

SUPPLIERS CODE OF
CONDUCT

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ACT

PRADA GROUP'S PURPOSE

With a thoughtful and pioneering vision, the Prada Group is a global leader in luxury.

We own some of the world's most prestigious brands:

Prada, Miu Miu, Church's, Car Shoe, Marchesi 1824 and Luna Rossa.

By being

DRIVERS of CHANGE,

we offer an unconventional dialogue and interpretation of the contemporary, as expression of our way of doing business for PLANET, PEOPLE and CULTURE.

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— 1. Introduction

The Prada Group (the "Group" or "Prada") operates according to principles of integrity, honesty, fairness and transparency, in full compliance with applicable laws and regulations, striving, where possible, to set higher standards with respect to the different regulatory scenario it has to refer to in the more than 40 countries where it operates.

The Prada Group's strategic choices have always been guided by a desire for lasting success that benefits all its stakeholders, be they shareholders, employees, customers, suppliers or the communities where it does business. Sustainability and a constant and transparent dialogue with its stakeholders are key elements for reaffirming the Group's identity and sustaining its competitive capacity, as well as for facing contemporary and future changes and challenges and ensuring long-term inclusive growth.

For the Prada Group, business relationship choices are key to achieving not only the highest standards of quality and product excellence, but also to creating value in the medium and long-term.

The Group strongly believes that the implementation of its strategy and sustainable growth is only possible through the involvement of its suppliers.

In line with the Group's public commitments on sustainability, this Suppliers Code of Conduct (hereinafter also referred to as the "Code") aims to define the ethical, social and environmental standards applicable to the Group's business partners, even in cases where the reference legislation is less stringent.

The Code is a direct expression of the fundamental values described in the "Code of Ethics" and, in continuity with the "Human Rights Policy" of the Prada Group¹, it incorporates the principles expressed in the following documents:

- **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 Organization (ILO) Fundamental Conventions;**
- **The International Labour Organization (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;**
- **The United Nations Fashion Industry Charter for Climate Action of the Framework Convention on climate change (UNFCCC).**

¹ Both the Code of Ethics and the Human Rights Policy were approved by the Prada S.p.A.'s Board of Directors and are available on the www.pradagroup.com institutional website. Prada S.p.A. has also adopted compliance models such as the Organisation, Management and Control Model pursuant to Legislative Decree 231/01 concerning the administrative liability of entities.

— 2. Scope of application

This Code applies to the Group's business partners, i.e. any entity supplying products and/or services to the Group (the "suppliers"). The observance of the principles and standards contained in this Code is a prerequisite for starting and/or maintaining a business relationship with the Group, regardless of express provisions between the parties.

Suppliers shall also ensure that their sub-suppliers used with reference to the business relationship with the Group (hereinafter referred to as "sub-suppliers") also comply with the requirements set by this Code.

— 3. Principles

3.1 Business ethics

Group suppliers are required to operate in compliance with the principle of legality, of applicable domestic and international rules and regulations, including but not limited to laws preventing and fighting corruption and money laundering, as well as protecting competition.

Group suppliers are required to prevent and counter any actual or potential conflict of interest in support of the integrity of the Group's value chain.

In addition, suppliers undertake to protect the information and data disclosed to them, or to which they may have access in their business relationship with the Group, and not to disseminate, share or use them for purposes other than those concerning their relationship with the Group.

3.2 People

The Group is committed to operating with full respect for the value of the individual, human and labour rights. The Group recognises its responsibility to respect human rights and is committed to taking a proactive approach to promoting respect for these rights.

Therefore, Group suppliers are in turn obliged to operate with full respect for the value of people, human and workers' rights.

Prohibition of child labour

Group suppliers are required not to employ young workers who are less than 15 years of age or under the age for completion of compulsory education, whichever is the higher. They also undertake to avoid the involvement of young workers under the age of 18 in hazardous work or difficult conditions that may impair physical or mental health, such as long hours or working at night.

Freedom from forced labour, including modern slavery and human trafficking

Group suppliers are required not to use forced labour, including but not limited to modern slavery and human trafficking, under any circumstance.

In particular, the term "forced or compulsory labour" shall mean *"all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily"*, as defined in the ILO Convention on forced and compulsory labour of 1930 (no. 29).

Freedom of association and collective bargaining

Group suppliers are required to respect their employees' right to form, participate and organize trade unions to their own will, without fearing to be discriminated, intimidated or retaliated against. Suppliers are also required to undertake to maintain an open and constructive dialogue with representatives of recognised trade unions according to applicable regulations, negotiating fairly and respecting trade union role.

Non-discrimination, diversity and equal opportunity

Group suppliers are expected not to discriminate in the workplace ensuring equal opportunity and equal treatment to all their employees, regardless to their race, nationality, language, age, sex, gender, gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic condition, political or trade union opinion. Suppliers are also expected to support working conditions that promote diversity and inclusion.

Ensuring a working environment free from harassment

Group suppliers are required to guarantee their employees a healthy working environment, ensuring that they are treated with dignity and respect and are not subjected to harassment or violence of any nature, including physical abuse, psychological abuse, verbal abuse and any other form of sexual harassment.

Fair wages and benefits

Group suppliers are required to offer their employees a fair level of remuneration, which reflects each individual's knowledge and skills, avoiding personal and gender bias. Group suppliers are also required to pay salaries regularly, to remunerate overtime according to the law and to comply with all applicable statutory provisions on contribution. Salaries shall be at least the same level as the minimum wage required by national laws and shall represent a living wage for employees.

