and Procurement departments are regularly involved in training activities where the results of the assessments of the risk of human rights violations along their supply chain are shared and during which the steps of the procedure to be followed for the various types of suppliers were reviewed. During these sessions, suggestions for improvement were collected in order to make the process increasingly effective.

For further details regarding the governance and approach the Group adopts to address forced and child labor and the various stages of the due diligence process, please refer to the Human Rights Policy, available on the website www.monclergroup.com under the 'Sustainability/Documents' Section. In this Policy, Moncler reaffirms its commitment to promoting responsible business management at all levels of its production chain, while respecting and contributing to the protection of individual rights, including the prohibition of child labor and all forms of forced labor.

Commitments for the future

The Moncler Group is committed at all times to running its business responsibly and condemns all forms of modern slavery. The Group will continue to work pro-actively to find new ways and tools to encourage respect for human rights, even outside the company, by sharing its values and principles throughout its supply chain.

This statement was approved by the Board of Directors of Moncler USA Inc on 12 June 2025 and is therefore signed by:

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end.

Tommaso de Vecchi

(President and Director)