

K E R I N G



KERING CODE OF ETHICS

October 2025

CONTENTS

Foreword by François-Henri Pinault & Luca de Meo	3
Introduction	4
How our Code of Ethics Works	6
KERING AS A RESPONSIBLE EMPLOYER	7
Providing a Secure and Safe Working Environment	8
Cultivating a Respectful Work Environment Free from Discrimination and Harassment	10
Promoting an Inclusive Workplace	12
Fostering Well-Being at Work	14
KERING AS A RESPONSIBLE BUSINESS PARTNER	16
Protecting the Group's Intellectual Property	17
Valuing Know-How and Craftsmanship	19
Protecting Sensitive Information and Business Confidentiality	21
Protecting the Group's Reputation	23
Managing Business Partner Relationships with Integrity	25
Fighting against Corruption, Bribery and Influence Peddling	27
Ensuring Fair Competition	29
Complying with Export Controls and International Sanctions	31
Engaging Responsibly with the Financial Markets	33
Preventing Money Laundering and Tax Evasion	35
Identifying and Preventing Conflicts of Interest	37
Ensuring Data Security	39
Ensuring Data Privacy	41
Monitoring Gifts and Hospitality	43
Monitoring Donations and Sponsorships	45
KERING AS A RESPONSIBLE ENTERPRISE	47
Respecting Human Rights	48
Respecting Nature	50
Striving for a Positive Impact	52
Adopting Responsible Communication and Advertising	54
Promoting Mindful Innovation	56
Endorsing Responsible Lobbying	58
Conclusion and How to Report a Violation through the Whistleblowing Platform	60

FOREWORD BY FRANÇOIS-HENRI PINAULT & LUCA DE MEO

We would like to take the opportunity provided by the presentation of our Code of Ethics to strongly reaffirm our unwavering commitment to ethics, at every step of our activity and with all our stakeholders.

This key document clearly states the indispensable principles and requirements that must be implemented by all at all times, regardless of our nationality, location, position or seniority in the business.

Our culture of integrity has always been at the heart of our business and is a key enabler of our Group's short- and long-term strategy and vision.

This umbrella document aims to capture and reflect the evolving context in which we operate and to continue to address the challenges ahead of us. It allows us to remain centered around our fundamental commitments to protecting and respecting our employees, the environment, and our local communities as well as fostering solid relationships with our business partners and shareholders. It also aims to firmly underscore our zero tolerance for corruption and any other violation of our principles of integrity while conducting business.

This document is intended to be a guide when, facing a difficulty or a dilemma, recommendations are needed. It defines the standards of conduct we expect and anchors them in practice through a comprehensive list of what to do and not do in various situations. We expect all of you to carefully read and acquaint yourself with this document and to articulate your daily work around these reference points. In case of questions or needs regarding their implementation, you can contact the relevant departments or speak up through our dedicated Whistleblowing Platform.

Raising concerns and asking questions is vital for a healthy working environment and it is why protecting those who turn to the Whistleblowing Platform in good faith is an essential commitment throughout the Group. To further facilitate stakeholders in speaking up, Kering has put in place an accessible online alert system through a dedicated platform to ensure confidentiality and compliance with regulations worldwide.

Our Code of Ethics, along with our Whistleblowing Platform, is intended to give you all the tools and means to act in compliance with laws, regulations and proudly uphold our ethical principles.

It is not always easy to find the right way. That is why we have drafted these ethical principles; they are here to guide you.

Only by firmly anchoring ourselves in our collective ethical principles can we be a responsible company, continuing to challenge ourselves to act better.

Only your commitment to do the right thing will allow Kering to lead by example.

Thank you.



François-Henri Pinault
President of the Board of Directors, Kering SA



Luca de Meo
CEO Kering Group

INTRODUCTION

At Kering, we are a global luxury group dedicated to shaping the present and future of luxury with creativity, responsibility, and sustainability as core values. While honoring the rich heritage of our Houses, we remain committed to continuous transformation through imagination and innovation to meet evolving consumer expectations. With an agile mindset, our goal is to ensure that our Houses continue to inspire while upholding ethical standards worldwide.

Kering is firmly committed to complying with all applicable rules and regulations in the countries in which it operates. We always apply the highest standards of business ethics. Therefore, if local or sector-specific legislations are stricter than our Code of Ethics, we must implement the local standard. Conversely, if the principles set out in this Code of Ethics are stricter than local or sector-specific legislation, we must apply the principles of our Code of Ethics. In the event of incompatibility between the Code of Ethics and local legislation, we apply local legislation.

This Code of Ethics serves as a tool to help every employee understand how we uphold our values and commitments in our daily practice. While we recognize this document cannot anticipate every situation you may encounter in your career at Kering, it provides clear references to frame your activities and actions, as well as guidance on where to seek support when you have questions or when concerns arise.

This Code of Ethics has been drawn up taking into account the Group's corruption risk mapping and it replaces the Group's Anti-Corruption Policy. It was approved by the Board of Directors of Kering SA on October 28, 2025.

INTRODUCTION

TO WHOM DOES THIS CODE OF ETHICS APPLY?

This Code of Ethics and its key principles apply to all employees and persons with managerial or representative functions of Kering S.A. and its affiliated entities, including the Kering Foundation. This includes, but is not limited to, interns, apprentices, volunteers and temporary employees, officers, directors, presidents, and representatives of entities of the Kering Group. Kering also promotes the adoption of strong ethical standards equivalent to those described in this Code, by its stakeholders, including suppliers, partners and contractors. Ethical standards are fundamental to our way of doing business and must be upheld by all, as doing the right thing is a personal responsibility. We expect all employees to read the Code of Ethics, stay informed on its updates, understand and apply the relevant procedures, and seek guidance when needed. In particular, managers have a duty to foster this ethical culture within their teams and in interactions with third-parties and are encouraged to report any violations and manage related action plan.

SPEAKING UP AND REPORTING CONCERNS

Maintaining our ethical standards requires open communication and accountability. Kering provides a secure channel, including a Whistleblowing Platform, to allow employees and stakeholders to raise or share concerns safely. Speaking up is each employee's responsibility and it helps Kering to identify and resolve issues early. We are committed to protecting those who report in good faith, fostering a culture of transparency and trust.

CONSEQUENCES OF VIOLATIONS

Upholding our ethical principles is fundamental to preserving the integrity, reputation, and commitment of Kering to responsible business practices. Any violation of our ethical principles may be subject to disciplinary actions (e.g. warning letter or termination of employment) or lead to process or program updates. Such measures shall be appropriate and proportionate to the seriousness of the breach observed and taken in compliance with the provisions of the internal rules of procedure (or any equivalent document) and with applicable laws and regulations.

HOW OUR CODE OF ETHICS WORKS

As a multinational group, Kering operates under a structured framework of policies and procedures that support ethical decision-making and business integrity.

This Code of Ethics serves as the overarching document that sets the fundamental principles guiding all other internal policies and procedures. It provides a unified ethical foundation that aligns with international laws and best practices, ensuring consistency across all entities and regions. More detailed policies and procedures allow its implementation and required adaptation.

In this Code of Ethics, the approach of Kering with its various stakeholders is organized through different fact sheets.

A standardized structure has been adopted to ensure accessibility and to support informed decision-making in alignment with Kering's values and commitments.

KERING AND ITS EMPLOYEES

KERING AND ITS BUSINESS PARTNERS

KERING AS A RESPONSIBLE ENTERPRISE

As such, every factsheet follows the same structured approach:

- An introduction outlining its purpose;
- A definition of key terms to clarify essential concepts where applicable;
- A practical "do & don't" section to illustrate expected behaviors and;
- A Q&A section addressing common dilemmas.

A section with applicable references for further guidance and point of contacts for any additional questions or concerns are also provided.





KERING AS A RESPONSIBLE EMPLOYER

PROVIDING A SECURE AND SAFE WORKING ENVIRONMENT

At Kering, safety, security, and physical and mental health at work are a priority. Kering is committed to ensuring the safety and well-being of its employees and all people working at its sites (offices, boutiques, factories, workshops, warehouses).

Kering promotes a culture of risk prevention and encourages its employees to play an active role in the health and safety framework at work.

DO

- Demand that every means be put in place to achieve the objective of zero accidents;
- Ensure that all employees commit to adopting a health and safety protection approach at work;
- Promote a culture of prevention by offering the right tools to all employees;
- Actively partake in the culture of prevention by utilizing the tools and training provided to ensure our health and safety.

DON'T

- Put oneself or others at risks by failing to take the necessary preventive measures to ensure personal safety or that of others;
- Fail to address critical issues or concerns when a task is perceived as dangerous or when proper training has not been received;
- Ignore risky situations or fail to react when a work-related situation endangers employees' health or safety;
- Tolerate disrespectful behavior that may have an impact on employees' health.

FAQS

As employees, how does Kering encourage us to play an active role in our own health and safety at work?

Employees play an active role in preventing occupational health issues, whether linked to physical working conditions or psycho-social risks.

You are expected to follow health and safety regulations, use the tools and expertise provided on demand by the Group, and take part in both online and in-person training. These programs help you build the skills needed to work safely and take preventive measures to protect yourself and others.

Beyond physical safety, you are encouraged to stay attentive to your own well-being at work and that of your colleagues and discuss any issues that arise with your manager. You are also invited to share your views through the annual Listening surveys, which assess well-being in the workplace. Your feedback is essential to help managers and relevant departments adjust their actions and continuously improve working environments.

What should I do if I witness a safety or security problem?

You are expected to take immediate action by reporting any shortcomings or situations that could pose a safety or security risk. You must alert your manager, your Human Resources Manager, or your Safety and Security Manager as soon as a potential issue is identified. Speaking up is essential to maintaining a safe and secure work environment for everyone.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Global and/or Local Health and Safety Policy
- Kering Human Rights Policy
- Kering Global Policy on Domestic Violence
- European Works Council (EWC) agreement on social dialogue and well-being at work

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Your manager
- Your Human Resources Manager
- Your Safety and Security Manager



CULTIVATING A RESPECTFUL WORK ENVIRONMENT FREE FROM DISCRIMINATION AND HARASSMENT

Respect for our employees is the foundation of everything we do at Kering. Kering is committed to a workplace free from discrimination, harassment and violence. We offer our teams an open, welcoming, and stimulating work environment by promoting equal opportunities and fair treatment for all employees, regardless of their background, identity, or personal circumstances.

- **Discrimination** is when a person (or a group of people) experiences unequal treatment due to a particular characteristic, such as gender, age, ethnic or social background, disability, sexual orientation, gender identity, or any other characteristic protected by applicable law.
- **Harassment** takes the form of repeated acts with the purpose or effect of creating a hostile or offensive work environment and worsening the working conditions of the person subjected to them.

DO

- Respect the dignity and rights of every individual;
- Encourage open communication. Report any disrespectful or discriminatory remarks, behavior, actions, gestures or written communication.

