

BVLGARI



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 encourages open communication and dialogue within the Maison and with its external partners, suppliers and clients ("stakeholders").

Any Bulgari employee or external stakeholder who becomes aware of violations or has any concerns regarding impacts that may arise from Bulgari's direct and indirect behaviors under this Policy is invited to raise their concerns and/or ask for guidance.

To do so, all employees and stakeholders can access to the **LVMH Alert Line**, an online interface that provides a fully confidential and secure way of reporting in good faith violations of the laws, regulations, principles, and policies of conduct.

Follow this link to access the **LVMH Alert Line**: <https://alertline.lvmh.com/>

Bulgari ensures that no disciplinary sanction or any direct or indirect retaliatory measure is taken against persons who have made use of these channels in good faith, even if the facts subsequently prove to be inaccurate or unfounded and/or do not give rise to any proceedings or sanctions.

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-

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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.

Signed on July 2020 by the Chief Executive Officer, Jean-Christophe Babin

Updated on May 2022 with regard to the section Grievance