

BVLGARI

BUSINESS PARTNER & SUPPLIER CODE OF CONDUCT

Introduction

Bulgari Business Partner & Supplier Code of Conduct is a set of core practices in the areas of business integrity, labour policies, environmental management and responsible sourcing that Bulgari is committed to adopt in its own operations and that it expects are adopted by all its business partners and suppliers.

Bulgari believes that the continuously advancing in its ethical, social and environmental performance is a fundamental component of the excellence of the products delivered to clients.

Bulgari is certified member of the Responsible Jewellery Council. This certification intends to provide clients with the trust that our value chain, from mining to retail, is managed responsibly.

In order to foster its commitment, Bulgari goes beyond the Responsible Jewellery Council requirements, assuring the responsible sourcing of all its Business Units, for all the materials used in its products.

In the conduct of its activities, Bulgari is committed to complying with all applicable laws, regulations and national and international conventions, as well as with best practices, in particular with regards to ethics, human rights, social responsibility and protection of the environment.

Bulgari is committed to implementing the five-step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the provisions of the Supplement on Gold. In addition, Bulgari is committed to implementing the UN Guiding Principles on Business and Human Rights.

Bulgari expects its business partners & suppliers to apply the same respect for applicable laws and ethics principles as they do in the management of their own companies. Bulgari requires strict compliance with these standards by all its business partners & suppliers, their workers, their production facilities, their offices, their shops, their subcontractors and their own suppliers.

When national legislation or other applicable regulations address the same issue as this Business Partner & Supplier Code of Conduct, the highest standards or most restrictive provisions shall apply. When this Business Partner & Supplier Code of Conduct is in contradiction with applicable law, the applicable law shall apply.

Bulgari works with business partners & suppliers who agree to comply with the requirements of this Business Partner & Supplier Code of Conduct and with the principles stipulated in the Conventions of the International Labour Organization, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, The International Covenant on Economic, Social and Cultural Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Women's Empowerment Principles.

Furthermore, Bulgari is one of the Maisons of the LVMH Group.

The LVMH Group attaches great importance to ensuring that its Maisons and their partners share a set of common rules, practices and principles with respect to ethics, human rights, social responsibility and protection of the environment.

Consequently, the LVMH Group expects its Maisons to establish and promote exemplary relations with all their partners (suppliers, distributors, subcontractors, etc.) anchored in responsibility, fairness and integrity.

Each LVMH Group Maison therefore requires its suppliers to respect the ethical principles presented in this Business Partners & Suppliers Code of Conduct and to ensure that their own suppliers and subcontractors do the same.

BVLGARI

Our business partners & suppliers remain guarantors towards Bulgari for work performed by their subcontractors and suppliers and guarantee respect by their subcontractors and suppliers of this Business Partner & Supplier Code of Conduct and relevant obligations. In the event of any violation of this Business Partner & Supplier Code of Conduct by the business partner or supplier, or one of its suppliers or subcontractors, Bulgari reserves the right to review the business relationship and possibly terminate it in conformity with applicable law, even if there is no written contract formalizing this relationship, without prejudice to the other rights of Bulgari or remedies it might seek.

HUMAN RIGHTS

Bulgari requires its business partners & suppliers to make their best effort to respect human rights in their conduct:

Prohibition of child labor: Work by children under the age of 16 is strictly prohibited, including, in particular, the Worst Forms of Child Labour as defined by ILO Convention No.182. In countries where local laws set a higher age for child labor or set at an age for completion of compulsory education higher than 16, the highest age is applicable. Any work that is likely to jeopardize children's physical, mental or moral health, safety or morals should not be undertaken by anyone under the age of 18.

Prohibition of forced/compulsory labor: Any use of forced or compulsory labor as defined by ILO Convention No.29; slavery; servitude; or human trafficking by our suppliers or recruitment agencies that they engage; as well as coercion to perform work; wage withholding; compulsory overtime; withholding identity papers or work permits or requiring workers to deposit a bond or the use of any other constraint, is strictly prohibited. All workers are entitled to accept or leave their employment freely. Business partners & suppliers may not require workers to work to repay a debt owed to them or to a third party.

Prohibition of harassment and abuse: We expect our suppliers to treat their workers, contractors and the local communities in which they operate with respect and dignity. Our business partners & suppliers may not tolerate or engage in any form of corporal punishment, physical, sexual, verbal or psychological harassment, torture, cruel, inhuman and degrading treatment, or any other kind of abuse.