DON'T

- Engage in any practice likely to characterize harassment, including expressions, gestures or comments;
- Tolerate any sort of harassment, discrimination, intimidation, bullying or humiliating behavior around us, whether psychological, sexual or constituting an abuse of power based on age, gender, gender identity, sexual orientation, disability, religion, ethnic, social, cultural or national origin;
- Tolerate racist, sexist, homophobic, or transphobic remarks or behaviors.

FAQS

What can I do if I experience discrimination?

Kering stands firmly against all forms of discrimination. If you believe you have been the victim of discrimination, you should share it with your manager, Human Resources Manager or raise your concern through the Whistleblowing Platform.

I am interviewing a candidate for a position on my team, and during the interview, I learned that they have a disability. I'm worried about how this might affect their ability to perform the job. How should I approach this situation?

During the recruitment process, focus your attention on the candidate's skills and experience relevant to the position. It's important to avoid making assumptions about their ability to perform the job based on their disability. If you have specific concerns about how the candidate might perform certain tasks, ask them about their experience and strategies for managing those tasks. If you believe the candidate is the best fit for the role, extend an offer of employment. Remember, you cannot discriminate against someone based on their disability. Upon hiring, contact your Human Resources Manager or the designated contact person according to local legislation to ensure they have the reasonable accommodations they need.

I am considering promoting a member of my team, but they recently announced they're expecting a baby. I'm worried that becoming a parent might impact their ability to fully commit to the new role. Should I reconsider my decision?

Do not make assumptions about someone's work commitment based on their parental status. At Kering, we strongly support our employees during major life events, including welcoming a new baby. The Group's Baby Leave policy supports new parents, enabling them to balance their new family life with their career goals.

I am experiencing domestic violence from my partner. What should I do?

At Kering, we are strongly committed to supporting and empowering our employees. Kering has launched its Kering Global Policy on Domestic Violence, a global framework and support for any Group employee worldwide who is experiencing or has experienced domestic violence and who chooses to disclose it. It outlines a variety of measures to ensure that no matter the nature of the domestic violence situation, any employee in need can receive personalized support, completely confidentially.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Inclusion and Diversity Policy
- Kering Human Rights Policy
- Kering Global Policy on Domestic Violence
- European Works Council (EWC) agreement on social dialogue and well-being at work

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Human Resources Manager or Inclusion and Diversity leader
- Kering Foundation



PROMOTING AN INCLUSIVE WORKPLACE

At Kering, we champion exceptional creativity with a purpose to inspire positive change. As an influential luxury group, we aim to promote inclusion and diversity, the wellspring of creativity and innovation.

We actively cultivate a diverse and inclusive workplace with the aim of ensuring everyone feels respected, valued, and empowered to contribute. This is not just a goal; it is a living commitment embedded in everything we do.

- **Inclusion** is creating a sense of belonging where each individual is valued, respected and treated equitably. An inclusive culture allows all employees to contribute, thrive, and develop.
- **Diversity** is any dimension, visible and non-visible, including personal identities (gender, age, nationality, etc.) and backgrounds, that can be used to differentiate people and groups from one another. It is about empowering people by respecting and appreciating what makes them different.

DO

- Commit to achieving gender equality by ensuring gender parity and reducing the gender pay gap at all levels of the organization;
- Provide equal opportunities, regardless of cultural background, age, origin, socio-economic status, gender identity, and sexual orientation;
- Harness the strengths of a multigenerational workforce and promote cross-generational collaboration;
- Support an inclusive workplace for people with disabilities, adapting the work environment and raising awareness among employees.

DON'T

- Accept or tolerate stereotypes that undermine inclusion, equity and diversity;
- Spread false or malicious information about colleagues;
- Criticize or reprimand a colleague for voicing their discomfort about a disrespectful situation.

FAQS

My colleague makes fun of my accent and tells jokes about my native country during our team meetings. This makes me upset and demotivated. What should I do?

This is offensive and not appropriate. You should raise your concerns with your manager and report any disrespectful behavior. You can also contact your Human Resources Manager to report the problem.

I sometimes hear inappropriate jokes about LGBTQIA+ people during coffee breaks, and I'm not sure how to react. What should I do?

Inappropriate jokes are not acceptable. Try to address the behavior directly with your colleague. Explain how their actions make you feel and ask them to stop. They may not realize how harmful and disrespectful their words can be. You can also seek help from your Human Resources Manager or Inclusion and Diversity leader (as applicable).

I am going to become a parent. What are the parental leave policies and benefits at Kering?

At Kering, we want our employees to be fully supported during important life events. That's where Baby Leave comes in: to give all parents the opportunity to welcome their new child in the best conditions. Baby Leave is available to all Kering employees — regardless of gender, family circumstances or where they are in the world — and provides standardized parental leave for new parents. This is applicable if you are welcoming a new baby or child into your family.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Inclusion and Diversity Policy
- Kering Human Rights Policy
- Kering Baby Leave Policy
- European Works Council (EWC) agreement on social dialogue and well-being at work

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Human Resources Manager or Inclusion and Diversity leader



FOSTERING WELL-BEING AT WORK

At Kering, we are dedicated to fostering a positive and fulfilling work environment where our people can grow and succeed. We have made well-being a long-term priority, deepening our efforts with a shared definition and a formal agreement reached through dialogue with our European Works Council. Across all our locations, this commitment also means ensuring time to rest and work-life balance, with paid vacation and the right to disconnect, as well as supporting the continuous development of each employee's skills and offering career opportunities.

DO

- Respect and support employees' rights to freedom of association and collective bargaining by fostering open, constructive dialogue between all employees and their representatives, as applicable;
- Advocate for a culture of collaboration and feedback between managers and employees using provided tools;
- Encourage skills development through training, mobility, and meaningful feedback as well as by creating space and providing tools for employees to grow professionally while contributing to team success.

DON'T

- Normalize after hours or rest period availability;
- Ignore excessive workload situations;
- Leave an employee without help in a difficult situation;
- Provide employees with zero feedback on their performance and career opportunities.

FAQS

During an in-person conversation with one of my team members, they share they have been feeling stressed about the heavy workload and tight deadlines. What should I do?

As a manager, you play a crucial role in supporting employees experiencing difficulties at work and helping to alleviate these difficulties. Here are three essential practices you should follow:

- Listen actively to your team member and learn to detect signals of fatigue or distress, such as lack of focus and low engagement.
- Understand how to support them. For example, you can work together to adjust workload organization and help prioritize tasks.
- Create a safe space where every employee feels comfortable sharing their difficulties. By following these practices, you can ensure that employees feel supported and that their concerns are addressed appropriately.

And as an employee, how can I get help?

Speak up. Talk with your manager and Human Resources Manager to share your difficulties. Discuss and explore the options available to help you reduce stress and its effects.

As a manager with teams across different continents, some team members receive my emails late in the evening due to time zone differences. Recently, employees have been expressing concerns about after-hours communication affecting their work-life balance. How can I avoid this issue?

You may refer to the Charter on disconnection, which includes recommendations for healthy digital habits, such as remembering to disconnect, respecting everyone's working hours and rest periods, and regaining control of means of communication to improve concentration and reduce stress linked to hyperconnectivity. You can also use your mailbox's "Send Later" feature or schedule messages to avoid sending communications outside business hours.

I am a new manager and I shared individual objectives with each of my team members by email. One of them is not performing as expected and not achieving their goals.

Sharing objectives and goals by email or on-the-go is not a good way to empower team members to deliver performance. At Kering, we ensure managers have the right processes and support to be able to:

- Discuss goals and set clear objectives so people know what is expected of them in their current role, and to develop their career perspectives;
- Have regular conversations to assess their team members and give feedback.

Remember that having the bigger picture of what is expected of them helps your team members to understand their objectives, stay motivated, and perform.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Global and/or Local Health and Safety Policy
- Kering Human Rights Policy
- Kering Baby Leave Policy
- Kering Charter on the Right to Disconnect
- Kering Global Policy on Domestic Violence
- Kering Charter on the Working Relations with Fashion Models and their Well-Being
- Kering Inclusion and Diversity Policy
- European Works Council (EWC) agreement on social dialogue and well-being at work

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Your Human Resources Manager





KERING AS A RESPONSIBLE BUSINESS PARTNER

PROTECTING THE GROUP'S INTELLECTUAL PROPERTY

The Kering Group endeavors to protect its Houses' know-how, high craftsmanship, expertise, creativity, and innovation. Intellectual Property represents a highly-value asset for the Kering Group and its Houses. These exclusive proprietary rights are present in our products as well as in all our branded materials (communication, advertising and marketing developments, online and boutique displays, runway shows, etc.). Kering follows robust Intellectual Property policies to support its Houses' creativity and innovation, brand equity, reputation, and consumer trust, as well as to protect our revenue, heritage, and intangible property rights. These policies aim to identify, verify, assess, and protect our intangible assets; preserve our exclusive ownership with due respect to the Intellectual Property rights of others; and act against third parties' misuse, infringement, counterfeiting and sale of knock-offs both online and offline through brand enforcement programs and measures.

- **Intellectual Property (IP)** includes patents, designs, trademarks, logos, trade dress, copyrighted materials, inventions, trade secrets, domain names, and all other confidential inside information.
- **Counterfeiting** is the act of reproducing, without the right-holder's authorization, an Intellectual Property right. In most countries those found guilty of counterfeiting are subject to criminal penalties.

DO

- Collaborate with the Kering Group or the respective House's Legal Department to ensure that any required clearance and search to identify and mitigate any legal or reputational risk is made in a timely fashion for all materials, naming, merchandise, and/or products prior to manufacture or to any disclosure to the public;
- If you discover third parties' products or other materials (these can be other brands' labels, shop signs, advertising, etc.) that you believe may infringe any of the Kering's Group Intellectual Property rights, please escalate the matter to the Kering Group or the respective House's Legal department with as much information as possible.

DON'T

- Facilitate the infringement and violation of the Group's or its Houses' Intellectual Property rights through the alteration, imitation, or counterfeiting of distinctive signs or of patents, industrial designs or models, or other violation of Intellectual Property protected by copyright;
- Engage in any activity or transaction that would involve the manufacture, distribution, marketing, selling or otherwise putting into the market, or promoting counterfeit merchandise, fake products, look-alikes, or any other materials infringing upon Kering Group's and its Houses' Intellectual Property rights;
- Disclose to third parties or allow the use of any of the Group's Intellectual Property without first involving the Legal department who can ensure the required contractual frame (license agreement) and, if required, prior written authorization from the Board of Directors.

FAQS

I have come across an item bearing the name of a Kering House on an e-commerce platform. Can I buy it?

