

# BULGARI

## HUMAN RIGHTS POLICY

Bulgari is committed to respecting all Human Rights within its own operations and to promoting the adherence to the same Human Rights standards among its contractors, suppliers and business partners.

Bulgari commits to comply with all applicable laws and actively disseminates the principles established by the national and international regulations and standards, including:

- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the core Conventions;
- UN Guiding Principles on Business and Human Rights;
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

When national legislation or other applicable regulations address the same issue as this Human Right Policy, the highest standards or most restrictive principles shall apply. When this Human Right Policy is in contradiction with applicable laws, the applicable law shall apply.

### OUR COMMITMENTS

Bulgari is committed to identifying, preventing and mitigating Human Rights risks across its own operations and supply chain. Whenever adverse Human Rights impacts are identified, Bulgari is committed to providing for, or supporting, legitimate processes to enable the remedy of any adverse Human Rights impacts that Bulgari may have caused, contributed to cause or been linked with. Bulgari is also committed to communicating with its stakeholders about the Human Rights due diligence process and about how impacts are addressed.

Bulgari is committed to respecting Human Rights in its conduct, in particular as follows:

- **Prohibition of child labor** – Bulgari never engages in, supports or tolerates child labour, including the worst form of child labour (as defined by ILO Convention No.182). Work by children under the age of 16 is strictly prohibited. In countries where local laws set a higher age for child labor or set an age higher than 16 for completion of compulsory education, the highest age is applicable.

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Any work that is likely to jeopardize children's health, safety or morals should not be undertaken by anyone under the age of 18.

- **Prohibition of forced/compulsory labor** – Bulgari condemns any use of forced or compulsory labor as defined by ILO Convention No.29; slavery; servitude; any form of modern slavery; human trafficking or the use of any other constraints.
- **Prohibition of harassment and abuse** – Bulgari does not tolerate and condemns 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** – Every individual must be treated with respect and dignity. Bulgari does not engage in and tolerate 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** – Bulgari acknowledges the right of its employees to form or take part in organizations aimed at defending and promoting their interests and does not interfere with their choices. It also recognizes their right to be represented, within the various work units, by unions or other forms of representation elected in accordance with the legislations and practices in force in the different countries of employment.
- **Health and Safety** – Bulgari is committed to ensuring high health and safety standards; it promotes the dissemination and reinforcement of a safety culture by developing risk awareness and fosters responsible behavior, including through information and training activities.
- **Respect for diversity and non-discrimination** – Bulgari rejects any form of discrimination and is committed to promoting equal opportunities, both upon establishment of the employment relationship and at each stage of its performance and across its value chains.
- **Business integrity** – Bulgari requires exemplary integrity from its employees, business partners and suppliers in the conduct of their business in line with principles of the LVMH Code of Conduct and the Business Partner & Supplier Code of Conduct.

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## SCOPE

In order to implement the commitment made in this document, Bulgari will set up appropriate due diligence processes, at its own operations and supply chain level, involving the relevant functions to the extent of their respective areas of responsibility.

To support this process, Bulgari is committed to building the awareness and knowledge of its employees and workers on Human Rights and to promoting Human Rights awareness and respect across its value chain.

This Policy is applicable to all business activities carried out by Bulgari S.p.A. and its subsidiaries worldwide.

## GRIEVANCE

Bulgari is committed to adopting an open and transparent approach in managing stakeholders' expectations. Therefore, any concerns regarding impacts that may arise from Bulgari's direct and indirect behaviors under this Policy 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](mailto: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 legislations by duly authorized 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 that are not in the scope of this Policy or lacking sufficient evidence.

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

## **RELATED POLICIES AND DOCUMENTS**

*International references and voluntary standards:*

Universal Declaration of Human Rights; International Covenant on Civil and Political Rights; International Covenant on Economic, Social and Cultural Rights; ILO Declaration on Fundamental Principles and Rights at Work and the core Conventions; UN Guiding Principles on Business and Human Rights; OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; 2030 Agenda for Sustainable Development of the United Nations; RJC Code of Practices.

*LVMH related codes, policies and documents:*

LVMH Code of Conduct; LVMH Social Responsibility Report.

*Bulgari related policies and documents:*

Business Partners and Suppliers Code of Conduct; Responsible Sourcing Policy for Mineral Supply Chain; Health and Safety Policy, Bulgari Modern Slavery Act Statement; Suppliers Risk Management Procedure.

## **COMMUNICATION**

This Human Rights Policy is communicated to all employees and it is publicly available to share our values and commitments with external stakeholders.

## **RESPONSIBILITY AND SIGNATURE SECTION**

Overall responsibility for this Policy resides with the CEO.

*July 2020*

*Signature:*

*Jean-Christophe Babin  
Chief Executive Officer*