Prohibition of discrimination: We expect our business partners & suppliers to treat all workers equally and fairly. Our suppliers may not engage in any kind of discrimination – in particular with regards to wages, hiring, access to training, promotion, maternity protection and dismissal – based on sex, race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, union membership, nationality, gender identity, migrant status or social background.

Freedom of association: We require our business partners & suppliers to respect and recognize the right of workers to negotiate collectively, and to create or join labor organizations of their choice without any sanction, discrimination or harassment.

Conflict-affected areas: We require our business partners & suppliers to commit to avoid contributing to conflicts and put in place all the measures necessary to assure the traceability of minerals and raw materials.

Use of Security forces: We require our business partners & suppliers to limit the role of security personnel to providing security to workers, facilities, equipment and property. In exercising their duties, security personnel shall follow the rule of law and guarantee protection of human rights.

LABOR STANDARDS AND SOCIAL RESPONSIBILITIES

Bulgari requires its business partners & suppliers to exhibit exemplary social responsibility in their conduct.

BVLGARI

Prohibition of illegal, clandestine and undeclared employment: Our business partners & suppliers are required to comply with all applicable regulations to prevent illegal, clandestine and undeclared employment.

Wages and benefits: Our business partners & suppliers must at minimum pay wages on a regular basis and no less than monthly, compensate workers for overtime hours at the legal rate and meet all legal requirements relating to worker benefits. If there is no legal minimum wage or rate for overtime pay in the country concerned, the supplier must ensure that the wages are at least equal to the average minimum in the relevant industrial sector and that overtime pay is at least the same as the usual hourly compensation. Wage deductions shall not be used as a disciplinary measure. We require our suppliers to guarantee that all workers receive benefits stipulated in any applicable collective bargaining agreements, company agreements and other applicable negotiated individual or collective agreements.

Working hours: Our business partners & suppliers must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards such as the International Labour Organization. Our business partners & suppliers may not impose excessive overtime hours. The total number of hours worked per week including overtime may not exceed legal limits. Workers are entitled to the minimum number of days off established by applicable laws and at minimum must have at least one day off in every seven-day period.

Ensuring health and safety: Our business partners & suppliers are expected to provide their workers with a safe and healthy workplace environment in order to avoid accidents or bodily injuries that may be caused by, related to, or result from their work, including during the operation of equipment or during work-related travel. Business partners & suppliers are expected to set up procedures and trainings to detect, avoid and mitigate as much as possible any hazards that constitute a risk to the health, hygiene and safety of staff. They are required to comply with all applicable local and international regulations and laws in this regard. These same principles are applicable to housing provided by suppliers and business partners.

ENVIRONMENTAL REGULATIONS AND PROTECTION

Bulgari takes concrete measures to protect the environment within the scope of a specific program which includes cooperation with its business partners & suppliers to ensure application of best practices throughout the supply chain.

Bulgari expects its suppliers to share this commitment. It encourages initiatives by its business partners & suppliers to reduce the environmental impact of their activities, notably through the use of green technologies.

Bulgari requires that its business partners & suppliers respect local and international environmental regulations and standards, that they obtain all requisite environmental permits and that they be able to prove effective implementation of the following:

- application of an environmental management system;
- improvements in the environmental performance of their sites and production resources, in particular through proper waste management, elimination of air, water and soil pollution, reduction of greenhouse gas emissions with an emphasis on use of renewable energies, reduction of water and energy consumption and safe management of hazardous chemicals;
- measures to preserve biodiversity and guarantee regulatory traceability and compliance for raw materials and substances used;
- best practices across their supply chain to respect animal welfare;

BVLGARI

- contributions to continuous improvements in environmental performance throughout the lifecycle of the products of Bulgari;
- ensure that staff whose work has direct environmental impact are trained, skilled and have the resources required to effectively perform their work.

BUSINESS INTEGRITY REQUIREMENTS

Bulgari requires exemplary integrity from its business partners & suppliers in the conduct of their business activities.

Legal and fiscal requirements: We expect our business partners & suppliers to act in full compliance with local, national and international laws in the conduct of their business. Bulgari applies a zero-tolerance policy concerning evasion of applicable taxes, fees and royalties due to governments.

Prohibition of all forms of corruption: Bulgari applies a zero-tolerance policy concerning corruption, bribery (including facilitation payments) and trading in influence. We expect our business partners & suppliers to respect all applicable laws concerning corruption and to take appropriate measures to prevent, detect and sanction any corruption or trading in influence, directly or indirectly, across the scope of their activities.