While our Houses' products may be sold lawfully on certain e-commerce platforms, our Houses have very specific distribution models in line with our high-quality standards. In the event you are confronted with a suspicious or counterfeit item (poor quality packaging, labelling, quantities), avoid making any purchase but report your find to the dedicated contact points.

Working in the creative field, what should I do to respect third parties' rights if I have no knowledge of such rights or any perception of wrongdoing?

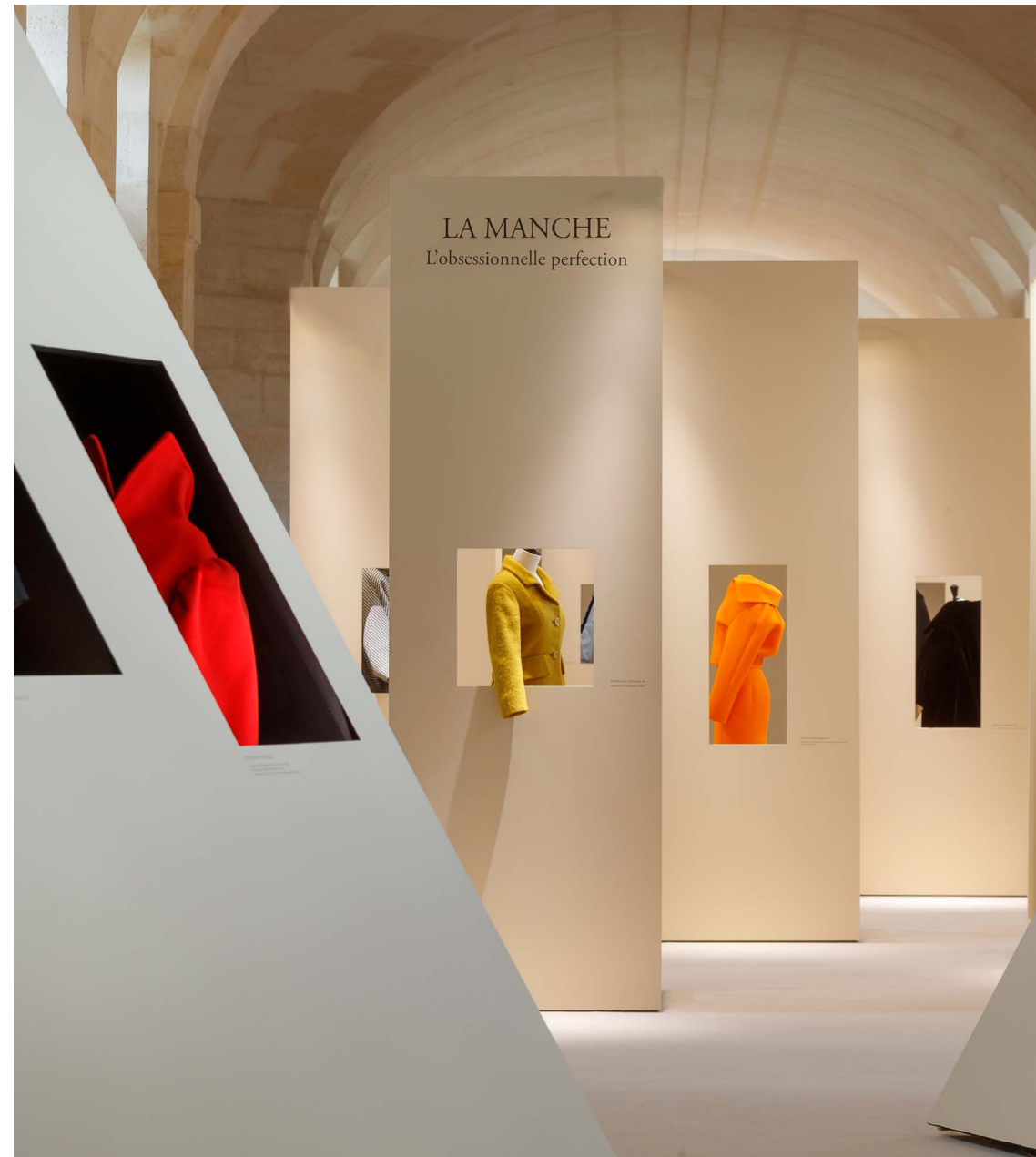
You may have some knowledge of names, shapes, concepts, prints, and advertisements that already exist on the market, but not all are free to use. Some may be protected by Intellectual Property of third parties. Your Legal/IP department can check and verify, through a dedicated process and internal control system in line with Kering IP and Brand Trust Policies, the existence of such rights through their clearance work. This will help us verify and moderate the legal and/ or reputational risks.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering IP Policy
- Kering Brand Trust Policy
- Kering Group's and its Houses' IP Clearance Policy & 231 Protocols

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Kering Legal IP department or your House's Legal department



VALUING KNOW-HOW AND CRAFTSMANSHIP

At Kering, excellence means creating exceptional products while ensuring the highest standards of quality, craftsmanship, and customer experience. We are dedicated to preserving our heritage through expert training and innovation, keeping traditional skills alive for future generations. Product safety for adults and children is a top priority, with rigorous testing and strict supplier requirements. By fostering trust, transparency, and continuous improvement, we uphold our commitment to crafting a more sustainable and responsible version of luxury.

DO

- Prioritize product quality, craftsmanship, and innovation to deliver an exceptional customer experience;
- Sustain and preserve local craftsmanship and the communities that support it by fostering knowledge transfer through dedicated academies and partnerships, while also providing structural support to local initiatives, in the spirit of promoting a just transition;
- Provide best-in-class training of our sales force to allow product knowledge and provide a seamless, personalized experience across all countries;
- Require all employees and partners to speak up if they become aware of any product safety or quality issue;
- Conduct strict checks and select raw materials and manufacturing processes aligned with Kering standards and that meet our Houses' quality and safety expectations.

DON'T

- Ignore or fail to report potential safety or quality issues in products;
- Engage in initiatives that could severely impact ecosystems, natural resources, or local communities.

FAQS

How do we promote innovation while respecting heritage craftsmanship?

We strike a balance between heritage and innovation by integrating modern technology with time-honored craftsmanship. Whether through low-impact materials, 3D design, or digital modeling, we ensure that innovation enhances artisan skills through upskilling.

What control measures do we implement?

We conduct extensive material testing, durability assessments, and compliance checks to ensure that all products meet international safety and product regulations. We also ask our suppliers to comply with our requirements.

How do we ensure a seamless customer experience?

We focus on personalization, innovation, and service excellence across all touchpoints — whether in-store, online, or through after-sales support. Our goal is to provide customers with a luxury experience that is seamless, engaging, and tailored to their needs. In that regard, we provide our sales employees with the best-in-class training and tools to support this journey to excellence.

How do we incorporate sustainability into product excellence?

Sustainability is a fundamental part of our approach to excellence. We integrate low-impact materials, responsible production methods, and circular economy principles into our designs to create products that are both luxurious and environmentally responsible.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Preservation of Craftsmanship and Know-How Policy
- Kering Human Rights Policy
- Kering Sustainability Principles
- Kering Animal Welfare Standards
- Kering Standards: Standards and Guidance for a Sustainable Production
- Product Restricted Substances List (PRSL)
- Manufacturing Restricted Substances List (MRSL)
- Kering Supplier Management Policy

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Kering Product Compliance Advisory department
- Kering Compliance department
- Kering Sustainability department



PROTECTING SENSITIVE INFORMATION AND BUSINESS CONFIDENTIALITY

Safeguarding sensitive and confidential information is essential to protecting our company's, employees', partners', and customers' interests, as well as ensuring creativity and innovation. Indeed, much of the information we create and use is purely intended for internal use or will be disclosed for a certain purpose. Unauthorized access, disclosure, or mishandling of such information could have serious legal, financial and reputational consequences for Kering and its Houses. As a result, it is everyone's responsibility to handle information securely and in line with Kering policies to best protect our company's interests and trust with our stakeholders.

- **Sensitive information** is any non-public information that could harm our company, partners or customers if disclosed improperly. This includes, but is not limited to, corporate projects and strategies, prices, investment and divestment, financial information and data, strategic business plans, product designs and know-how, and customer or employee data.
- **Need-to-know basis** means access to sensitive information must be restricted to individuals who require it for their specific responsibilities and projects.

DO

- Keep sensitive and confidential information and only share it internally with authorized individuals on a need-to-know basis;
- When participating in multi stakeholders initiatives, it should be ensured that competition rules are observed (e.g., sensitive commercial information should not be communicated to actual or potential competitors);
- Use Non-Disclosure Agreements as soon as engagement in discussions with third parties commences to protect the information shared;
- Use company-approved tools and secure networks when accessing or sharing confidential data. Store and dispose of sensitive documents securely to prevent unauthorized access;
- Immediately report any suspected data breaches or accidental disclosures to the appropriate department;
- Follow company policies on digital security and social media use to protect confidential information.

DON'T

- Store, share, or send sensitive and confidential information via unauthorized personal devices or unauthorized platforms;
- Disclose sensitive and confidential information to family, friends, or unauthorized colleagues;
- Share company-related content on social media unless officially authorized, except for content that has already been shared by the company on its official social media accounts.

FAQS

How can I balance transparency with business confidentiality?

Transparency is important, but it must be managed responsibly. Only share information that is necessary and appropriate, while ensuring confidential details remain protected. When in doubt, consult your manager or the legal team.

What should I do if I suspect a confidentiality breach?

Report it immediately to your manager or the legal team. Quick action can help prevent potential risks or damages.

Can I work on confidential documents in public places like cafés or airports?

No, working in public spaces increases the risk of unauthorized access. If absolutely necessary, use privacy screens and ensure your conversations cannot be overheard. As a general rule, do not discuss confidential or sensitive matters in public places where conversations may be overheard.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Global Information Security Policy
- Kering's Social Media Guidelines
- Best Practices guidelines available on the cybersecurity portal

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Your manager
- Kering Legal department
- Kering Finance department
- Group Chief Information Security Officer (CISO)



PROTECTING THE GROUP'S REPUTATION

Our Group's and our Houses' reputations were built over a long period and through heavy investment. Reputation is a very important intangible asset, especially in the luxury industry and in a context in which the demand for corporate responsibility and transparency has never been higher.

As such, we must always consider how our actions might affect the image of Kering and its Houses. Every employee should contribute to the protection of the Group's reputation through careful and professional behavior and by avoiding doing anything that can have a negative impact on the image and reputation of the Group and its Houses.

While everyone is free to have opinions and voice them on their own social media accounts, everyone should also be mindful of the risks associated with social media use. Specifically, everyone must ensure that their personal opinion is not conflated with the position of Kering or one of its Houses.

Corporate reputation is how people perceive you as an organization with your products, services, and behaviors. It can be influenced by many factors, including market share, brand equity, customer satisfaction, and social media sentiment.

