

## **MODERN SLAVERY STATEMENT**

Approved by the Board of Directors of Salvatore Ferragamo S.p.A. on July 12, 2022

*Salvatore Ferragamo*

This document was approved by the Board of Directors of Salvatore Ferragamo S.p.A. (hereinafter, the “Company”) on July 12, 2022 and describes the measures taken by the Salvatore Ferragamo Group (hereinafter “the Group” or “Salvatore Ferragamo”) to ensure, as required by the UK “Modern Slavery Act 2015 - Section 54”, by the California “Transparency in Supply Chains Act of 2010 - SB 657” and by the Australian Modern Slavery Act (No. 153) 2018, the absence of any form of “modern slavery, forced labor and human trafficking” within its organization and outside along its own supply chain.

This statement refers to the fiscal year ended December 31, 2021 and is applicable to all legal entities belonging to the Group, having been drawn up in consultation with each legal entity that Salvatore Ferragamo S.p.A. is able to control directly or indirectly.

**INTRODUCTION**

Artisanal creativity, innovation and excellence have always been the core values of the Company, and are applied when conceiving and producing each creation, designed to make the Ferragamo product buying experience exciting and engaging for the customer. A strong bond with the local community, Italian tradition, and the legacy left by Founder Salvatore Ferragamo are still the pillars of the business, and the Group is strongly committed to protecting the areas where it operates and the people working for it.

**THE SALVATORE FERRAGAMO GROUP**

Salvatore Ferragamo S.p.A. is the parent Company of the Salvatore Ferragamo Group, one of the world's leaders in the luxury industry and whose origins date back to 1927. The Group is active in the creation, production and sale of shoes, leather goods, apparel, silk products and other accessories for men and women. The Group's product offer also includes fragrances, eyewear and watches, manufactured by licensees in Italy and abroad, with the aim of taking advantage of local traditions and quality. The uniqueness and exclusivity of our creations, along with the perfect blend of style, creativity and innovation enriched by the quality and superior craftsmanship of the 'Made in Italy' tradition, have always been the hallmarks of the Group's products.

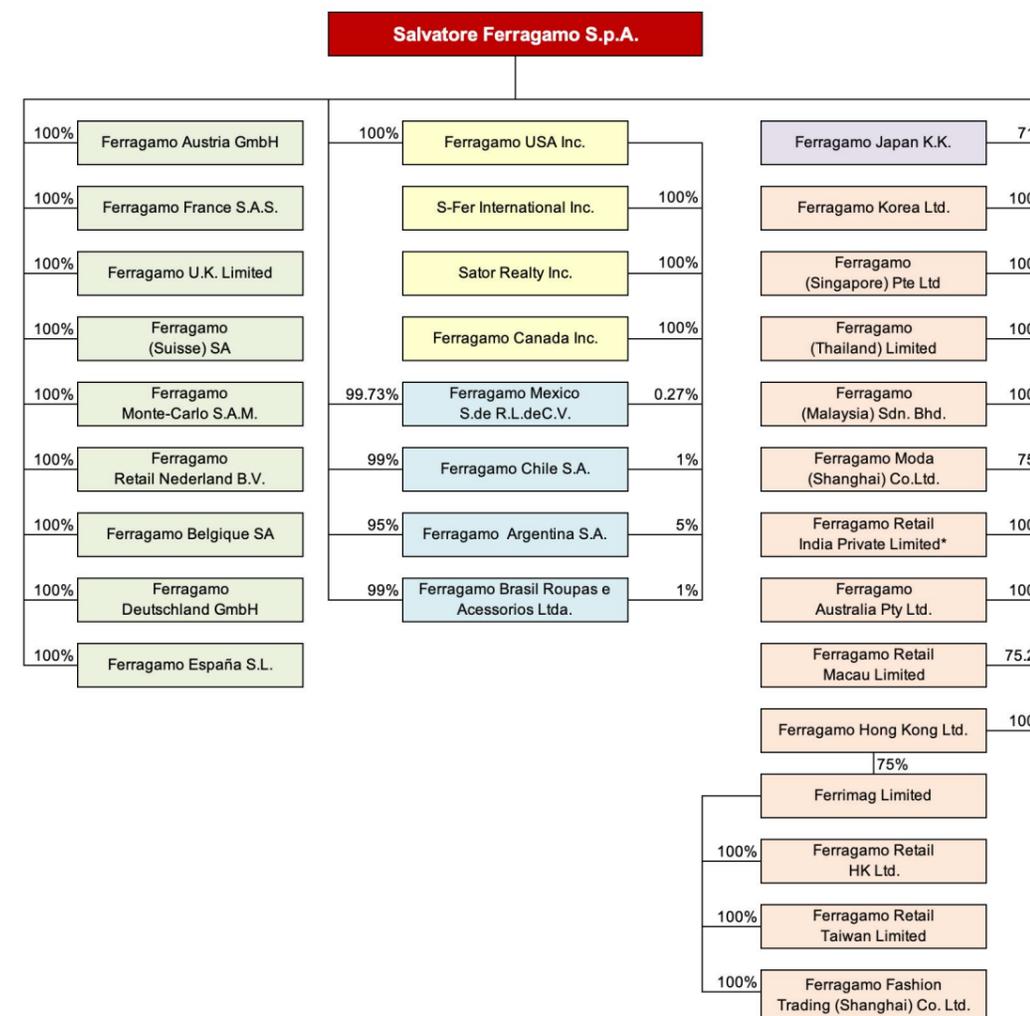
The Salvatore Ferragamo Group includes Salvatore Ferragamo S.p.A. as the Parent company and its subsidiaries, grouped into five geographic areas: Europe, North America, Central and South America, Asia Pacific and Japan.