Prevention of conflicts of interest: We require our business partners & suppliers to comply with all applicable laws concerning conflicts of interest and to make every effort to prevent the occurrence of situations that create a conflict of interest within the scope of their business relationship with Bulgari.

Prohibition of money-laundering and finance of terrorism: Money-laundering can occur where an action is taken to mask the true origin of money or assets that are connected to criminal activity. We require our business partners & suppliers to commit to taking all appropriate measures to prevent their operations from being used as vehicles for money laundering.

Respect of competition: Our business partners & suppliers must be committed to compliance with competition law applicable in their host countries. This includes prohibiting abuse of dominant position, concerted practices or unlawful agreements between competitors.

Confidentiality: Our business partners & suppliers must be committed to taking all necessary measures to guarantee the confidentiality of professional secrets and other non-public information they receive in the course of their business relationship with Bulgari.

Prevention of insider trading: We require our business partners & suppliers to comply with all applicable laws and legislation concerning insider trading and to refrain from selling or buying shares in LVMH –Moët Hennessy Louis Vuitton SE, or any linked derivative financial instruments, based on inside information, either directly or indirectly.

Protection of personal information: We require our business partners & suppliers to comply with all applicable laws and regulations on personal data protection.

Customs and security authorities: We require our business partners & suppliers to comply with applicable customs laws, including those relating to imports and the ban on transshipment of merchandise to the importing country.

Trade restrictions and international sanctions: We require our business partners & suppliers to respect international trade laws, restrictions and sanctions, taking into account any changes in these measures, as well as all laws and regulations concerning export controls.

Gifts and invitations: Gifts or invitations may be considered acceptable expressions of courtesy within the context of good business relations if limited in scope and value, given openly and transparently, permitted

BVLGARI

under applicable local law, customary in the location in which they would be given, provided to reflect esteem or gratitude, and not offered with an expectation that something will be offered in return. In some cases, these practices might be subject to anticorruption regulations or other legal requirements, making it essential to be aware of such rules and to fully comply with them.

Protection of assets: Our business partners & suppliers are required to take all necessary measures to protect the resources and assets of Bulgari, in particular its intellectual property rights, and are committed to fighting counterfeiting through a strategy of prevention, cooperation and communication. For example, all finished or semi-finished products bearing distinctive signs belonging to Bulgari and which have not been ordered or have been refused, must be destroyed by the business partners & suppliers as instructed by Bulgari.

Public statements: We expect our business partners & suppliers to be extremely attentive to their public statements, particularly on the Internet and in social media, and to ensure that any statements are not attributed to Bulgari, and are consistent with the business partners & suppliers' commitment to both confidentiality and professional secrecy.

Information transparency: Our business partners & suppliers are required to provide clear and accurate information regarding the methods and resources used, production sites and characteristics of the products or services supplied, and to refrain from making any misleading claims.

ADDITIONAL REQUIREMENTS FOR MINERAL SUPPLY CHAINS

Bulgari requires business partners and suppliers involved in the gold, silver, platinum group metals (PGMs), diamonds and coloured gemstones supply chain to comply with relevant aspects stated therein, in ways appropriate to their size and circumstances:

Responsible Sourcing Policy: We require our business partners and suppliers to establish and implement a responsible sourcing policy that is consistent with Annex II of the OECD Due Diligence Guidance and to formally communicate it to their employees, contractors, business partners, suppliers and stakeholders;

Human Rights: Our business partners and suppliers are expected to follow the UN Guiding Principles on Business and Human Rights;

Supply Chain Due Diligence: We require our business partners and suppliers to put in place all the measures necessary and appropriate to their size and circumstances to facilitate the traceability of minerals and raw materials, and implement due diligence in their supply chains in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance);

Conflict-Affected and High-Risk Areas: We require our business partners and suppliers to identify whether they source materials that originate in or are traded through conflict-affected or high-risk areas and, in such cases to inform and provide Bulgari with the relevant information in a timely manner;

Gold Sourcing: We required our business partners and suppliers in the gold supply chain to implement the OECD Due Diligence Guidance Supplement on Gold in their operations and supply chains.

Diamond Sourcing: We require our business partners and suppliers in the diamond supply chain, including buying and selling diamonds, (rough, polished or set in jewellery), to implement the World Diamond Council (WDC) System of Warranties (SoW) Guidelines.

Kimberley Process: We require our business partners and suppliers involved in the international trade of rough diamonds to comply with the Kimberley Process Certification Scheme (KPCS) requirements and

BVLGARI

recommendations and to comply with all applicable legislation relating to the international trade of diamonds in countries where they operate.

