

*LVMH Group*  
*Supplier code of conduct*

# LVMH

## *Supplier code of conduct*

The LVMH Group (the “LVMH Group”)<sup>1</sup> comprises exceptional Maisons that design, create, manufacture and/or sell high quality products or services. The LVMH Group attaches great importance to ensuring that its suppliers (including, but not limited to service providers, distributors, manufacturers, landlords, as well as any third party which has a relationship with any entity within the LVMH Group) and their subcontractors (collectively, “Suppliers”) share a set of common rules, practices, and principles with the LVMH Group with respect to labor standards and social responsibility, protection of the environment, and ethics and business integrity.

Consequently, the LVMH Group establishes and promotes exemplary relations with all its Suppliers anchored in responsibility, fairness, and integrity.

The LVMH Group therefore requires its Suppliers to respect the principles set forth in this Supplier Code of Conduct (“Code”) and to ensure that their own suppliers do the same in the conduct of their activities for the LVMH Group.

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In the conduct of its activities, the LVMH Group 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 labor standards and social responsibility, protection of the environment, and ethics and business integrity.

The LVMH Group expects its Suppliers to apply the same respect for applicable laws, regulations, conventions, and ethics and business principles in the management of their own companies. Hence, the LVMH Group requires strict compliance with these standards by its Suppliers.

When national legislation or other applicable regulations and this Code address the same topics with different standards, the highest standards and the most restrictive provisions shall apply.

The LVMH Group works with Suppliers which agree to comply with the requirements of this Code and with the principles stipulated in the Conventions of the International Labour Organization, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Women’s Empowerment Principles and agree to ensure that their own suppliers do the same in the conduct of their activities for the LVMH Group.

In the event of non-conformity with this Code by a Supplier, each of the entity(ies) within the LVMH Group which has a business relationship with such Supplier reserves the right to require correction of the violations, suspend purchases, refuse to take delivery under any purchase order and return any goods from the Supplier until the non-conformities have been corrected, and may terminate its business relationship with the Supplier, in addition to any other rights or remedies available to such entity(ies) within the LVMH Group.

<sup>1</sup>The LVMH Group: references in this Code to the LVMH Group include LVMH Moët Hennessy Louis Vuitton SE and each of the entities which are directly or indirectly controlled by LVMH Moët Hennessy Louis Vuitton SE which may act independent of the other including in the control of the information as provided in this Code.

# *1. Labor Standards and social responsibilities*

The LVMH Group requires its Suppliers to exhibit exemplary social responsibility in their conduct.

## **PROHIBITION OF CHILD LABOR**

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 for completion of compulsory education higher than 16, the highest age is applicable. Workers under the age of 18 shall not perform any overtime or hazardous work or work a night shift. Suppliers may use lawful, legitimate, properly-managed workplace apprenticeship programs, such as student internships.

## **PROHIBITION OF FORCED LABOR AND HUMAN TRAFFICKING**

The LVMH Group does not tolerate any form of abusive or illegal labor in its supply chain such as forced labor or human trafficking. All forms of forced labor, slavery, servitude or trafficking in human beings by Suppliers, as well as 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. Suppliers must respect workers freedom of movement. Suppliers cannot require workers to work to repay a debt to them or to a third party.

## **PROHIBITION OF ILLEGAL, CLANDESTINE, AND UNDECLARED EMPLOYMENT**

Suppliers are required to comply with all applicable regulations to prevent illegal, clandestine, and undeclared employment.

## **PROHIBITION OF HARASSMENT AND ABUSE**

Suppliers are expected to treat their workers with respect and dignity. Suppliers must refrain and prohibit any behaviors and practices that cause any form of corporal punishment, physical, sexual, verbal, or psychological harassment or any other kind of abuse.

## **PROHIBITION OF DISCRIMINATION**

The LVMH Group expects its Suppliers to treat all workers equally and fairly. 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, ancestry or social background.

## **FAIR WAGES AND BENEFITS**

Suppliers must at minimum pay accurate wages in legal tender, in a timely manner and on a regular basis, 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, Suppliers 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. Wages must be sufficient to meet the workers' basic needs and provide some discretionary income. Wage deductions shall not be used as a disciplinary measure. Suppliers must communicate pay structure and pay periods to all workers. The LVMH Group requires its Suppliers to guarantee that all workers receive benefits stipulated by applicable law or in any applicable collective bargaining agreements, company agreements, and other applicable negotiated individual or collective agreements.