DO

- Always ask yourself what the possible impact of your individual actions on Kering's or our Houses' reputations might be;
- Ensure that public-facing third parties who work with our Houses, such as ambassadors, are also required to comply with the Kering Suppliers and Business Partners' Charter;
- Avoid any risk of confusion between our personal opinions and those of Kering or any of our Houses;
- Use internal social platforms responsibly and for professional purposes only;
- Always bear in mind that on the Internet, nothing is ever truly secret, private or forgotten.

DON'T

- Take a position publicly on behalf of the Group or a House without being duly authorized to do so or having aligned internally on the content to be delivered;
- Speak or write publicly about topics related to the Group that are outside our area of expertise;
- Give credibility to opinions or supposed information related to the Group that are outside our area of expertise by re-sharing them without first ensuring they are reliable;
- Answer questions from media/social media representatives, external consulting firm inquiries, surveys about Kering or any professional topic related to Kering and its Houses if you are not specifically authorized by the company to do so.

FAQS

After starting a friendly discussion with a customer in my House's store, I realize that the person might be a journalist trying to make me share information that I should not. What should I do?

Politely end the conversation by saying that these are topics on which you are not authorized to comment, per your duty of confidentiality. If the person insists, politely ask them if they are a journalist or what use they intend to make of this information. If they declare themselves as a journalist, ask the name of the media outlet and refer them to the House's Press Relations department. Also inform your manager.

As a citizen, I would like to express myself on political topics that are important to me. May I do so at work?

Our Code of Ethics does not put into question freedom of speech. However, if you share your opinion publicly, you should make sure to state prior to expressing your opinion that this is a strictly personal opinion that in no way reflects the Group's opinion. You also should not express your personal opinions on social media accounts that are associated with your professional activity, including internal platforms.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Social Media Guidelines
- Viva Engage Golden Rules
- Kering Brand Trust Policy

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Brand Communication department
- Kering Corporate Communication department



MANAGING BUSINESS PARTNER RELATIONSHIPS WITH INTEGRITY

At Kering, the commitment to sustainable practices and respect for ethics and human rights is supported by the selection of its business partners all along its value chain.

As such, we have implemented policies and guidelines that define its commitments to partnerships, ensure transparency in expectations and enable a fair approach. We also require our suppliers to adhere to the Kering Suppliers and Business Partners' Charter and Kering Sustainability Principles, which outline all the requirements they must formally undertake and commit to in the same way as we at Kering do with our own suppliers.

In addition, we have established processes to monitor suppliers' compliance with our standards and requirements, ensuring consistency in due diligence and risk assessments.

DO

- Require our suppliers to adhere and comply with the Kering Suppliers and Business Partners' Charter, Kering Sustainability Principles and associated policies and ensure they take appropriate steps to effectively apply the principles of this Charter to their own suppliers and sub-contractors;
- Lead procurement activities with fairness, transparency, without favoritism and according to Kering's applicable conflicts of interest procedure;
- Conduct supplier due diligence on a risk-based approach, assessing regulatory compliance, human rights, social, sustainability commitments, financial health, reputation, and operational capabilities prior to any start of business and periodically during the duration of the business relationship;
- Ensure that procurement practices align with our business objectives, support our sustainability vision and deliver value to our stakeholders;
- Require written agreements and purchase orders before any spending commitment;
- If identified, address in a timely manner and remediate any serious situation in contradiction with Kering's values.

DON'T

- Ignore mandatory due diligence or risk assessments before onboarding a supplier;
- Commit to the budget or make decisions on the strategic relevance of a project without proper internal validation;
- Select suppliers unilaterally, without alignment with business stakeholders and the Group's values;
- Work with suppliers that do not meet quality, legal, or risk management standards.

FAQS

Why are procurement processes and calls for tenders important?

To save time, reduce costs, and add value to the project outcome by:

- Refining the need with the business, avoiding over-specification and unnecessary costs;
- Leveraging market insights to identify the most relevant solution;
- Ensuring compliance with internal policies and external regulations;
- Anticipating risks (legal, operational, financial, reputational);
- Negotiating effectively with time to conduct a robust sourcing process;
- Securing better supplier performance through structured evaluation and contracting.

How can we evaluate our suppliers' adherence to our requirements?

Following a risk-based approach, Kering monitors supplier performance and compliance first by the implementing social audit processes, and second by conducting robust and regularly updated risk assessments focusing on compliance, human rights, and environmental aspects. In addition, recurring comprehensive audits can be carried out to ensure ongoing alignment with our standards.

Suppliers' and subcontractors' employees also have access to the Kering Whistleblowing System, providing them with a secure channel to report any suspected misconduct or violations.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Human Rights Policy
- Kering Suppliers and Business Partners' Charter
- Kering Standards
- Kering Sustainability Principles
- Supplier Management Policy
- Kering Group Conflicts of Interest Procedure
- Kering Gift, Hospitality and Entertainment Procedure
- Indirect Procurement Policy

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Procurement department
- Kering Supply Chain Security & Audit department
- Group Compliance department
- Kering Sustainability department



FIGHTING AGAINST CORRUPTION, BRIBERY AND INFLUENCE PEDDLING

As an essential part of our culture of integrity, Kering has a zero-tolerance policy and strictly prohibits all forms of corruption or influence-peddling. Kering endeavors to prevent and detect corruption by acting in conformity with all applicable laws and regulations in every country in which it operates, including the French law Sapin II, the Law 231/2001 in Italy, the US Foreign Corrupt Practices Act and the UK Bribery Act. Corruption generates enormous costs, both for society at large and the individual companies at risk of corruption.

- **Corruption** is most commonly defined as the abuse of entrusted power or an entrusted position for private gain, either by a public official or someone working in the private sector. Both corrupting (“active corruption”) and being corrupted (“passive corruption”) are illegal and against Kering Group policy.
- **Influence-peddling** means abusing one’s real or alleged influence to obtain a contract or any other favorable decision from a public authority or administration. Offering, promising, or granting a benefit in order to receive this kind of influence, or accepting this kind of influence, is also illegal. As with corruption, it can be direct or indirect.

DO

- Be vigilant and transparent in interactions with public officials and government entities;
- Make appropriate integrity checks prior to entering into an agreement with a new partner or working on an acquisition project in accordance with applicable procedures;
- Inform the Compliance department if you suspect or become aware of any requests for improper payments or any suspicious signs or transactions;
- Participate in all processes transparently and fairly;
- Follow the mandatory e-learning on ethics and compliance.

DON'T

- Seek or accept an undue advantage of any kind;
- Make any improper payments to public officials or private entities, even if directed through a third party, or if business has been threatened;
- Attempt to improperly influence approvals, inspections, permits, or other government actions;
- Make facilitation payments.

FAQS

I am working on a store opening and need to obtain a permit from the local government. The store is supposed to open in two days, but we do not have the permit yet. One of our local business partners suggests that local authorities are usually more diligent with generous companies. What should I do?

Kering prohibits facilitation payments. Reach out to your Local Compliance Officer and legal team. The legal and compliance teams can help determine why the local government has not granted the permit.

A shipment is stuck in customs, causing delays in our supply chain. A member of the board of directors of one of our suppliers is a former public official who offers to speak to the customs officials on our behalf. The director says they hope we'll remember this when their daughter applies for an internship at Kering next summer. What should I do?

As a former public official, the director of our supplier is a politically exposed person who is offering to use their influence in our favor. In exchange, the director is implicitly asking that we give their daughter an internship. Even though no cash or cash equivalent is involved, providing a job or an internship is still a benefit. This is an example of corruption in the form of influence-peddling. You should say no to the director’s offer to speak on our behalf, even if the shipment is being held at customs improperly. Notify Compliance department of the director’s offer, and continue working with the logistics, legal, and compliance teams to release the shipment from customs.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Third Party Due Diligence Procedure
- Kering Conflicts of Interest Procedure
- Kering Gifts & Hospitality Procedure
- Kering Donations & Sponsorship Procedure

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Local/Brand/Group Compliance department



ENSURING FAIR COMPETITION

Kering believes in open and fair competition and is committed to conducting business in compliance with all competition laws applicable to its activities. Kering prohibits all forms of anti-competitive practices and expects all employees to act accordingly. Violations of competition laws can have very serious consequences, including severe fines and reputational damage and, for the individuals involved, disciplinary actions and criminal prosecution.

Competition rules prohibit agreements between competing businesses to fix prices, share market or supply sources, limit production or technical development, and other coordinated practices that restrict competition. Dealings with non-competitors may also violate competition rules. For instance, controlling or attempting to control a distributor's resale prices is prohibited in many jurisdictions. Competition rules also prohibit market abuses by businesses holding a dominant position. Ultimately, competition laws aim to protect consumers through lower prices and better-quality products and services.

DO

- Comply with all competition rules applicable to our activities;
- Be familiar with Kering's competition law policies and associated guidelines and adhere to them in our interactions with third parties;
- Immediately put an end to interactions and practices that may violate competition rules and report any such instance to your legal department and Kering Compliance;
- Seek guidance from your legal department and Kering Compliance in case of doubts or questions.

DON'T

- Agree with competitors to fix prices, share market or supply sources, limit production or technical developments, or engage in other coordinated practices that may limit competition;
- Exchange commercially sensitive information with competitors in breach of competition laws;
- Control or attempt to control a distributor's own trading conditions beyond what is allowed by applicable competition rules.

FAQS

As part of a benchmarking exercise, I would like to participate in regular meetings with my counterparts at competing groups. We will not enter into any binding agreement. Is this possible?

Competition law captures any kind of agreement from a binding written agreement to much looser and less formal arrangements, such as oral agreements, chains of emails, a phone conversation, etc., and even simple information exchanges with competitors may violate competition rules. For this reason, you should not engage in informal group discussions or collective decision-making with competitors. Internal guidelines regarding interactions with competitors in various legitimate settings, such as trade associations or certain environmental collaborations, must be observed at all times. If you have any questions, you should contact your legal department or Kering Compliance.

What type of information should I not be sharing with competitors?

Even simple information exchanges with competitors may violate competition rules when the information exchanged is commercially sensitive, including, for instance, confidential and strategic information on pricing, product development, marketing, costs, research and development projects, and any other subject that is commercially relevant. If the exchange of confidential information is necessary to implement a legitimate collaboration or transaction involving competitors, your legal department and Kering Compliance should always be consulted prior to sharing this information.

I am negotiating an agreement with a third-party retailer for the distribution of my House's products. Since we do not compete with this retailer, is it safe to assume the agreement will not be subject to competition rules?

