

POLICY FOR COMBATING CHILD LABOUR

Salvatore Ferragamo

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1. PURPOSE OF THE DOCUMENT

Salvatore Ferragamo S.p.A. (hereinafter also the "Company") believes that the respect of human rights is an essential principle of the Company's culture and an unavoidable part of its social responsibility strategy.

The Company recognizes the crucial role of its employees who, through their work, are inextricably linked to Ferragamo's creations and commits to guaranteeing their careful management through the principles of correctness, integrity and respect. The respect for these values is required and promoted both in internal relations and within third parties relationships.

In this context, the Company has considered appropriate to develop the present Child Labour Policy (hereinafter also the "Policy") with the aim of further formalizing the commitment of the Company on said issue, in line with what declared in the Sustainability Policy. This document aims at preventing children and young workers from being exposed to situations that are hazardous or harmful for their physical and mental health, both inside and outside of the workplace.

The Policy defines the main Company commitments for the fight against child labour, also in relation to corporate processes concerning age verification during recruitment, the monitoring of the supply chain and potential remedial actions in case of the identification of workers below the age provided by applicable regulations.

2. RECIPIENTS AND SCOPE OF APPLICATION

This Policy applies to all Salvatore Ferragamo S.p.A. locations in Italy, including offices and stores, and is addressed to internal personnel, including employees, procurators, members of corporate bodies, and collaborators who work in the name of and on behalf of Salvatore Ferragamo (hereinafter "recipients"). The Policy also applies to interested parties for the sections specifically dedicated to them.

3. REFERENCE DOCUMENTATION

The Company commits to performing its activities with full respect of fundamental rights in relation to the rights of the child and the minimum age for work, as expressed by national and international conventions and regulations, including Company documentation.

Below a list of references is provided:

International references:

- Universal Declaration of Human Rights (UDHR) of the UN, art. 25 (child protection);
- UN Convention on the Rights of the Child (UNCRC)(Convention adopted by the General Assembly of the United Nations on November 20, 1989);
- ILO 138 Convention (Minimum age for admission to employment);
- ILO 182 Convention (Prohibition and immediate action to eliminate the worst forms of child labour);
- ILO 146 Recommendation (Minimum age for admission to employment - Convention application tool 138);
- ILO 190 Recommendation (Prohibition and immediate action to eliminate the worst forms of child labour);
- Application tool adopted by the ILO 182 Convention;
- UN Guiding Principles for Business and Human Rights;
- EU Directive 94/33/CE on the protection of young people at work.

National references:

- Italian Constitution, art. 34 and 37;
- National collective agreement and apprenticeship;
- SA8000 Standard;
- Law 17 October 1967, n. 977;
- Legislative Decree 345/1999;
- Legislative Decree 262/2000;
- Law 157/81;
- Law 176/91, art.28;
- Law 148/2000;
- Law 296/2007 (Financial Law 2007).

Company references:

- Code of Ethics of Salvatore Ferragamo Group
- Sustainability Policy of Salvatore Ferragamo Group
- Diversity & Inclusion Policy of Salvatore Ferragamo Group

4. OUR COMMITMENT

The Company condemns all forms and types of child labour and undertakes not to make use or support the use of child labour in any way, even along its production chain.

In particular, the Company undertakes the following:

- not to take advantage of or support in any way child labour, in line with what established by current legislation, the ILO Conventions on the subject and the International Convention on the Rights of the Child;
- comply with collective agreements and with the national law and regulations in force concerning labour rights;
- comply with national legislation on the protection of the needs related to student workers.

These tasks do not preclude, in line with current legislation, the implementation of the active participation and training initiatives described in paragraph 4.4 below.

Furthermore, the Company is committed to develop progressively initiatives aimed at promoting the culture of child protection and supporting the dissemination of these principles with interested parties, including their own supply chain, in line with the provisions of the Group Supplier Code of Conduct.

4.1 AGE VERIFICATION AT RECRUITMENT STAGE

During the recruitment stage of a new candidate, the personnel of the Human Resources function bear the responsibility of specifying the minimum age for work, in accordance with current legislation, as a requirement for any future hires. The responsibility lies with the Director of the Human Resources & Organization Function even if the selection procedure is entrusted to other individuals and/or third parties: he/she will communicate to the aforementioned individuals/entities the checks to be carried out.

