HUMAN RIGHTS POLICY



PRADA Group

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- 1. Introduction

The Prada Group (the "Group" or "Prada") – a universe composed of a multitude of cultures, ethnic groups, religions and personal orientations – firmly recognizes that business can only flourish in societies characterized by the respect and the safeguard of human rights.

As stated in the Group's Sustainability Policy, approved by the Board of Directors of Prada S.p.A. on March 15, 2019, Prada commits to operate in full respect of the value of the individual and for the human and workers' rights. The Group acknowledges its responsibility to respect human rights and commits itself to a proactive approach to advancing these rights. The publication of this Human Rights Policy (the "Policy") is an important opportunity for officially setting the guidelines and principles the Group puts in place to protect and uphold human rights within its boundaries and along its value chain, defining the human rights principles to be protected, the main responsibilities and an implementation strategy.

- 2. Our Commitments

The Group considers the respect for ethical principles to be a main requirement for the business' success, considering also the impact that ethical issues could have on its image and reputation. The Group's activities are governed by its Code of Ethics and are carried out in accordance with legislative and regulatory provisions in all countries in which it operates. In case national laws are less strict than international standards on human rights issues, the latter are taken as a point of reference. The principles related to the respect of human rights to which the Prada Group commits refer to the following:

- The United Nations (UN) International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- The International Labour Organisation (ILO)
 Fundamental Conventions;
- The International Labour Organisation (ILO)
 Declaration on Fundamental Principles and Rights at Work;
- The United Nations (UN) Guiding Principles on Business and Human Rights;
- The United Nations (UN) Global Compact;
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

— 3. Scope of application

This Policy is applicable to all business activities carried out by Prada S.p.A. and its subsidiaries worldwide. The Prada Group is committed to respect all human rights not only within its own operations, but is also committed to promote the adherence to the same human rights principles among its contractors, suppliers and business partners.

The Group expects its business partners to respect the principles and content of its Human Rights Policy and makes all reasonable efforts to include contractual obligations to respect human rights into its agreements with them when working for or together with Prada.

- 4. Our Principles

Through this Policy, Prada reaffirms its effort and responsibility to uphold human rights by acting in accordance with the Principles described below:

Prohibition of child labor

The Group considers unacceptable any form of child labor in its operations. The Group prohibits the employment of young workers who are less than 15 years of age or under the age for completion of compulsory education, whichever is higher. In addition, Prada strictly forbids the involvement of young workers under the age of 18 in hazardous work or under difficult conditions, such as long hours or working at night.

Freedom from forced labor, including modern slavery and human trafficking

The Group strictly prohibits forced labor, including but not limited to modern slavery and human trafficking, under any circumstances. Prada recognizes its responsibility, and pays particular attention to more vulnerable workers, such as international or internal migrants or illiterate workers, since their exposure to these risks is higher.

Freedom of association and collective bargaining

The Group recognizes the right to collective bargaining and to exercise freedom of association of employees. In particular, employees are entitled to the rights to form, participate and organize trade unions to their own will, without fearing to be discriminated, intimidated or retaliated against.

The Group commits to engage in open and constructive dialogue with representatives of recognized trade unions, negotiating fairly to ensure mutual success.

Non-discrimination, diversity and equality of opportunity

The Group firmly believes that diversity and inclusion are valuable sources of inspiration for its work and, more in general, are instrumental to the enrichment of progress in terms of culture and wellness to be shared with its stakeholders. Therefore, Prada has no tolerance for any form of discrimination in the workplace. Moreover, the Group encourages diversity and inclusion within its workforce, ensuring equal opportunity and equal treatment to all its employees, regardless to their race, ethnicity, nationality, religion, disability, gender, sexual orientation and political orientation.

Ensuring a working environment free from harassment

The Group wants to guarantee its employees a healthy working environment, ensuring that employees are treated with dignity and respect and are not subjected to harassment or violence. All forms of violence and harassment in the workplace are strictly prohibited, including physical abuse, verbal abuse and sexual harassment.

Fair wages and benefits

The Group recognizes the contribution of its employees by offering a fair level of remuneration, which reflects the knowledge and skills of each individual, avoiding personal bias. The Group's salaries are at least the same level as the minimum wage required by national laws and shall represent a living wage for Prada's employees.

Working hours

The Group is aware of the importance of work-life balance for its employees, recognizing their right to rest; moreover the Group is aware that long working hours could increase injuries in the workplace. The Group complies with international and local regulations concerning working hours limits both on a daily and weekly basis. In any case, the sum of the normal working week and overtime hours usually shall not exceed the limits fixed by local labor laws, as well as international labor regulations, unless there are exceptional circumstances. Specifically, overtime shall be included in employment contracts and shall be done on voluntary basis. Nevertheless, Prada guarantees to its employees at least one rest day in seven consecutive working days in accordance, unless there are exceptional circumstances. Collective Bargaining Agreements may provide specific rules to handle peak periods of production or fashion show organization in terms of working hours and define proper compensation to workers.

Right to occupational health and safety

The Group concretely encourages responsible, conscious behavior regarding health and safety according to the highest standards and in full compliance with local and international regulations. Prada is committed to promoting and safeguarding the health and safety of employees and all other workers that are under the operational control of the Group. To support this commitment, Prada ensures to all its employees appropriate training on health and safety regulations.

— 5. Our implementation strategy

Monitoring and implementation (Due Diligence)

In order to ensure compliance with this Policy, the Group commits to set up periodical risk assessment to actively assess and avert potential human rights issues in its operations.

Employees who are aware of perceived violations of this Policy should immediately report the incident to the dedicated hotline. The Prada Group adopted a web platform (Whispli) managed by a specialized third party, and available in several languages, which ensures full compliance with international privacy regulation and makes possible for the whistleblower to choose anonymity.

Other reporting channels are:

- ordinary mail: Via Antonio Fogazzaro 28, 20135 Milan, Italy (K.a. Internal Audit)

Any allegation of a human rights violation brought through the hotline will be promptly investigated by an Ethics Committee. In handling such reports, Prada will act to safeguard the reporting parties against any form of retaliation. According to the nature of the grievance, internal departments may be involved in the investigation process. Prada reserves the right not to investigate grievances out of the scope of this Policy or lacking sufficient evidence.

— 6. Communication and training

The Group aims to strengthen human rights values within the organization, for this reason is committed to disseminate human rights principles to its employees through internal communication and with dedicated trainings. This Policy is available on the Group's corporate website.

— 7. Governance

On July 28, 2022, Prada S.p.A. Board of Directors has approved this Human Rights Policy. The Sustainability Committee within the Board, along with the CSR team, will oversee the periodical update of the Policy while the HR department is responsible for monitoring Policy compliance within the Group's own operations.

Always on July 28, 2022, Prada S.p.A. Board of Directors also approved a new Code of Ethics. This new version is a Charter of Values, which further enhances Prada's commitment to respect its people and the human rights.

The Group is also committed to regularly disclosing information about its human rights objectives and progress, to ensure full transparency related to its impact on human rights topics.

- 8. Looking Forward

The Group will continually evaluate and review how best to strengthen its approach to addressing Human Rights. The Group promotes the importance of participating in external initiatives and partnerships, for example with other industries, NGOs, trade unions, suppliers, and other business partners, to address the same challenges.