Considering the whole distribution structure, the Salvatore Ferragamo Group is present in about 90 countries across the world. At 31 December 2021 the Group's distribution network could rely on 409 directly operated stores (DOS) and a network of tailored single brand stores and/or stores-in-stores managed by third parties (TPOS) as well as through a multibrand channel (taken as a whole, the so-called wholesale channel).

As at 31 December 2021, the Group had over 3,900 employees, of which 94% on permanent contracts. The Group does not particularly rely on seasonal workers.

Since 2011, Salvatore Ferragamo S.p.A. has been listed on the Italian Stock Exchange.

**GROUP STRUCTURE**



- Notes**
- European companies
  - North America companies
  - Centre and South America companies
  - Asia Pacific companies
  - Japanese companies
  - \* Non operating company

## THE SUPPLY CHAIN

Made in Italy, style, and elegance: these are the qualities that have always characterized the Salvatore Ferragamo Group's products. Staying true to these values, the Group has always been committed to supporting the development of local communities, promoting Italy's world-class manufacturers and carefully purchasing products and services almost exclusively from Italian suppliers.

The philosophy of the Founder, who remained deeply connected to his roots, lives on in the strategy of the Group, which relies on a wide network of carefully selected and qualified workshops known for their outstanding craftsmanship. Many of them have been working with Salvatore Ferragamo for years now.

To deliver both a quality product and make production and distribution more efficient and flexible, the Salvatore Ferragamo Group pays special attention to the key stages of the supply chain, limiting subcontracting to just one tier, thus facilitating an improved monitoring of quality throughout the supply chain. Similarly, the Group directly manages the product development and industrialization stages, and performs quality and safety controls, both at the start and at the end of the manufacturing process, on the whole production.

When selecting suitable suppliers, the Group places special emphasis on the technical assessment of raw materials, semi-finished and finished products as well as the acquisition of documents concerning manufacturing plants – and, in some cases, it follows up with a visit to the premises.

The Group relies on a procurement structure with a high level of technical preparation and works with reputable and well-known companies, with which it has established an ongoing collaboration. This structure highlights the Group's strong connection to the local community and, considering the geographic distribution, it has a high percentage of Italian raw material suppliers, equal to around 97% of procurement in 2021. Moreover, Tuscan contract manufacturers accounted for approximately 54% of the turnover of finished product processing, while Campanian contract manufacturers accounted for approximately 24%; the remaining part of this 2021 turnover is allocated to the other Italian regions.

As for workshops, the Salvatore Ferragamo Group works exclusively with highly specialized manufacturers that meet the most demanding quality standards. The majority of these are located in Italy. Selection and retention of external workshops is vital to the brand, as it helps maintain the world-class quality standards of its products as well as protecting Salvatore Ferragamo's extensive know how developed over the years. The retention of external workshops has been traditionally guaranteed by ongoing partnerships, the frequent exchange of information and skills between the Group and the contract manufacturers, and the highly specialized products and production processes involved.

## POLICIES

Corporate ethics are a top priority for Salvatore Ferragamo in its business dynamics and demands. They convey a message of loyalty, fairness and respect throughout the entire Group, and constitute a reference point in its business environment. The Parent Company cultivates and fosters continuous, direct line of communication with its subsidiaries, which creates a shared culture of ethical business principles on which the businesses are based upon.