After the selection process, during the recruitment phase, the personnel of the Human Resources & Organization function determines the veracity of the personal data of the candidate by requesting a copy of his or her identity documents, of the residence permit (in the case of non- EU citizens) and of the additional documentation required by the applicable Collective Agreement. In no case will it be possible to retain identity documents in original format.

4.2 REMEDIAL ACTIONS

In the event that the presence of a Salvatore Ferragamo S.p.A employee below the minimum age required, or if any case attributable to child labour is identified on the work premises, the Company will take appropriate corrective actions in the shortest time possible, also including the involvement of the Social Services of the Municipality where the case was found and the competent authorities.

If the involvement of the child appears particularly serious, the Company also commits to collaborating with specialized organizations and associations to define a remedy plan and protect the psychophysical integrity of the minor. The aforementioned procedure should guarantee, among other things, for the child to complete his or her compulsory education, according to what provided in the current legislation, also through the payment of school fees, books and transportation to school.

The Company, based on the information provided by the Social Performance Team and by the other individuals and bodies involved in the implementation of the remedy procedure, commits to organizing the process and finding the necessary resources for the effective implementation of the remedy plan.

4.3 MONITORING OF SUPPLY CHAIN

The Company commits to communicate effectively the requirements of the SA8000 Standard in relation to child labour to its raw materials, manufacturing services and finished products suppliers through the circulation of the *Group Supplier Code of Conduct*. During the process of selection and evaluation of the suppliers, the Company requires them to comply with the provisions of the *Supplier Code of Conduct* and the legal and regulatory frameworks applicable in the context in which they operate, as well as the commitments undertaken with the Group.

The Company commits to applying due diligence in verifying that its suppliers/ subcontractors, private employment agencies and sub-suppliers comply with the SA8000 Standard requirements in relation to the use of child labour and young workers, assessing the significant risks also by monitoring their social performance and providing reasonable efforts to ensure that the suppliers themselves adequately address these risks.

If cases of child labour, which do not meet the requirements of the SA8000 Standard, are identified, the Company will promptly report to the competent bodies, and also collaborate in the implementation of an adequate remedy plan. The case of non-compliance will also be properly registered within the Company.

4.4 ACTIVE PARTICIPATION INITIATIVE AND TRAINING

In line with current legislation, the Company commits to carefully monitor compliance with the rights of children and adolescents in the context of active participation and training initiatives that may involve children under the age of 18, such as internships, alternation between school and work programs and ad hoc initiatives for the promotion of the Ferragamo culture with new generations. In these contexts, the Company undertakes to prevent, with every mean available, the exposure of minors to potentially hazardous or harmful situations for their well-being as well as for their physical and mental development.

5. RESPONSIBILITY AND MANAGEMENT OF VIOLATION REPORTS

The responsibilities inherent to the present procedure are under the responsibility of the Human Resources Director, with the assistance of the Company functions that he or she will deem appropriate to involve from time to time.

Internal personnel, including employees, procurators, members of corporate bodies, and collaborators who work in the name of and on behalf of Salvatore Ferragamo, are required to report any cases, even if uncertain, of child labour in the context of Company activities through the dedicated whistleblowing system.

For any report concerning an alleged and/or verified violation of this Policy, it is also possible to contact the Group Ethics Committee at the following e-mail address: **ethics-committee@ferragamo.com**.

The Group commits to treating every report received with confidentiality, guaranteeing privacy and without any form of retaliation, without prejudice to legal obligations.

The Ethics Committee will proceed to verify the existence of the elements through the development of an investigation. If there is actual evidence for what reported or obvious evidence of violations of the present Policy are found, the Ethics Committee will communicate the conclusions reached to the Social Performance Team. The latter will open a case of non-compliance to the SA8000 Standard (recording the related data). In the meantime, the procedure for the implementation of remedial activities, previously described in paragraph 4.2, will be initiated.

6. APPROVAL AND DISSEMINATION

The Board of Directors of Salvatore Ferragamo S.p.A. approves this Policy and promotes its divulgation to all recipients.

Osmannoro, 24/4/2019

Signature: 