## **WORKING HOURS**

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. Suppliers cannot impose excessive overtime hours. The total number of hours worked per week including overtime cannot exceed legal limits. Workers are entitled to at least 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.

## **FREEDOM OF ASSOCIATION**

The LVMH Group requires its 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. When applicable, Suppliers must provide workers' representatives with appropriate means to exercise their rights. Intimidation, threats, or discriminatory practices against workers' representatives are prohibited.

## **ENSURING HEALTH AND SAFETY**

In line with the LVMH Health & Safety Policy, Suppliers are expected to provide their workers with a safe and healthy workplace environment in order to avoid accidents, bodily injuries, or exposure to danger which may be caused by, related to, or result from their work, including during the operation of equipment, of chemical products, or during work-related travel. 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. Suppliers are required, at a minimum, to comply with all applicable local and international regulations and laws in this regard. Health and safety instructions must be put in place and widely communicated. Compliance by workers must be regularly evaluated. Workers must be provided with protective equipment appropriate to their activities. These same principles are applicable to housing provided by Suppliers.

## **PROTECTING LOCAL COMMUNITIES**

As a responsible and committed group present around the world, the LVMH Group strives to have a positive influence on the societies and regions in which it operates, prevent any damage to local communities and requires its Suppliers to apply the same behavior. When operating with indigenous communities, as defined by the United Nations Declaration on the Rights of Indigenous Peoples, Suppliers must seek free, prior, and informed consent (FPIC) and ensure their human rights capacity.

## *2. Environmental compliance and performance*

The LVMH Group has established an environmental strategy and takes concrete measures to protect the environment within the scope of a specific program which includes cooperation with its Suppliers to ensure application of best practices throughout the supply chain.

The LVMH Group expects its Suppliers to share this commitment. It encourages initiatives by its Suppliers to reduce the environmental impact of their activities, notably through the use of green technologies and to share environmental figures with the entities within the LVMH Group with which they have a business relationship when needed.

The LVMH Group requires that its Suppliers respect applicable local and international environmental laws, regulations, and best professional standards, obtain all requisite environmental permits, and that they be able to prove effective implementation of the following:

### **OPERATIONS (SITES, MANUFACTURE...)**

- Application of an environmental management system (such as LWG certification for tanneries, ZDHC program for fashion and leather goods Suppliers or ISO 14001 certification);
- Improvements in the environmental performance of their sites and production resources, in particular through proper waste management, elimination of air, waste water, and soil pollution (including aquifers), reduction of greenhouse gas emissions with an emphasis on use of renewable energies, reduction of water and energy consumption;
- Measures to ensure that workers whose activities have direct environmental impact are trained, skilled, and have the resources required to effectively perform their work in consideration of these environmental commitments.

### **RAW MATERIALS, COMPONENTS, AND PRODUCTS**

- Contributions to continuous improvements in environmental performance throughout the lifecycle of the products of the LVMH Group. For instance, Suppliers are committed to share with the entity(ies) within the LVMH Group with which they have a business relationship the most responsible options (certified materials, recycled materials, materials sourced with regenerative agriculture practices...), when reasonably available. Finished or semi-finished products bearing distinctive trademarks, design rights or other intellectual property assets belonging to entities within the LVMH Group that have not been ordered or have been refused, should be managed as instructed by the relevant contact person within the LVMH Group;
- Measures to ensure safe chemical management and chemical compliance of products and raw materials with either applicable national and international regulations and best professional standards, including REACH regulations and the LVMH Restricted Substances List;
- Measures to preserve biodiversity and ensure compliance with relevant environmental international standards and regulations such as CITES;
- Measures to ensure a zero illegal deforestation and zero deforestation in high risk areas;
- Measures to guarantee traceability, share information with regard to raw material origin, and compliance for raw materials and substances used;
- Measures implemented across the supply chain to respect animal welfare and implementation of the requirements defined in LVMH Animal Based Raw Materials Charter.

### *3. Ethics and business integrity requirements*

The LVMH Group requires exemplary integrity from its Suppliers in the conduct of their business activities. The LVMH Group expects its Suppliers to act in full compliance with applicable local, national, and international laws and regulations in the conduct of their business, in particular in the following areas: prohibition of corruption and money-laundering, respect of competition, prevention of insider trading and protection of personal information.