No. Although interactions with competitors require heightened vigilance, dealings and interactions with other third parties, such as distributors and vendors, are also subject to competition rules. In this respect, remember that in many jurisdictions, controlling or attempting to control a distributor's resale prices, through contract provisions or other means, is prohibited under competition rules.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Competition Law – Policies for Europe, Americas and APAC Regions
- Competition Law Manual

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Kering Compliance department
- Legal contact for your House/department



COMPLYING WITH EXPORT CONTROLS AND INTERNATIONAL SANCTIONS

Kering is committed to full compliance with all applicable sanctions and export control regulations. Accordingly, Kering has established a dedicated procedure (the “Sanctions Procedure”) that sets out the responsibilities and rules to which all employees and those acting on behalf of Kering Group must adhere. This procedure is updated on a regular basis.

- **Sanctioned Country** means any country or territory that is subject to heightened restrictions relating to exports, imports, finance, investments or other activities under the Sanctions Regulations. Please refer to the Sanctions Procedure for an updated list of Sanctioned Countries.
- **Sanctioned Party** is an individual, entity, or organization that is subject to economic, trade, or legal restrictions imposed by a government or international body due to violations of laws, regulations, or policies.
- **Sanctions Regulations** means any restrictive measures relating to trade sanctions, foreign trade controls, export and re-export controls, non-proliferation, anti-terrorism and similar laws enacted, adopted, administered, imposed or enforced by a government or international body.

DO

- Know the rules, read the Kering Sanctions Procedure, and understand and comply with export control laws and sanctions applicable to our business activities;
- Screen third parties, including business partners and customers as required, and suppliers against sanctions and embargo lists before engaging in a business relationship;
- Be vigilant for warning signs of potential violations and report any sanctions-related red flags to the Group Compliance team;
- Ask for guidance from the Group Compliance Team if unsure or in doubt.

DON'T

- Engage with a third party before conducting required due diligence;
- Engage in prohibited transactions involving sanctioned parties or sanctioned countries;
- Ignore red flags. If something seems suspicious, do not proceed without investigating and reporting it to the Group Compliance team.

FAQS

How do I know if a company is subject to sanctions?

Before engaging in any transactions with third parties, you should ensure due diligence is conducted, as it includes a screening against sanctions and embargo lists.

What should I do if I suspect a transaction may violate export controls or sanctions?

If you notice a sanctions-related red flag, put the transaction or relationship on hold and report your concerns to the Group Compliance team. Group Compliance will investigate the matter further to determine how to address any potential risks.

What are the consequences of violating export control or sanctions laws?

Violating export control or sanctions laws can result in heavy fines, criminal charges and damage to the Group's reputation. Individuals could also face personal liability, including imprisonment.

What should I do if a customer or business partner asks me to find a way around sanctions or export controls?

You should never attempt to bypass or circumvent legal restrictions. If a customer or a business partner suggests you do so, you should refuse and report the request to Group Compliance.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Sanctions Procedure
- Kering Third Party Due Diligence Procedure

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Local/Brand/Group Compliance department
- Kering Security department



ENGAGING RESPONSIBLY WITH THE FINANCIAL MARKETS

Kering, through its Financial Communications Department, is committed to providing accurate, precise, and reliable financial information to all stakeholders. The Group ensures equal access to financial information in full compliance with regulatory requirements, fostering transparency and trust both within the company and with the financial markets. To maintain an open and constructive dialogue, Kering regularly engages with institutional investors, financial analysts, and individual shareholders through various channels, including meetings, roadshows, conferences, and dedicated publications. All public information is available in the Finance section of kering.com.

- **Financial community** is a broad term referring to investors, financial analysts, financial institutions, and other market participants who follow, assess, and invest in Kering's stock.
- **AMF (Autorité des marchés financiers)** is the French financial market regulator responsible for ensuring that investors are provided with adequate information and for supervising the orderly operation of markets.
- **Inside information** means any precise, non-public information concerning directly or indirectly an issuer that, if made public, could significantly impact the company's stock price or related financial instruments. The use or disclosure of inside information is strictly regulated to prevent insider dealings.

DO

- Forward all investor or financial analyst inquiries to the Financial Communications Department;
- Answer questions from the Financial Communications Department about my area of expertise to support their dialogue with the financial community.

DON'T

- Publicly discuss financial topics or engage with the financial community without being an official spokesperson;
- Disclose inside information, even if non-financial.

FAQS

An investor/a financial analyst reaches out to request information about Kering. How should I respond?

Immediately inform the Financial Communications Department, which is responsible for investor and financial analyst relations and the official disclosure of financial information.

I am invited to speak as an expert on my topics by a financial company or in front of a financial audience. Can I accept?

If the "expert conference/call" is paid, you must decline. If it is unpaid, you must submit the proposal to the Financial Communications Department, which will review it to determine the appropriate response.

A supplier asks me about Kering's expected sales evolution for the next quarter. Can I share any forecasts?

No. Only public information, available on Kering.com, can be shared.

I have information about upcoming financial results. Can I share it with a colleague or a friend?

No. If you have become aware of this information and should not have, please notify the Corporate Governance & Securities Law Department.

A journalist asks me about my House's current financial performance. Can I answer?

No. Only authorized spokespersons from the Financial Communications and Press Relations teams are allowed to provide official statements. You must redirect the journalist to the Press Relations Department.

I have inside information about a company different from Kering. Can I use it?

No. Using inside information for personal gain or the gain of others may be subject to penalties in many countries, even if the information does not relate to Kering but to a third-party company.

WHO TO CONTACT IN CASE OF QUESTION OR SUSPICIONS OF MISCONDUCT:

- Kering Financial Communications department
- Kering Press Relations department (if related to a journalist)
- Kering Corporate Governance & Securities Law department



PREVENTING MONEY LAUNDERING AND TAX EVASION

Kering is committed to combating and seeking to prevent money laundering and the funding of terrorist or criminal activities by complying with all applicable laws and regulations related to anti-money laundering in each of the jurisdictions in which it conducts business. The Group also prioritizes employee training and awareness on local anti-money laundering procedures, coupled with continuous transaction monitoring and prompt reporting of any suspicious activity. Kering is a responsible organization, complying with all financial laws and regulations in the jurisdictions in which it operates. Kering does not tolerate any form of tax evasion or artificial tax arrangements. In addition, the Group places significant emphasis on systematically applying the “arm’s length” principle to ensure its taxable income aligns with economic substance. Kering strives to foster transparent and collaborative relationships with all tax authorities in the world.

- **Money laundering** is the process of creating the appearance that money obtained through criminal activity, such as drug trafficking or terrorist activity, was obtained from a legitimate source.
- **Suspicious transactions** are any transactions that raise reasonable grounds to suspect they may be linked to criminal activity, such as money laundering, corruption, terrorism financing or fraud.

DO

- Familiarize yourself with anti-money laundering procedures applicable to your market;
- Be vigilant for red flags, such as any unusual or suspicious transaction patterns, frequent purchases of identical items or large cash payments;
- Ensure compliance with any thresholds on cash payments applicable in the relevant jurisdiction;
- Retain all relevant documents for the retention period applicable in the relevant jurisdictions;
- Report to Compliance any suspicious transaction before it occurs. When that is not possible, report the transaction to Compliance after it is completed. Before signing an agreement, report to the Tax Department in case a potential subcontractor is located in a tax haven jurisdiction.

DON'T

- Ignore suspicious transactions;
- In case of doubt, do not proceed. Instead, ask for assistance from your manager or Group/Brand Compliance;
- Accept cash for transactions over the prescribed limit without reporting the transaction, if applicable under local law.

FAQS

Whom should I contact if I notice a suspicious transaction?

Report it immediately to your Local/Brand Compliance Officer or the Group Compliance team.

What should I do if a high-risk client refuses to provide identification?

Do not proceed with the transaction if a client refuses to provide identification when required per Client Due Diligence requirements. Escalate it to Compliance, and document the refusal in accordance with the Anti-Money Laundering policy.

How can I identify a red flag for potential money laundering?

Look for signs like high-value cash transactions, third party purchases with no clear connection between the purchaser and end user, rapid reselling, unusual payment methods, or customers unwilling to provide identifying documents or source of funds.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Global Policy on Anti-Money Laundering
- Kering Group Tax Policy

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Local/Brand/Group Compliance department
- Kering Tax department



IDENTIFYING AND PREVENTING CONFLICTS OF INTEREST

Kering acknowledges and respects the personal interests and privacy of its employees. Although everyone has a wide variety of interests to manage (professional, personal, political, associative, etc.), not all interests generate conflicts. When they do, however, it is important to identify and prevent conflicts of interest. For example:

- A conflict of interest can impact the employee's duty to defend the Group's interests and could affect their independent judgement.
- The simple appearance of a conflict of interest (even if it is not proven) may negatively impact the perception of our professional integrity and be harmful to the Group's reputation.
- Fraud and breaches of anti-bribery laws can start with a non-disclosed conflict of interest.

Preventing the risks associated with a conflict of interest involves disclosing such a conflict in order to establish an action plan with the employee's manager.

Conflicts of interest refers to a conflict between professional obligations on one hand, and familial, political or financial interests on the other hand. A conflict of interest can be an actual conflict, a perceived conflict or a potential conflict.

DO

- Disclose any conflicts of interest to your manager or immediate supervisor;
- Seek guidance if you are uncertain whether a situation constitutes a conflict of interest;
- Recuse yourself when necessary.

DON'T

- Conceal information about a potential conflict of interest;
- Put yourself in a situation where your personal interests could influence your professional decisions within the Group.

FAQS

My cousin has applied for a job in my department. Can I be involved in the hiring process?

No. To avoid any conflicts of interest, you should disclose the relationship and remove yourself from the hiring decisions related to your cousin. The recruitment process should be fair and impartial.

I am considering investing in a company that does business with our Group. Is this a conflict of interest?

It could be. If your investment could influence your decisions in a way that conflicts with Kering's interests or compromises your objectivity in performing your role within the Kering Group, this may create a conflict of interest. You must disclose this investment to your manager.

My friend owns a company which could be a good vendor for the Group. Can I recommend them?

Yes, but you should disclose your relationship before making the recommendation. You also should not be involved in the selection process. Standard procurement process should be followed to ensure a fair and transparent decision.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Conflicts of Interest Procedure

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Your manager
- Human Resources Manager
- Local/Brand/Group Compliance department



ENSURING DATA SECURITY

Kering considers information one of its most valuable assets and recognizes the paramount importance of protecting that information. Confidentiality, integrity, and availability of data are central to the Group's strategy, as they are essential for customer trust, competitive advantage, and compliance with regulations.

- **Security incident** is an event potentially affecting the confidentiality, integrity or availability of the Information System.
- **CISO** stands for Chief Information Security Officer
- **Logical access** is the ability to interact with IT systems and data through authentication (like usernames and passwords).
- **Least privilege principle** means users have only the authorizations needed to carry out their mission.
- **Phishing** is the fraudulent practice of sending emails to usurp the identity of reputable companies in order to induce individuals to reveal sensitive information.