Working hours

Group suppliers are required to comply with local and international regulations on working time limits, including overtime, both on a daily and weekly basis, and to enforce them on their sub-suppliers. In addition, suppliers are required to provide employees with breaks and the minimum number of rest days established by applicable regulations, guaranteeing at least one rest day in seven consecutive working days, except in exceptional circumstances.

Right to occupational health and safety

Group suppliers are required to maintain responsible behaviour regarding health and safety, in accordance with local and international regulations, ensuring training and information on health and safety regulations to all their employees, as well as appropriate training on the type of activity carried out.

3.3 Planet

The Group adopts innovative solutions in order to progressively improve its environmental footprint, in line with the public commitments it has undertaken (e.g. The Fashion Pact): the efficient use of resources, the use of renewable energy sources, the responsible management of chemical substances in production processes, the reduction of waste, as well as the responsible use and traceability of raw materials are the key guidelines for this goal, also with a view to circularity. The Group requires that its suppliers,

in addition to complying with applicable environmental legislation, and consistently with the policies adopted by the Group itself, undertake to monitor and reduce its environmental impact.

Energy consumption and greenhouse gas emissions

Group suppliers are encouraged to measure greenhouse gas emissions related to their activities. Furthermore, the Group expects its suppliers to implement emission reduction plans through energy efficiency initiatives and self-production and/or purchase of renewable energy.

Water consumption

Group suppliers are encouraged to measure water consumption related to their operations. In addition, the Group expects its suppliers to implement plans to reduce water consumption through water recycling initiatives, especially for those suppliers using water-intensive production processes and for those located in water-stressed areas.

Water discharges and waste

Group suppliers are encouraged to measure the amount and destination of waste produced, including water discharges related to their operations. Furthermore, the Group expects its suppliers to implement waste reduction plans, minimising the amount of waste going to landfill. In the event that suppliers use chemicals in their production processes, they are required to at least ensure compliance with the regulations in force for wastewater flows.

Biodiversity, animal welfare and raw material traceability

Group suppliers share Prada's commitment to protect the environment and biodiversity, through a strategy of safeguarding the territory, promoting sustainable management of natural forests, and supporting activities to discourage deforestation. Furthermore, the Group expects its suppliers to comply with national and international standards on the protection of animal welfare and dignity, guaranteeing maximum welfare conditions at all stages of the animal's life. Suppliers of raw materials are required to guarantee the traceability of raw materials to ensure that the protection and conservation of biodiversity as well as respect for animal welfare are extended to all stages of the supply chain upstream.

— 4. Monitoring and implementation

Compliance with this Code shall be considered binding as well as any contractual obligations.

In order to be able to assess compliance with the provisions of this Code, the Group reserves the right to carry out periodic audits of its suppliers and sub-suppliers, also through external consultants, in order to verify compliance with the provisions contained herein.

In the event of an audit, the supplier undertakes to share with the Group and its designated persons all information and documents necessary for the purpose of the assessment and concerning business relations with the Group itself in a transparent and collaborative manner, as well as to facilitate any access to its own facilities or those of its sub-suppliers, ensuring that the latter also provide such information and documents.

These verifications will be the subject of an audit report by the Group. Prada reserves the right to share the results of such audits with its suppliers.

In the event of non-conformities found during audits, the supplier undertakes to formalise and implement corrective actions to remedy such non-conformities. The Group undertakes to support the supplier, with a view to continuous improvement, in devising and implementing corrective actions. Suppliers are aware that failure to comply with this Code, as well as failure to implement corrective actions aimed at overcoming the non-compliance found, may expose them to the risk of termination of their relationship with the Prada Group.

The Group has activated a whistleblowing system for any report concerning an alleged and/or ascertained violation of this Code, of the Organization, Management and Control Model pursuant to Law Decree 231/01 or of any contractual agreement with Prada Group companies. In particular, the Group has adopted a web platform accessible by everyone via the institutional web site www.pradagroup.com and available in several languages, which ensures the confidentiality of the identity of the whistleblower and the information contained in the report, in compliance

with applicable laws on personal data protection and whistleblower safeguard, making possible for the whistleblower to choose anonymity. Other reporting channels are:

— e-mail: whistleblowing@pradagroup.com

— ordinary mail: Prada S.p.A.,
Via Antonio Fogazzaro 28, 20135 Milan, Italy
(k.a.: Internal Audit)

Any breach of the Code reported through these channels will be promptly assessed by the Ethics Committee. In handling such reports, the Group will act to safeguard the reporting parties against any form of retaliation. In addition, the supplier undertakes not to carry out any retaliation or discrimination against personnel who have reported in good faith events that are considered to be unlawful. The Group reserves the right to terminate all relations with suppliers in the event of retaliation or discrimination by them against whistleblowers.

The Group invites its suppliers to adopt a whistleblowing system for the purpose of properly reporting actual or alleged violations of standards, national and international regulations, this Code and the ESG standards adopted by the Prada Group.

— 5. Looking forward

In order to ensure constant appropriateness and effectiveness of this Code, the Group reserves the right to revise its content and implementation on the basis of any regulatory developments, best practices and recommendations provided by stakeholders.

Finally, the Group encourages its suppliers to participate in events aimed at sharing best practices and standards on sustainability in the industry, including training activities, organized both by Prada and third parties. Any suggestions, opinions and comments on this Code can be sent by email to: csr@pradagroup.com.