Coloured Gemstone Sourcing: We require our business partners and suppliers in the coloured gemstone supply chain including buying and selling coloured gemstones, (rough, polished or set in jewellery) to implement the due diligence tools of the Coloured Gemstone Working Group or, if members of the RJC, the RJC Code of Practices where that applies to coloured gemstones;

Refiners: We require our business partners and suppliers that are refiners to implement and maintain an internal material control management system to reconcile movement of inventory and to share information annually with Bulgari on the origin of gold (detailing whether mined gold, recycled gold, grandfathered gold).

Use of Security forces/Personnel: We require our business partners and suppliers involved in the mining and manufacturing of diamonds, gold, silver, platinum group metals (PGMs), and coloured gemstones and using security personnel to ensure that security is provided in accordance with the Voluntary Principles on Security and Human Rights and OECD Due Diligence Guidance.

Conflict: We require our business partners and suppliers involved in the mining and manufacturing of diamonds, gold, silver, platinum group metals (PGMs), and coloured gemstones to ensure that they are not directly or indirectly complicit in offering any direct or indirect support to non-state armed groups. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals including, but not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- illegally control mine sites or otherwise control transportation routes, points where diamonds, gold, silver and platinum group metals (PGMs), and coloured gemstones are traded and upstream actors in the supply chain; and/or
- illegally tax or extort money or diamonds, gold, silver and platinum group metals (PGMs), and coloured gemstones at points of access to mine sites, along transportation routes or at points where these minerals are traded; and/or
- illegally tax or extort intermediaries, export companies or international traders.

Monitoring: We require our business partners and suppliers to continually monitor their supply chain;

Certifications: We require our business partners and suppliers to inform and provide relevant information to Bulgari on any certifications, third party assurance assessments or externally verified due diligence reports relevant to the sourcing of minerals from conflict affected and high-risk areas;

Disclosure: We require our business partners and suppliers actively involved in the trade, production or transformation of diamonds, gold, silver, platinum group metals (PGMs), and coloured gemstones to correctly and accurately represent and disclose properties and characteristics of diamonds, gold, silver, platinum group metals (PGMs), and coloured gemstones in accordance with the law and best practices. Business partners and suppliers shall not make untruthful, misleading or deceptive representation, or make any material omission in the selling, advertising or marketing of such materials. In addition, Bulgari applies a zero-tolerance policy concerning fraudulent misrepresentation of the origin of minerals.

BVLGARI

GRIEVANCE

Bulgari is committed to adopting an open and transparent approach in managing stakeholder's expectations. Therefore, any concerns regarding impacts that may arise from Bulgari's direct and indirect behaviours under the Business Partner & Supplier Code of Conduct can be raised either:

- Anonymously – by submitting a description of the incident and supporting evidence;
- Non-anonymously – by submitting name, contact details and description of the incident and supporting evidence.

Reports can be submitted as follows:

- by e-mail: grievances@bulgari.com
- by post to this address: Bulgari SpA - Legal Department – Lungotevere Marzio, 11 - 00186 Rome (Italy)

In handling such reports, Bulgari will act to safeguard the reporting parties against any form of retaliation also guaranteeing the identity of the reporting parties, unless otherwise required under the law. Bulgari will keep record of grievances for at least 5 years. Personal data will be handled in accordance with the principles of current applicable data protection legislation by duly authorised personnel; data will not be disseminated and will be kept by Bulgari with the appropriate safeguard measures.

Relevant internal departments may be involved in the investigation process depending on the nature of the grievance. Bulgari reserves the right not to investigate grievances not in scope of this Business Partner & Supplier Code of Conduct or without sufficient evidence.

Grievance investigation process will be managed in a timely and efficient manner and non-anonymous grievance will be informed about the outcomes of the investigation process.

INSPECTION AND AUDIT

Inspection: We reserve the right to confirm compliance with these principles and to conduct compliance audits at our business partners & suppliers and their own business partners & suppliers and subcontractors. Our business partners & suppliers must provide all necessary information and facilitate access by representatives of Bulgari seeking to verify compliance with the requirements in this Code. Business partners & suppliers must commit to improving or correcting any deficiencies identified. Bulgari may also support its business partners & suppliers in implementing and applying best practices in order to resolve minor non-conformity issues.

Accurate records and access to information: Our business partners & suppliers are required to keep proper records to demonstrate compliance with this Business Partners & Supplier Code of Conduct. They must provide our representatives with access to complete, original and accurate records.

Date:

Name and address of supplier:

Name and position of supplier representative:

Signature:

Chop (if applicable):