#### **PROHIBITION OF ALL FORMS OF CORRUPTION**

The LVMH Group applies a zero-tolerance policy concerning corruption and influence peddling. The LVMH Group expects its Suppliers to take appropriate measures to prevent, detect, and discipline any corruption or influence peddling, directly or indirectly, across the scope of their activities. This includes a prohibition of so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

#### **GIFTS AND INVITATIONS**

Gifts or invitations may be considered acceptable expressions of courtesy within the context of good business relations as long as they are limited in scope and value, given openly and transparently, permitted under applicable law and regulations, 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 anti-corruption regulations or other legal requirements, making it essential for Suppliers to commit to comply with applicable rules and regulations within the scope of their business relationship with any member of the LVMH Group.

#### **PREVENTION OF CONFLICTS OF INTEREST**

The LVMH Group requires its Suppliers to be committed to make every effort to prevent the occurrence of situations that create an actual, perceived, or potential conflict of interest within the scope of their business relationship with any member of the LVMH Group.

#### **PROHIBITION OF MONEY-LAUNDERING**

The LVMH Group requires its Suppliers to take all appropriate measures to prevent their operations from being used as vehicles for money-laundering.

#### **RESPECT OF COMPETITION**

Suppliers commit to take all appropriate measures to prevent abuse of dominant position, concerted practices, or unlawful agreements between competitors, such as the setting of prices or price ranges (price fixing) or market allocations or boycotts limiting the production of certain products.

#### **PREVENTION OF INSIDER TRADING**

The LVMH Group requires its Suppliers to refrain from selling or buying shares in LVMH – Moët Hennessy Louis Vuitton SE (“LVMH shares”), as well as any derivatives or any other financial instruments linked to LVMH shares<sup>2</sup>, based on inside information, either directly or indirectly.

<sup>2</sup> Financial instruments linked to the LVMH shares include shares in Christian Dior SE.

## **CONFIDENTIALITY**

The LVMH Group requires its Suppliers to commit 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 the LVMH Group.

## **PROTECTION OF PERSONAL INFORMATION**

The LVMH Group requires its Suppliers to take all appropriate measures to comply with all applicable laws and regulations concerning the protection of personal information.

## **CUSTOMS AND SECURITY AUTHORITIES**

The LVMH Group requires its Suppliers to comply with applicable customs laws and regulations, including those relating to imports and the ban on transshipment of merchandise to the importing country.

## **TRADE RESTRICTIONS AND INTERNATIONAL SANCTIONS**

The LVMH Group requires its Suppliers to respect all applicable international trade restrictions and economic and trade sanctions, taking into account any changes in these measures, as well as all applicable laws and regulations concerning export and import controls.

## **PROTECTION OF ASSETS**

Suppliers are required to take all necessary measures to protect the resources and assets of the entities within the LVMH Group with which they have a business relationship, in particular their brand image and intellectual property rights.

## **PUBLIC STATEMENTS**

The LVMH Group expects its Suppliers to be extremely attentive to their public statements, particularly on the Internet and in social media, and to ensure that none of those statements be attributed to any entity belonging to the LVMH Group or their shareholders, directors, officers or employees, and are consistent with Suppliers' commitment to both confidentiality and respect of professional secrets.

## **INFORMATION TRANSPARENCY**

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.

## *4. Supplier grievance mechanism and LVMH Alert Line*

### **SUPPLIER GRIEVANCE MECHANISM**

Suppliers must establish processes or mechanisms by which workers and stakeholders can raise issues of concern without fear of retaliation or negative impact.

### **LVMH ALERT LINE**

Suppliers which become aware of violations (or risk of violation) of the LVMH Code of Conduct, guidelines, principles and policies and/or of applicable laws and regulations are invited to raise their concern to their contact person(s) in the entity(ies) within the LVMH Group with which they have a business relationship. In addition to this channel for raising ethical and other concerns, Suppliers have access to the LVMH Alert Line, an online interface that provides a confidential and secure way of reporting in good faith violations (or risk of violation) of the LVMH Code of Conduct, guidelines, principles and policies and/or of applicable laws. A Supplier's relationship with the LVMH Group will not be affected by a report of potential misconduct made in good faith.

The LVMH Alert Line, which is also open to LVMH Group's employees and other external stakeholders, can be accessed through LVMH.com or directly at: <https://alertline.lvmh.com>.

## *5. Control and access to information*

The LVMH Group expects its Suppliers to ensure that adequate and effective management systems, policies, procedures, and training are in place to ensure ongoing compliance with this Code.