DO

- Secure our infrastructure by keeping components updated and monitored, and by following best practices;
- Manage security incidents and implement a business continuity plan;
- Integrate security into contracts and projects from the design phase;
- Control logical access by identifying users, ensure protection of authenticators, and follow the least privilege principle;
- Implement a cross-functional approach under the supervision of the Group CISO to manage security risks across all functions and regions.
- Always adhere to policies based on applicable laws and regulations.

DON'T

- Use information for unauthorized purposes. It should only be used for legitimate, specified objectives;
- Collect data in an illegal or opaque manner;
- Overlook security requirements;
- Ignore security incidents. Report them immediately in accordance with the incident management policy;
- Use unsanctioned online solutions that expose sensitive Kering data.

FAQS

What should I do if I receive an email that seems legitimate but asks me to click a link or provide personal information?

Be cautious, it could be a phishing attempt designed to steal your data. Do not click any links or share any personal information. Report the email immediately using the ReportPhish button or by sending it to security@kering.com then delete the email. The same applies to suspicious messages on instant messaging apps or phone calls.

What should I do when starting a new website project?

It's crucial to follow the Project Gate Committee process to involve IT Security, architecture, and Privacy teams. They will provide guidance on best practices, define security and privacy requirements, and help ensure proper safeguards are in place throughout the project.

I received an alert that my work account may be compromised. What should I do?

Always create passwords that comply with the Kering Password policy, and use a password manager like Keepass to secure management. Enable multi-factor authentication for added security and change your password if there is any suspicion of compromise. You can update your password in your user account settings.

I want to install an application on my workstation. What should I do?

Please consult the Kering application catalog for available tools to ensure compliance with usage rights. For any additional professional needs, submit an IT Ticket via Kering Connect after manager validation. All requests are subject to security approval to ensure compliance and data protection.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Global Information Security Policy (GISP)
- Operational Policies linked to GISP
- Best Practice Guidelines: Available on the cybersecurity portal

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Kering Cybersecurity and Incident Management team: security@kering.com
- Group Chief Information Security Officer (CISO)/Brand IT department



ENSURING DATA PRIVACY

The privacy of our customers, employees, and third parties is of the utmost importance. Personal information should be collected in a transparent manner, used carefully and stored securely. To do this, we follow key principles that guide our data handling journey. Every employee within Kering has a role in upholding these principles and following relevant privacy laws and regulations. To respect individuals' privacy and rights, we ensure that personal data is:

- collected and used fairly and legally;
- used strictly for the reason it was collected;
- accurate and kept up-to-date;
- retained only as long as necessary for its intended purpose;
- accessible when needed and protected against unauthorized access or loss.

DO

- Be transparent and inform individuals about the personal data we collect, use, and share;
- Verify if the customer can be legally contacted before sending commercial communications;
- Consider the potential impacts of using new technologies;
- Ensure third parties handling our data comply with our privacy standards;
- Adopt a “privacy by design” approach for our initiatives.

DON'T

- Make impactful decisions based solely on automated processing;
- Discuss a client's personal information, such as purchase history or habits, with anyone other than the client, including family members or other third parties;
- Collect sensitive information, unless required by law or allowed by a Privacy Officer;
- Use personal data without regular privacy audits and assessments.

FAQS

Can I consult the clients' social media profiles to understand their preferences and serve them better?

No. The relationship with the customers must rely solely on the information they voluntarily share during meetings, conversations, or through official and authorized channels. Referring to or using data, comments, or information found on social media or other platforms, even if seemingly relevant, is strictly prohibited.

Can I use all types of personal information for my project?

No, some personal Information is considered more sensitive than others. Sensitive personal information refers to data that includes, but is not limited to, biometric details (such as retina or iris scans, fingerprints, voiceprints, or facial/hand geometry), health and genetic information, ethnicity, political views, religious or philosophical beliefs, union membership, and personal details related to sexual orientation. We typically process such sensitive personal information only in specific situations, such as when required by law.

Can I access personal data if it is not related to a current project on which I am working?

No, you should only access personal data that is necessary for your specific role or project. Accessing data without a legitimate need violates data protection principles and could result in disciplinary action. Always ensure that data access is limited to authorized personnel only.

Is a privacy assessment required when using free tools or resources?

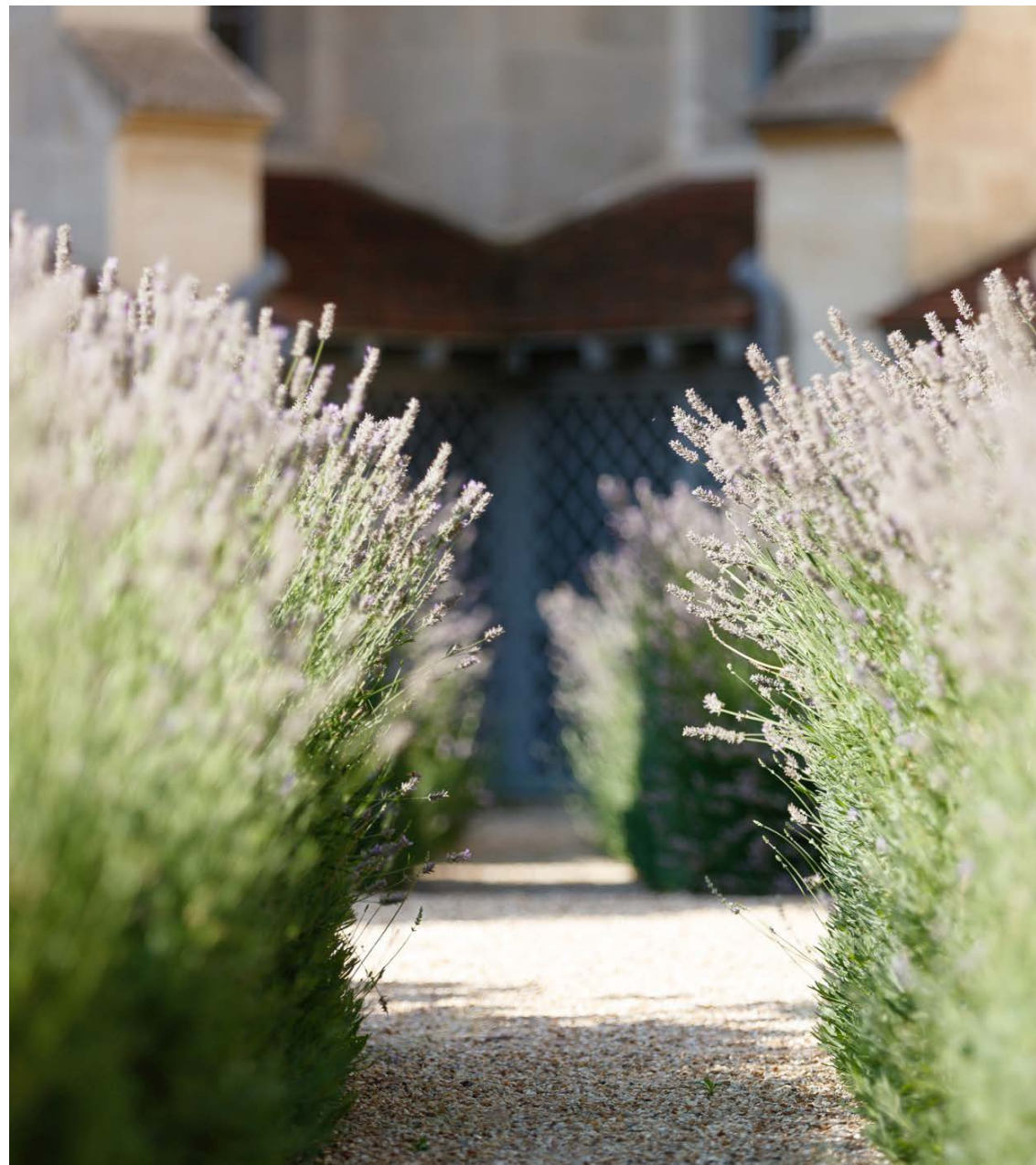
Yes, a privacy assessment allows the identification of potential risks related to the collection, storage, sharing, and security of personal data. It should be done for any new tool or initiative that processes personal data, whether paid or free. As an organization committed to upholding the highest standards of privacy, Kering adheres to the principle of Privacy by Design. This principle mandates that privacy considerations be integrated into the design of systems and processes from the very beginning. Therefore, any tool, regardless of its cost, must undergo a privacy assessment to ensure it complies with relevant data protection regulations. By prioritizing this assessment, we reaffirm our commitment to transparency, accountability, and the security of personal data, while respecting individuals' privacy rights.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Privacy Governance Policy
- Kering Data Subject Request and Complaint Policies (Controller and Processor)
- Kering Privacy Accountability Policy
- Kering Privacy Breach Management Policy
- Kering Training and Awareness Policy
- Kering Privacy Audit Policy
- Kering Privacy by Design and by Default Policy
- Kering Data Access & Management Policy

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Kering Privacy Officers
- Brand Privacy Coordinators



MONITORING GIFTS AND HOSPITALITY

Kering is committed in upholding the highest standards of compliance, particularly concerning the exchange of gifts and hospitality. The exchange of gifts and hospitality are a relatively common business practice to foster and maintain good relationships. However, under some circumstances there is a risk that the exchange of gifts and hospitality could be used as a bribe. Gifts and hospitality should not be promised, offered, given, requested or accepted for the purpose of obtaining an undue advantage or improper influence. Rather, gifts and hospitality should be exchanged in good faith and transparently, with a legitimate business purpose, appropriate given the circumstances, and compliant with applicable laws.

- **Gift** means anything of value for which the recipient is not required to pay the retail, usual or customary cost. This includes, but is not limited to goods, gift certificates, discounts, services and any other benefit or advantage (e.g. employment offer).
- **Hospitality** means any entertainment or recreation for which the recipient is not required to pay. This includes, but is not limited to, meals or tickets to cultural events and sporting events.

DO

- Become familiar with the Kering Gift & Hospitality Procedure;
- Align the gift or hospitality with applicable Kering procedures and any applicable procedures of the third party;
- Ensure gifts/hospitality have a clear, legitimate business purpose and are reasonable and proportionate;
- Offer and receive gifts and hospitality transparently, and ensure they are properly recorded;
- Avoid gifts and hospitality to or from a public official unless fully vetted and approved.

DON'T

- Offer or accept gifts or hospitality that could be perceived as a bribe;
- Offer or accept gifts or hospitality in the attempt to gain an undue advantage or improperly influence decision-making;
- Exchange gifts or hospitality at a critical moment of a decision process such as during contract negotiations, bidding processes, or regulatory approvals;
- Exchange cash or cash equivalents as gifts;
- Exchange solicited gifts or hospitality.

FAQS

What should I do if I receive a gift or plan to offer a gift or hospitality?

Analyze the type of gift or hospitality according to the criteria in the Gifts and Hospitality Procedure. Check the value of the gift or hospitality. Determine if you need approval from your line manager or compliance officer as per the applicable House's procedure and, finally, obtain the proper approvals and keep a record of the gift, if necessary.

