

FERRAGAMO

RESPONSIBLE POLICY LOBBYING

Approved by the Board of Directors of Salvatore Ferragamo S.p.A.
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1. INTRODUCTION

1.1 Salvatore Ferragamo Group

Salvatore Ferragamo S.p.A. is the parent company of the Salvatore Ferragamo Group (hereinafter referred to as the “Group” or “Ferragamo”), a major player in the luxury industry whose origins date back to 1927. Salvatore Ferragamo is renowned for the creation, production, and worldwide distribution of luxury collections of shoes, leather goods, clothing, silk products, and other accessories for men and women, including eyewear, watches, and perfumes made under license. Ferragamo continues to reinterpret and evolve its Founder's spirit and heritage with creativity, innovation and a sustainable approach.

1.2 The Values and Principles of the Group

Ferragamo, in the context of entrepreneurial and economic dynamics and requirements, has among its primary values that of business ethics, through which it transmits a message of loyalty, fairness and respect that applies to the entire Group and represents a point of reference in the social reality in which it operates.

The Code of Ethics adopted by the Group and approved by the Board of Directors of Salvatore Ferragamo S.p.A. encapsulates all the values, the fundamental principles in which Ferragamo believes as well as the general rules, which, similarly to legal, regulatory and contractual rules, characterize the organization and activities of the Group.

With the aim of steering the business in the direction of integrity, transparency and fairness, the Group has equipped itself with guidelines, policies and procedures that encompass all the principles and values by which Ferragamo is inspired.

2. PURPOSE

Lobbying is the instrument of political representation by which groups, organizations and individuals, linked by common interests, legitimately affect institutions to influence their decisions for their own benefit.

The Group believes that the composition and enhancement of legitimate special interests, represented in a transparent manner, is a constitutive and essential element of the democratic method. Indeed, the development of effective, coherent and meaningful public policies requires continuous and constant discussion with relevant counterparts to enable regulators to benefit from the *know-how* of different stakeholders.

This process should aim to help identify and evaluate different options and contribute to a *decision-making* process based on clear and justified assessments.

The purpose of this Policy is to provide the principles and guidelines of responsible, clear and transparent lobbying aimed at representing the Group's instances, positions and legitimate interests to institutions.

3. TARGET AND AUDIENCE AND SCOPE

This Policy applies to all employees and collaborators who, in any capacity and regardless of the type of contractual relationship, work in the name and on behalf of Group Companies.

The Ferragamo Group carries out these activities through the trade and industry associations to which it belongs in the countries in which it is present (hereinafter “the Associations”).

The organization follows legislative and regulatory developments both nationally and internationally, also taking part in public consultations and working tables in a transparent and tracked manner.

The duly trained corporate functions assigned to such activities are the *General Counsel Department*, the *Transformation & Sustainability Department*, and the *Marketing & Communication Department*, which may involve other dedicated corporate functions, according to the rules under discussion.

4. GUIDING PRINCIPLES FOR EMPLOYEES AND EXTERNAL PARTIES

Ferragamo employees who take part in such initiatives and meetings are committed to being active and influential in any debate that may be relevant to company strategies, always respecting the interests and needs of people, communities, the environment, International Conventions and Company policies.

Ferragamo shares its vision, respecting the views of regulators and other stakeholders involved, always striving to guide the discussion according to the principles of transparency and integrity, with due consideration of the *OECD Due Diligence Guidance for Responsible Business Conduct*.

Particular attention is paid to ensuring that the Ferragamo Group is not a member of Associations that may have positions that are controversial with respect to the public interest or whose positions do not correspond to the principles and values followed by the Group.

Company procedures prohibit the disbursement of contributions to political parties. The policy adopted on donations and sponsorships stipulates that such acts in favor of companies or associations, including unrecognized ones, must be duly authorized and traced, with certain identification of the counterparties involved and the underlying reasons for the disbursement. The transfer of economic value is always carried out through authorized intermediaries, so that traceability is guaranteed based on appropriate documentation.

In any case, it is understood that the Group, in its relations with representatives of the Public Administration, both Italian and foreign, prohibits all employees from engaging in conduct that conflicts with current laws and regulations as well as with the Code of Ethics, the Organizational Model adopted pursuant to Italian Legislative Decree 231/2001, the Anti-Corruption Policy and any other internal policy adopted. For more information please refer to the [Ferragamo Group corporate website](#).

As stated in the Anti-Corruption Policy, the Group's relations with parties representing the Public Administration, Public Officials or persons in charge of a public service are based on principles of fairness, loyalty and the utmost transparency, as well as compliance with applicable laws and regulations.

In the context of relations with the Public Administration, Public Officials or persons in charge of a public service, it is not permissible to seek or establish relationships of favor, influence, interference with the aim of directly or indirectly conditioning their activities.

Therefore, the Group prohibits the gift of products of the Ferragamo Brand, as well as the gift of other products or services or even the promise of benefits in favor of individuals related to the Public Administration when aimed at obtaining favorable treatment, as established in the Policy Gifts of Representation and Charity, published on the company intranet and accessible to all employees.

5. ADVOCACY

In its social responsibility activities, Ferragamo also engages in advocacy activities on issues of collective interest. These activities aim to promote policies and initiatives that reflect the Group's corporate values, with a focus on sustainability, social inclusion, diversity and environmental protection. Ferragamo engages, both directly and by participating in working groups and multilateral organizations, in raising awareness about climate change and other environmental challenges, such as reducing pollution, protecting biodiversity, and sustainably managing natural resources.

Ferragamo works with organizations and institutions to positively influence public opinion and decision makers, contributing to social and ecological progress through transparent and responsible dialogue.

6. DISCIPLINARY MEASURES

Compliance with this Policy is an integral part of the contractual obligations of employees, contractors and all recipients in general. In the event of violations, Salvatore Ferragamo imposes disciplinary measures, varying according to severity and within the limits of the current legal framework.

7. CONTROLS

In line with international best practices and in full compliance with applicable regulations, Ferragamo has implemented a system of reporting aimed at preventing and countering unlawful conduct or conduct contrary to principles and rules prescribed in its organizational models, Code of Ethics and corporate policies, maintaining the confidentiality of reporters and all other protected parties, safeguarding them from the risks of possible retaliation, in full compliance with all applicable legal provisions.

The procedure can be accessed at the following link:

<https://group.ferragamo.com/en/governance/model+231+and+code+of+ethics>