### **CONTROL**

Each of the entities within the LVMH Group reserves the right to control compliance with the principles set forth in this Code by Suppliers. These controls will be performed by such entities of the LVMH Group or duly mandated third parties. Any control or audit will be related to the business relationship between the relevant entity within the LVMH Group and the Supplier. If a Supplier is subject to specific professional obligations pursuant to law, any control or audit will be carried out taking into consideration these professional obligations. Suppliers must commit to improving or correcting any deficiencies identified. The entities of the LVMH Group may also support Suppliers in implementing and applying best practices in order to resolve non-conformity issues.

### **ACCESS TO INFORMATION**

Suppliers shall provide upon request any supporting documentation or information attesting full compliance with this Code.

## *6. Acknowledgement*

As a condition of doing business with an entity within the LVMH Group, the below Supplier certifies that it will comply with this Code and its requirements.

Executed as of this ..... (Day) of ..... (month), ..... (year)

Supplier Name: .....

Supplier Address: .....

Supplier DUNS #: .....

Supplier Representative Name and Position: .....

Supplier Representative Signature: .....

Chop (if applicable): .....

## ***ADDITIONAL REQUIREMENTS FOR SUPPLIERS OPERATING IN MINERAL SUPPLY CHAINS***

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 labor standards, human rights, social responsibility, protection of the environment, ethics and business integrity.

Bulgari is a certified member of the Responsible Jewellery Council whose Code of Practices is aligned with the OECD Due Diligence Guidance and the UN Guiding Principles of Business and Human Rights and as such it aims to demonstrate that the value chain, from mining to retail, is managed responsibly

As such Bulgari requires to its suppliers involved in the gold, silver, platinum group metals (PGMs), diamonds and colored gemstones supply chain to comply with relevant aspects stated below, in ways appropriate to their size and circumstances:

**Responsible Sourcing Policy:** Suppliers have to establish and implement a responsible sourcing policy that is consistent with Annex II 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, and to formally communicate it to their employees, contractors, business partners, suppliers and stakeholders;

**Human Rights:** Suppliers are expected to follow the UN Guiding Principles on Business and Human Rights; the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

**Supply Chain Due Diligence:** Suppliers have 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:** Suppliers have to avoid contributing to conflicts and put in place all the measures necessary to assure the traceability of minerals and raw materials. Moreover, Bulgari requires its Suppliers to inform Bulgari whether they source materials that originate in or are traded through conflict-affected or high-risk areas and, in such cases to provide Bulgari with the relevant information in a timely manner;

**Gold Sourcing:** Suppliers in the gold supply chain have to implement the OECD Due Diligence Guidance Supplement on Gold in their operations and supply chains.

**Diamond Sourcing:** Suppliers in the diamond supply chain, including buying and selling diamonds, (rough, polished or set in jewelry), have to implement the World Diamond Council (WDC) System of Warranties (SoW) Guidelines.

**Kimberley Process:** Suppliers involved in the international trade of rough diamonds have to comply with the Kimberley Process Certification Scheme (KPCS) requirements and recommendations and to comply with all applicable legislation relating to the international trade of diamonds in countries where they operate.

**Colored Gemstone Sourcing:** Suppliers in the colored gemstone supply chain, including buying and selling colored gemstones, (rough, polished or set in jewellery), have to implement the OECD Due Diligence Guidance and any auditable due diligence frameworks aligned with the OECD Guidance, in ways appropriate to their size and circumstances.

**Refiners:** Suppliers that are refiners shall 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:** Suppliers shall ensure that security personnel follow the rule of law and guarantee protection of human rights. Moreover, Bulgari requires its Suppliers involved in the mining and

manufacturing of diamonds, gold, silver, platinum group metals (PGMs), and colored gemstones 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:** Suppliers involved in the mining and manufacturing of diamonds, gold, silver, platinum group metals (PGMs), and colored gemstones ensure that they are not directly or indirectly complicit in offering any direct or indirect support to non-state armed groups. Bulgari 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 colored 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 colored 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:** Suppliers have to continually monitor their supply chain;

**Certifications:** Suppliers have 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:** Suppliers actively involved in the trade, production or transformation of diamonds, gold, silver, platinum group metals (PGMs), and colored gemstones have to correctly and accurately represent and disclose properties and characteristics of diamonds, gold, silver, platinum group metals (PGMs), and colored gemstones in accordance with the law and best practices. 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.

## *Acknowledgement*

Date:

Name and address of supplier:

Name and position of supplier representative:

Signature:

Chop (if applicable):