A supplier offers me an expensive piece of jewelry as a personal gift. Can I accept it?

Accepting high-value personal gifts from a third party is not permitted under our procedure. Kindly express your gratitude and politely decline, explaining that Kering policies prevent you from accepting such gifts.

What should I do if a supplier participating in a bidding process offers me a luxury gift or an exclusive invitation?

Offering gifts or hospitality during a bidding process or negotiation period might be seen as an attempt to influence your decision unfairly. You should decline the offer and report it to your Compliance Officer.

What should I do if I am uncertain about the appropriateness of a gift or hospitality?

If in doubt, consult with your Compliance Officer before accepting or offering any gift or hospitality.

Can I invite a public official to a fashion show or offer VIP hospitality to a public official?

Gifts and hospitality offered to public officials are highly sensitive and must be carefully addressed. If the invitation serves a clear, legitimate business purpose, is reasonable, compliant with applicable laws and regulations, and approved in advance by compliance, it may be allowed. However, each situation will be determined case by case having in mind all the factors above.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Gifts & Hospitality Procedure

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Local /Brand/ Group Compliance department



MONITORING DONATIONS AND SPONSORSHIPS

Kering is committed to making a positive contribution in the communities where we do business, including by providing sponsorships and making donations. As we do so, Kering follows the legal and ethical practices in each country where we operate. This includes only making charitable donations to organizations that serve a legitimate public purpose and that are subject to high standards of transparency and accountability. Kering requires that contributions align with our values, are approved in advance, and are properly documented. Kering policy prohibits donations or sponsorships to gain an undue advantage or improperly influence the conduct of the recipient. Kering also does not make contributions to political parties.

- **Donation** means giving anything of value, including the provision of personal services, “in kind” support, merchandise or volunteer hours, to a charitable or nonprofit organization without charge, on behalf of Kering Group.
- **Sponsorship** means supporting people, organizations or events by giving money, goods or services, usually with the purpose of promoting the Kering Group or a Kering House, i.e., in return for brand presence at an event or organization and/or in some form of broadcast or non-broadcast media.

DO

- Become familiar with Kering Donations and Sponsorships Procedure;
- Ensure the donation or sponsorship aligns with Kering’s values and/or the causes supported by the Group;
- Maintain transparency and proper documentation;
- Ensure there are no conflicts of interest;
- Verify that the donation or sponsorship is not being used as a hidden payment;
- Avoid donations to charities affiliated with public officials unless approved by your Compliance Officer.

DON'T

- Provide donations or sponsorships that have been requested as part of a business transaction;
- Make donations to political parties;
- Make donations or sponsorships for the benefit of third parties affiliated with public officials unless approved by a Compliance Officer;
- Provide donations or sponsorships if it violates the policies of the recipient organization.

FAQS

A public official responsible for granting a permit for one of our new stores has suggested that we make a donation to his wife’s charity to “speed up the process”. What should you do?

This is a case of bribery disguised as a charitable donation. You should refuse the request, document the interaction, and immediately report it to your Compliance Officer. Donations should not be used to improperly influence business decisions or to gain an undue advantage.

A existing brand ambassador has requested a sponsorship for their private foundation. Can we accept?

This situation could create a conflict of interest for the brand ambassador, depending on how the private foundation works. Due diligence should be conducted on the private foundation, and the sponsorship should be approved in advance by your Compliance Officer, as well as by the relevant management in accordance with the Group procedures. Group Compliance can assist with any questions about the Third-Party Due Diligence Procedure or the Conflicts of Interest Procedure.

A client at one of our stores is considering purchasing an expensive handbag. She says she will purchase the handbag if the House makes a donation to a nonprofit organization she started. Should the House make the donation?

While Kering supports philanthropic donations, the quid pro quo described in this situation is inappropriate. The client here is essentially asking for a bribe, even though it would be paid indirectly to her nonprofit organization.

In this situation, the client advisor should contact the store director or assistant store director on duty. They can explain to the client that the House would be happy to collaborate on a different, independent nonprofit project in the future and in accordance with Group procedures, but that the House’s nonprofit contributions are not tied to purchases.

You request a donation for an NGO you personally support. Can Kering make a donation?

The donations Kering makes are assessed based on independent criteria, including whether the nonprofit organization aligns with the Group’s values. If you have a personal or financial link to the NGO, the donation could present a conflict of interest. Each situation should be assessed based on a case-by-case basis.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Donations & Sponsorships Procedure
- Kering Third Party Due Diligence Procedure

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Local/Brand/Group Compliance Officer
- Ethics & Compliance Committee
- Finance department





KERING AS A RESPONSIBLE ENTERPRISE

RESPECTING HUMAN RIGHTS

Kering commits to upholding and respecting the human rights of all people involved in its value chain, including the affected communities. Kering strives to detect, prevent and mitigate any negative impacts that its operations may create or to which it may contribute, and to develop a positive impact where possible. Kering follows internationally recognized human rights standards, including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, core international labor organization conventions and modern slavery regulations. Kering has a zero-tolerance approach to child labor, human trafficking, forced labor and any form of slavery. In addition, Kering considers the French Duty of Care Law to form part of its ethical commitments and has a dedicated program to implement such.

Human rights are rights inherent to all human beings, without discrimination. They are not granted by any state, and they include, notably, the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, as well as other fundamental rights.

DO

- Promote the respect of human rights by our suppliers and sub-suppliers;
- Promote safe, healthy and decent working conditions, including for instance reasonable working hours, a living wage, clean facilities, individual well-being, etc.;
- Use raw materials aligned with Kering standards;
- Protect local communities, in particular their cultural heritage, land rights, social development and environment (including the right to water and to a clean, healthy and safe environment);
- Pay special attention to vulnerable populations particularly exposed to human rights risks (such as people with disabilities, migrants, illiterate workers, women and the LGBTQIA+ community);
- Proceed with internal and third-party human rights and duty of care due diligence, and with social audits of suppliers, sub-suppliers and newly acquired entities;
- Encourage stakeholders to raise any human rights and duty of care-related concerns or issues through the Kering Whistleblowing Platform.

DON'T

- Tolerate any form of forced or compulsory labor, human trafficking, debt bondage, any retention of workers' ID or wages, any recruitment fees or any restrictions to freedom of movement, across our operations or in our supply chain;
- Select partners, contractors or suppliers that are not compliant with social and environmental regulations, and Kering's standards and values;
- Maintain a business relationship with suppliers or persons violating human rights regulations, in particular unlawful practices of child, forced or compulsory labor;
- Violate models' rights and well-being as stated within the Kering Charter on the Working Relations with Fashion Models and their well-being.

FAQS

How does Kering ensure compliance and commitments to human rights across its operations and supply chain?

Kering does this by elaborating and implementing clear policies to address potential human rights and duty of care violations in our operations and value chain, requiring adherence to the Kering Suppliers and Business Partners' Charter and by offering training on human rights. We also implement monitoring tools such as site visits, audits, due diligence, third party assessments and risk mappings of our own operations and our suppliers and subcontractors' activities, and we engage with external stakeholders to improve industry-wide practices.

What is the "duty of care" in the context of human rights?

It refers to Kering's legal obligation to identify, prevent, and mitigate any adverse human rights and environment impacts resulting from our operations. It includes performing a risk mapping of our own internal operations, those of our subsidiaries and, where related to our chains of activities, those of our direct business partners, and carrying out an in-depth assessment where adverse impacts have been identified to be most likely to occur and most severe.

What role do I play in Kering's human rights efforts?

You can play a key role by adhering to Kering's ethical and human rights standards and policies, reporting concerns related to human rights issues (notably through the Whistleblowing Platform), and participating in trainings to know your rights and respect human rights in your daily work.

How does Kering engage with affected communities or individuals?

We seek to engage with affected communities (local communities and indigenous peoples) through dialogue, restorative strategies, and by supporting initiatives that enhance local community rights, particularly in regions vulnerable to exploitation or abuse.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Human Rights Policy
- Kering Suppliers and Business Partners' Charter
- Kering Sustainability Principles
- Kering Standards for a Sustainable Production
- Kering Charter on the Working Relations with Fashion Models and their well-being

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Brand/Group Compliance department



RESPECTING NATURE

At Kering, we firmly believe that respecting nature and the environment is essential for the resilience of our business and contributing to our vision of a creative and bold Luxury sector. Our commitment to sustainability is embedded in our strategy and reflected through concrete actions aimed at reducing our environmental footprint, preserving biodiversity, and promoting sustainable practices throughout our value chain. We adopt a holistic approach on climate, nature and circularity by integrating rigorous and innovative standards in our activities, setting ourselves ambitious science-based targets and upholding the highest standards in terms of animal welfare in our supply chains. We are dedicated to respecting the planetary boundaries and strive to avoid and reduce the depletion of natural resources, restore and regenerate ecosystems and transform our business model for a more sustainable future.

- **The planetary boundaries**, as defined by environmental science, represent the nine critical processes which, together, maintain a stable and resilient Earth, within which humanity can continue to develop and thrive for generations to come.
- **Science-based targets** are measurable, actionable, time-bound objectives, based on the best available science provided by external accredited third-parties.

DO

- Follow a precautionary principle, meaning acting carefully and conservatively to minimize potential adverse impact whenever there is a lack of scientific certainty regarding environmental challenges and issues relating to human health;
- Strive to embed environmental considerations in key decisions, and to de-couple our activities from natural resource consumption;
- Combat climate change by reducing our carbon footprint according to a trajectory aligned with the Paris Agreement and by adapting our activities to the impact of climate change;
- Measure the impact of our activities on the protection of natural capital and biodiversity, not only in the areas where we operate directly, but beyond in our value chain;
- Engage our suppliers and partners in our environmental excellence journey and decarbonization roadmap and collaborate with them to innovate and develop circular supply chains;
- Use raw materials and manufacturing processes aligned with Kering Standards;
- Implement and verify the highest standards of animal welfare across all our animal-based supply chains. We promote the ethical treatment of animals and refuse any animal testing.

DON'T

- Use hazardous chemicals not aligned with the Manufacturing Restricted Substances List (MRSL) and Product Restricted Substances List (PRSL) in the production of our products, processes and supply chain and pollute the environment or harm employees, workers and clients;
- Use misleading claims and lack of transparency when providing our stakeholders with information on our products, practices and progress;
- Select partners, contractors or suppliers that are not compliant with environmental regulations and Kering's standards.

FAQS

The creative office of one of Kering's Houses wants to use a new raw material for its upcoming collection (natural fiber, animal fiber, skin, synthetic fibers, etc.) How do we ensure that it respects Kering's standards?