In a framework which seeks to integrate social responsibility in daily business operations, the Group considers the collaboration with the supply chain as central in an effort to achieve the highest ethical and sustainable business development standards.

The Group is committed to guaranteeing human rights for all workers, both within the Group and in its supply chain, and it has implemented several policies and procedures to ensure their respect and implementation.

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- The **Code of Ethics** sets forth the ethical principles and general guidelines that, along with legal, regulatory and contractual rules, characterize the organization and activities of Salvatore Ferragamo S.p.A and its subsidiaries. The Code of Ethics applies to the Company's corporate boards, employees, legal representatives and independent contractors who, for any reason and regardless of the type of contractual relationship, operate in the name and on behalf of Group Companies. In the cases contemplated by its corporate policy, the Company requires compliance with the Code of Ethics by certain third parties (business partners, customers, suppliers, professional, consultants and other types of external parties) with which it enters into business dealings or transactions. Disciplinary measures, varying according to the severity and within the limits of the current regulatory framework, are applicable by the Company in the event of any breaches. In particular, failure to comply by external parties may result in the termination of the contract, engagement or general relationship in effect with the Company, as well as claims for damages if the conditions are present. The full Code of Ethics is available in the Governance section of the Group's web site.

- The **Sustainability Policy**, prepared in accordance with the principles and rules presented in the Group Code of Ethics and in the Framework of Sustainable Development Goals (SDGs) provided by the United Nations, establishes a framework of Guiding Principles on the social and environmental responsibility of the Salvatore Ferragamo to be adopted in its daily operations. It aims to establish an equity and professional-oriented corporate culture by promoting honesty, integrity and transparency, and by incentivizing sustainable development through starting a dialogue on corporate ethics and increasing the responsibility of our stakeholders. The Policy Recipients are the corporate boards, employees and any person operating in the name and on behalf of any company of the Salvatore Ferragamo Group. The full Sustainability Policy is available in the Group's sustainability-site.

- Salvatore Ferragamo S.p.A. is signatory to the **United Nations Global Compact**, the world's largest corporate sustainability initiative, offering a universal language for corporate responsibility and supporting organizations in making responsible strategic decisions to promote internationally shared corporate goals.

Participation in the Global Compact includes a commitment to comply with the provision of the International Labor Organization (ILO), concerning abolition of forced and child labour.

Information about the participation of the Group is available in the U.N. Global Compact's site.

- The **Supplier Code of Conduct** sets forth the ethical principles and rules of conduct that must characterize the commercial relations between the Group and its partners. The Code includes rules and standards of conduct concerning business ethics and integrity, labor and human rights, the respect of ecosystems, including respect of animals and environment protection, and product responsibility. Direct Suppliers of the Salvatore Ferragamo Group are required to guarantee their compliance with the Code, disseminating it and requiring its respect by their employees, suppliers, external collaborators and others belonging to the supply chain for the Group. In the event of cases of non-compliance with the Code, the recipients are required to implement the actions necessary for the adjustment of their activities and operations.

The Supplier Code of Conduct is available in the Governance section of the Group's web site.

- **The Inclusion Policy** aims to support multiculturalism, considered essential for the development of innovative and distinctive elements that can increase the Brand's competitiveness, and to promote equality and equal opportunities, fighting all types of discrimination and condemning any form of harassment. In addition, the Policy sets the goal of promoting meritocracy and fair treatment at all levels, facilitating the development, expression and enhancement of individual potential.

The Inclusion Policy is available in the Governance section of the Group's web site.

- Salvatore Ferragamo S.p.A. has obtained the internationally recognized **certification SA8000** for social accountability. SA8000 is a global standard that accounts for business ethics and responsible labour relations, with specific requirements on refusing the use of child labour and the use of forced and compulsory labour. A committee, called the Social Performance Team, was set up; it is composed of a balanced number of representatives of workers and management and it oversees the implementation and correct application of the SA8000 Standard.

The SA800 Policy is available in the Governance section of the Group's web site.

- Salvatore Ferragamo S.p.A. has adopted the **Policy for combating child labor**, which aims to formalize the Company's commitment in this area and prevent minors from being exposed to situations that may be risky or harmful for their development and physical and mental health.

The Policy for combating child labor is available in the Governance section of the Group's web site

- Salvatore Ferragamo has adopted an **Organizational, Management and Control Model** under Italian Law-Decree 231/2001 in order to prevent the corporate liability for criminal offences perpetrated by own executives, employee or representatives. Special Section of the Company's Organizational Model requires Ferragamo managers to obtain from industrial suppliers and manufacturers certifications that they and their sub-contractors comply with national labor laws, including those laws relating to minimum age, compensation, work conditions, and collective work agreements.

