

BVLGARI

RESPONSIBLE SOURCING POLICY FOR MINERAL SUPPLY CHAINS

At Bulgari, we are committed to conducting our business responsibly in line with the principles and values of the LVMH Code of Conduct.

This ethical approach includes taking all possible measures to ensure that the materials we use in our products are sourced from businesses that follow the law, respect the rights of workers and the communities in which they operate.

To this end, Bulgari implements this policy on responsible sourcing throughout our supply chain of diamonds, gold, silver, platinum group metals (PGMs), and colored gemstones (hereinafter referred to as our raw material supply chains).

This policy is intended to affirm our commitment to respect human rights, avoid contributing to finance conflicts and comply with all applicable laws, regulations and national and international conventions, relevant UN sanctions and resolutions.

OUR COMMITMENTS

Bulgari is a certified member of the Responsible Jewellery Council, which assures, through an independent third-party verification, that Bulgari's facilities are properly managed, and that the relevant raw materials listed above and used in its products are responsibly sourced from mining to retail.

Bulgari commits 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. To that end, we work with our business partners and suppliers:

- to identify whether we source raw materials that originate in or are traded through conflict-affected or high-risk areas,
- to implement due diligence processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- to establish a system to continually monitor the supply chains and the due diligence efforts of our suppliers for information relevant to the sourcing of raw materials from conflict-affected and high-risk areas (CAHRAs).

Serious abuses associated with the extraction, transport or trade of raw materials sourced from CAHRAs

Bulgari will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labor;
- the worst forms of child labor;
- human rights violations and abuses; or

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- war crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with our upstream suppliers if we find a reasonable risk that they are committing abuses as described above or are sourcing from, or linked to, any party committing these abuses.

Direct or indirect support to non-state armed groups

Bulgari will not tolerate direct or indirect support to non-state armed groups, including, but not limited to, procuring raw materials from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- control mine sites, transportation routes, points where raw materials are traded and upstream actors in the supply chain; or
- tax or extort money or raw materials at mine sites, along transportation routes or at points where raw materials are traded, or from intermediaries, export companies or international traders.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups as described above.

Public or private security forces

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the applicable law, including the laws that guarantee human rights. We will not provide direct or indirect support to public or private security forces that commit abuses or act illegally as described above.

Bribery and fraudulent misrepresentation of the origin of raw materials

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of raw materials, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of raw materials.

Money laundering and financing of terrorism

We will support and contribute to efforts to eliminate money laundering and financing of terrorism where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of raw materials.

Gold Sourcing

We commit to implementing the OECD Due Diligence Guidance Supplement on Gold in our operations and supply chains and we require our business

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partners and suppliers in the gold supply chain to implement the same Guidance.

Diamond Sourcing and Kimberley Process

We only buy or sell diamonds that are fully compliant with the Kimberley Process Certification and we comply with the World Diamond Council (WDC) System of Warranties (SoW). 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 recommendations and to comply with all applicable laws relating to the international trade of diamonds in the countries where they operate.

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.

Coloured Gemstone Sourcing

We are committed to implementing the due diligence on the colored gemstones supply chain in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

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 Gemstones Working Group or, if members of the RJC, the RJC Code of Practices where that applies to coloured gemstones.

SCOPE

In order to implement the commitment made in this document, Bulgari will set up appropriate due diligence processes, at the supply chain level, through the relevant functions involved, 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 and to promoting the commitments of this policy across its value chain.

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

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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 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
- by post to this address: Bulgari SpA - Legal Department – Lungotevere Marzio, 11 - 00186 Rome (Italy)

In handling such reports, Bvlgari 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 authorized personnel; data will not be disseminated and will be kept by Bvlgari 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 Policy or without sufficient evidence. 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:

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; RJC Code of Practices; System of Warranties Guidelines (World Diamond Council);

LVMH related codes, policies and documents:

LVMH Code of Conduct; LVMH Environmental Responsibility Report.

Bulgari related policies and documents:

Business Partner and Suppliers Code of Conduct; Human Rights Policy; Bulgari Modern Slavery Act Statement; Suppliers Risk Management Procedure.

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COMMUNICATION

This Responsible Sourcing Policy is communicated to all employees and it is publicly available in order to share our values and commitments with external stakeholders as well as contribute to spread the culture of Responsible Sourcing.

RESPONSIBILITY AND SIGNATURE SECTION

Overall responsibility for this Policy resides with the CEO.

July 2020

Signature:

*Jean-Christophe Babin
Chief Executive Officer*