The general section of the Organizational Model is available in the Governance section of the Group's web site.

## RISK ASSESSMENT & DUE DILIGENCE

The Salvatore Ferragamo Group is committed to identifying the main business risks and implementing adequate instruments to manage them, through a model consistent with the recognized standards of **Enterprise Risk Management (ERM)**. As regards social aspects and respect of human rights, the Group monitors risks connected to the violation of labour laws, as well as inadequate procurement and supply chain model.

The Group believes that the risk of modern slavery within its organization is almost non-existent and that it is generally low in its production supply chain. The geographical location and the nature of the carefully selected and qualified suppliers, often dedicated and continuous collaborators of the Group for many years, reduces the risks of forced labor and trafficking in human beings.

In order to ensure the achievement of ethical and sustainable standards along its supply chain, the Salvatore Ferragamo Group promotes monitoring and awareness-raising initiatives along its supply chain constantly monitoring the adequacy of the procurement model. In particular, risk elements in the supply chain are assessed – in terms of impact and likelihood of occurrence – with respect to human rights, child labor, forced and compulsory labor, non-discrimination, freedom of association and collective bargaining, occupational health and safety, working time, remuneration and regularity of working conditions and applied disciplinary practices.

In order to mitigate the likelihood and impact of the occurrence of risks of human rights violations in its production chain, the Group carries out several controls related to their respect and, more generally, to the promotion of integrity and ethics in business. In particular, in addition to a specific **qualification procedure for suppliers** in the production sector, starting in 2019, the Group disseminated and required the signing of a specific Code of Conduct. Drawn up with a view to integrating social responsibility and collaborating with its own supply chain, the Supplier Code of Conduct sets out ethical principles and rules of conduct, which supplement the legal, regulatory and procedural standards that underpin commercial relations with the supply chain. The rules and standards of conduct concern business ethics and integrity, labor and human rights, respect for ecosystems and product responsibility. The recipients are responsible for guaranteeing their own compliance with the Code, as well as for disseminating it and asking their employees, suppliers and external collaborators to comply with it.

In order to monitor actual compliance with the principles set out in the Suppliers' Code of Conduct, the Group launched an audit plan on its direct contract manufacturers and suppliers. This audit work accompanies the monitoring of sub-suppliers which the Group has been performing since 2014, in order to assess compliance with ethical and social standards. The **monitoring activity** is coordinated by the Group Compliance function and carried out by a specialized external company according to a multi-year plan and includes both the request for a self-assessment, by filling in a questionnaire, and on-site audits, with interviews with workers and management and an inspection of suppliers' production sites. Based on the results of the audit, in case of non-compliance with the provisions of the Code, the addressees are obliged to implement the actions required to adjust their activities and operations in order to remove, prevent or mitigate any identified non-compliance. The plan envisaged specific actions to be implemented within agreed deadlines or suggestions for improvement activities.

In the event of serious or repeated violations of the Code, the Group reserves the right to terminate business relations with suppliers, as well as in the event of failure to implement the agreed improvement plan for the removal of any major non-conformities or failure to cooperate in the implementation of monitoring activities.

During 2021, 35 self-assessments and 74 audits were carried out, involving direct suppliers, as well as subcontractors. With reference to the non-conformities identified, 32 follow-ups were also conducted to verify the corrective measures implemented, of which 25 were carried out remotely and 7 through new visits to the suppliers' sites.

Among these, the most significant critical issues that emerged in 2021 concerned a limited number of suppliers and for the most part related to compliance with occupational health and safety standards. Minor findings and recommendations also mainly concerned health and safety issues and, for the remainder, environmental issues. With regard to respect for human and workers' rights, non-conformities emerged in a limited number of cases, exclusively related to subcontractors, irregularities that were promptly reported to the Company's direct suppliers to ensure that immediate corrective actions would be adopted.

Finally, the Group relies on a **whistleblowing** system to correctly manage reports of violations of laws, including human rights, and the values and principles of the Code of Ethics, as well as any other internal policies or procedures. The Group encourages its suppliers to communicate and has set up specific channels for sending reports of alleged or ascertained violations of its Code of Conduct. There were no reports received in 2021 with reference to issues related to human rights or violations of the Supplier Code of Conduct.

#### **COVID-19 PANDEMIC IMPACTS**

For Salvatore Ferragamo Group protecting and safeguarding human resources has been particularly critical in the emergency situation caused by the global spread of the Covid-19. Indeed, the pandemic has laid the foundations for a review of the risk portfolio in order to understand how the Group has responded and is responding to the pandemic. To this end, the Risk Management function has undertaken a specific Covid Risk Assessment activity with the aim of identifying and assessing the main risks and business areas affected by the Covid-19 emergency and monitoring their treatment or containment actions implemented and considered most effective. The Company's Risk Map was supplemented with the results of the Covid Risk Assessment.

In order to mitigate social risks caused by the Covid-19 pandemic, the Group took steps to review the working methods of the more than 3,800 people with whom it collaborates and to ensure the highest standards in terms of health and safety. In this regard, specific safety protocols with stringent measures have been defined and supplementary health insurance related to Covid-19 symptoms has been activated for Italian staff. Where allowed by regulations, the Group offered voluntary and free serological testing. The corporate population had access to remote working. With regards to the stores, instead, global guidelines have been defined in the following areas: staff safety tools, client service, store cleaning & maintenance and HR emergency.

With a view to protecting and safeguarding the human resources of the supply chain, Salvatore Ferragamo has joined the International Labor Organization, International Organization of Employers and the International Trade Union Conference, IndustriALL Global Union, employers' organisations and other brands to call for action in order to support the rights of garment workers and manufacturers throughout the disruption caused by the

COVID-19 pandemic. The Brand is committed to protect garment workers' income, health, and employment, while calling for jointly working on sustainable systems of social protection for a fairer and more resilient garment industry. Moreover, monitoring activities of the production chain were intensified, in order to promptly identify signs of difficulty and manage any critical situations arising from the Covid-19 emergency.

In response to the continuing Covid-19 pandemic, the measures protecting the health of employees at both offices and directly operated stores remained in place throughout 2021; specifically, the safety protocols defined in 2020 remained in place, updated as necessary, and the Group maintained a supplemental health insurance policy for Italian employees covering symptoms associated with Covid-19. In October 2021, as required by law, the Group started systematically checking for Green pass certificates in the workplace at its offices and stores in Italy.

Smart-working, introduced as an experiment in 2019 and expanded also to protect the health of employees at both the Italian offices as well as the offices of the Group's foreign entities, remained in use, making it flexible in accordance with the evolution of the pandemic

#### **PERFORMANCE INDICATORS (KPI)**

The Salvatore Ferragamo Group constantly monitors the effectiveness of actions and measures in place for an ethical and responsible business conduct, including measures taken to mitigate modern slavery risks. In particular, the Group has defined internal KPIs to monitor how the business is exposed to the risk of modern slavery (whistleblowing reports) and to measure the performance of anti-slavery actions undertaken (results of audits conducted on suppliers and number of training activity performed).

#### **TRAINING**

The Salvatore Ferragamo Group is committed to both raising awareness and maintaining open and clear communication and training within the organization, with respect to ethical principles and policies for the respect of Human Rights and Labour Standards and the prevention of modern slavery.

In 2019, an e-learning program on the Group's Whistleblowing System and the Code of Ethics was launched. It is available, in nine languages, to all employees through a dedicated intranet platform and offered to all new employees, as part of their onboarding training.

Specific trainings on human rights and social responsibility have been developed in the SA8000 context, involving senior management and employees, also engaging personnel with direct responsibility for supply chain management.

Furthermore, initiatives have been taken for the Supplier Code of Conduct's implementation, providing information and training to recipients, as well as support to achieve full compliance with the principles and provisions contained therein, including prevention of modern slavery along the entire supply chain. In particular, training workshops were held for the main suppliers of finished products and third-party workers (who together cover more than 70% of Ferragamo products). Finally, a questionnaire was provided to key suppliers of raw materials, manufacturing services and finished products of the Group, in order to obtain a self-assessment and

to identify any areas of non-compliance, which require the implementation of the suggestions included and any other activity deemed as appropriate, so as to facilitate the gradual alignment of their activities and operations with the principles and rules of conduct defined within the Code.

#### **LOOKING AHEAD**

For the Salvatore Ferragamo Group, ethics are not only central to the setting of the Company's goals, but they also a critical tool for planning the Group's future activities, in our commitment to pursue value creation for the years to come and for the new generations.

It is for us essential that the integrity of the business and the respect of human rights remain priorities in the definition of objectives along the entire supply chain and that the Group remains committed to working proactively to encourage the fight against modern slavery by reviewing its activities, operations and procurement procedures.

**Marco Gobbetti**  
Chief Executive Officer and Managing Director  
Salvatore Ferragamo S.p.A.

A handwritten signature in black ink, appearing to read 'Marco Gobbetti', written in a cursive style.