The Kering Standards set out the criteria that we, and our suppliers, need to respect in terms of traceability (country of origin), use of chemicals, human rights, social and environmental impacts and animal welfare. Thus, we need to ensure that all raw materials used in our products respect these criteria and that certified, recycled, regenerative materials are preferred over conventional materials. For each new material not listed in the Kering Standards, contact the Sustainability Lead of your House for guidance.

I received several offers for the new technical equipment of the store we are renovating. The most energy efficient option is also the most expensive. What should I do?

Energy equipment that is more energy efficient can be more expensive at purchase but may help save money and greenhouse gas emissions during the lifetime of the store. You should calculate the total cost over the lifetime of the store, in collaboration with the construction, the facility management and operation teams. These figures will help you take the right decision, both in financial terms and greenhouse gas emissions.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Environmental Policy
- Kering Climate Strategy
- Kering Biodiversity Strategy
- Kering Water Strategy
- Kering Circularity Ambition
- Kering Standards for a Sustainable Production
- Kering Animal Welfare Standards
- Kering Sustainability Principles
- Kering Suppliers and Business Partners' Charter
- Product Restricted Substances List (PRSL)
- Manufacturing Restricted Substances List (MRSL)

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Kering Sustainability department or your Brand Sustainability Lead
- Kering Compliance department



STRIVING FOR A POSITIVE IMPACT

Kering is dedicated to creating a positive impact beyond its own operations. The Group aims to create a responsible and transparent supply chain as well as support a just transition to sustainable practices. Kering also strives to have a positive impact on employees and supply chain workers.

Kering collaborates with its business partners to drive positive environmental and social impacts aligned with its Sustainability Strategy. The Group works towards reducing the environmental footprint of the luxury industry by (i) promoting sustainable practices, using an open source-approach and (ii) setting ambitious environmental targets while ensuring social benefits, including through collaboration with third-parties. Finally, Kering is dedicated to supporting women's empowerment and fostering an inclusive environment in broader society.

DO

- Put people at the heart of the environmental initiatives we support and deliver so that their voices can be heard.
- Support initiatives that preserve traditional savoir-faire and craftsmanship to protect cultural heritage, support local communities and preserve the quality and exclusivity of our products;
- Work towards upskilling our value chain workers to equip them for potential disruptions that could be incurred as we shift toward a green economy;
- Use our influence and expertise in collaborative initiatives to continue driving collective change and establish the luxury industry as best in class for environmental, social and human rights practices.

DON'T

- Make climate and nature decisions without considering a social lens;
- Work in silos. Instead, strive to work collaboratively with our business partners, whenever required, to ensure that our efforts can drive meaningful transformation across our industry.
- Join associations, coalitions and organizations with purposes, actions and positions, as a Kering employee, not aligned with our Sustainability Strategy, our Code of Ethics and other relevant Compliance policies and procedures.

FAQS

What is the concept of “just transition”?

The concept of just transition involves greening the economy in a way that is as fair and inclusive as possible for everyone concerned, creating decent work opportunities and leaving no one behind. Thus, when implementing new processes, on an industrial site for instance, we need to take into consideration the adaptation of our employees' and suppliers' skill sets through training, upskilling or reskilling options.

What is the difference between the minimum wage and the living wage?

The living wage corresponds to the remuneration received for a standard work week by a worker in a particular place that is sufficient to afford a decent standard of living for the worker and their family (including food, water, housing, education, health care, transportation, clothing and other essential needs, and provisions for unexpected events). It is different from the minimum wage, which refers to either the statutory national minimum wage or the negotiated wage in collective agreements.

I would like to join a new external coalition. How do I ensure that it is aligned with Kering's standards and values?

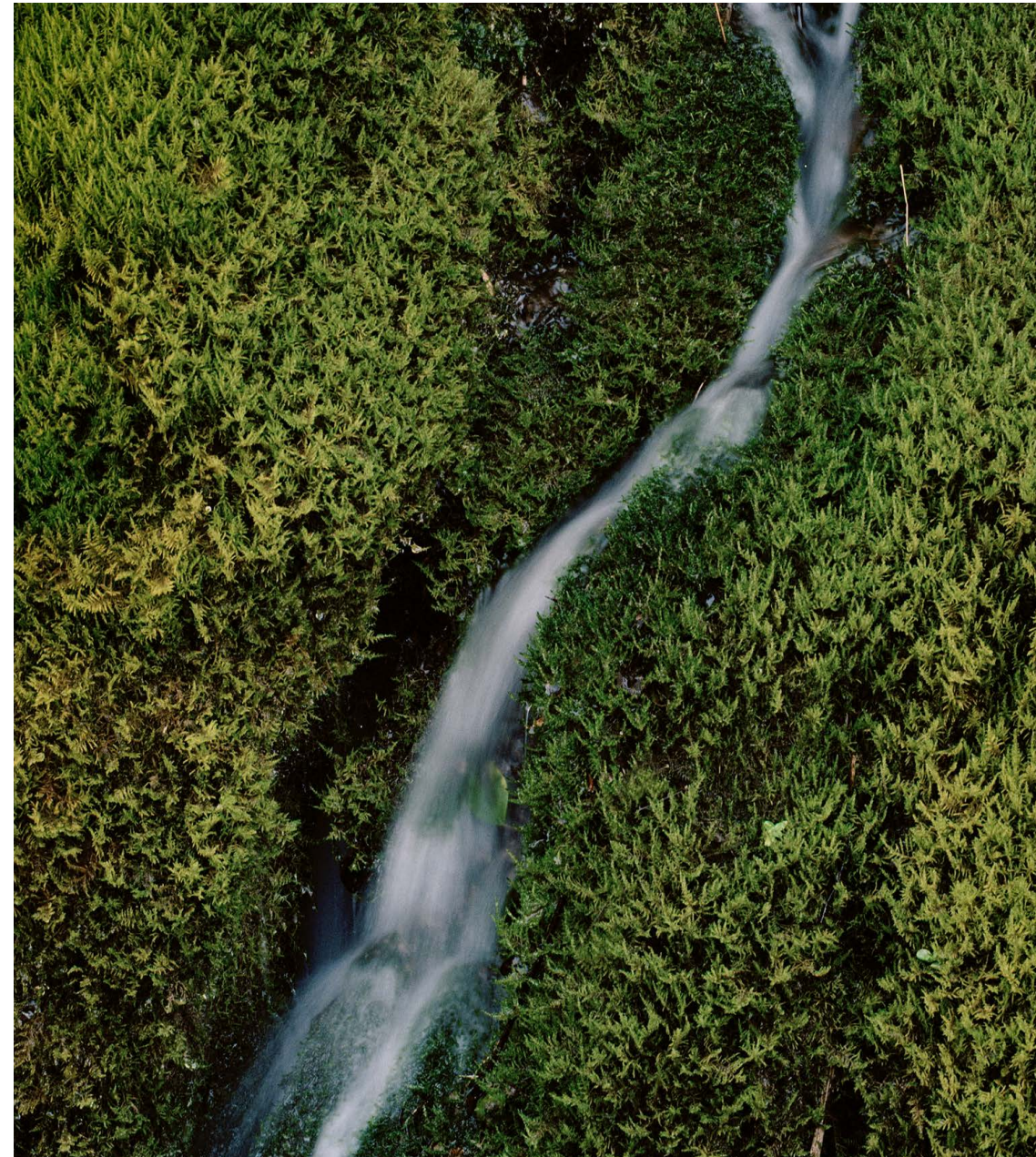
Kering is committed to moving the needle on environmental and social issues, recognizing that collaboration can be key to achieving significant results. By cooperating with other actors of our industry, we can achieve greater and more widespread outcomes in addressing these critical challenges. Kering ensures that it only belongs to associations, coalitions and organizations with purposes, actions and positions that align with the Paris Agreement, our Sustainability Strategy, our Code of Ethics and other Compliance procedures.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Climate Strategy
- Kering Biodiversity Strategy
- Kering Water Strategy
- Kering Standards for a Sustainable Production
- Kering Sustainability Principles
- Kering Human Rights Policy
- Kering Suppliers and Business Partners' Charter
- Competition Law Policies and Manual

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Brand Sustainability Lead
- Brand/Group Compliance department
- Kering Sustainability department



ADOPTING RESPONSIBLE COMMUNICATION AND ADVERTISING

We understand that effective, reliable, responsible, communication and marketing activities are vital for building trust with our stakeholders and fostering long-term relationships. For this reason, Kering strives to communicate in an ethical and transparent manner across all channels and ensure that images and messages delivered are carefully defined in line with company values. To ensure that communications comply with these principles at Group level and within each House, a Brand Trust function was created. We want to ensure that we communicate honestly, ethically and transparently about our products and services and business practices within our Group. Because we are conscious of the power of the images and messages produced by Kering and our Houses, we want them to reflect our commitment to human rights, inclusion and diversity, and gender equality, and be respectful of our planet.

Brand Trust is an internal function tasked with reviewing and making recommendations to the Houses regarding their content and marketing and communications activities, and to help them assess risks.

DO

- Provide clear, accurate and balanced information about the products and services offered;
- Recognize the importance of protecting vulnerable audiences from potential harm in our communication and marketing efforts;
- Comply with relevant laws and regulations aimed at protecting children's rights, including in advertising and marketing. Children must be depicted or staged only to promote children's products;
- Comply with relevant laws and regulations aimed at protecting consumers, including in advertising and marketing;
- Ensure that fashion models are always provided with proper working conditions and well-being standards in line with the Kering Charter on the Working Relations with Fashion Models and their well-being;
- Select media partners, media environments and ambassadors that are in line with Kering values;
- Ensure, through proper guidelines and measurement tools, that our advertising is displayed only in an environment that is compatible with Kering values and not detrimental to the Group's or Houses' images.

DON'T

- Be misleading or deceptive in our communications;
- Endorse any form of exaggerated claims about the social or environmental impacts of our work (as this might constitute greenwashing);
- Undermine company values in our advertising by lacking consideration for human rights, respect for diversity, and gender equality;
- Hire models aged under the age of 18 to represent adults at fashion shows and photo sessions;
- Endorse advertising campaigns featuring wild and domestic animals that are irresponsible and that harm the animals;
- Communicate in media environments that are not compatible with our values.

FAQS

Seeing an advertising campaign project in process, I have a doubt on how it depicts a certain minority through stereotypes. What should I do?

You should voice your doubt openly with the team in charge of the advertising campaign within the House's communication department and recommend that the Brand Trust function become involved in the validation of the campaign.

During a photo shoot for a visual asset, I suspect that one of the models does not feel at ease with the situation. Should I intervene?

Yes, you should. From the first selection interview to the last performance, the model must have the possibility to make a direct complaint in the case of a dispute with a modeling agency, a casting director or a Kering employee. The presence of at least one representative of the House during in-house castings is compulsory.

I would like to mention the environmental features of a product developed by my House. How can I make sure this is done in a manner that does not constitute greenwashing?

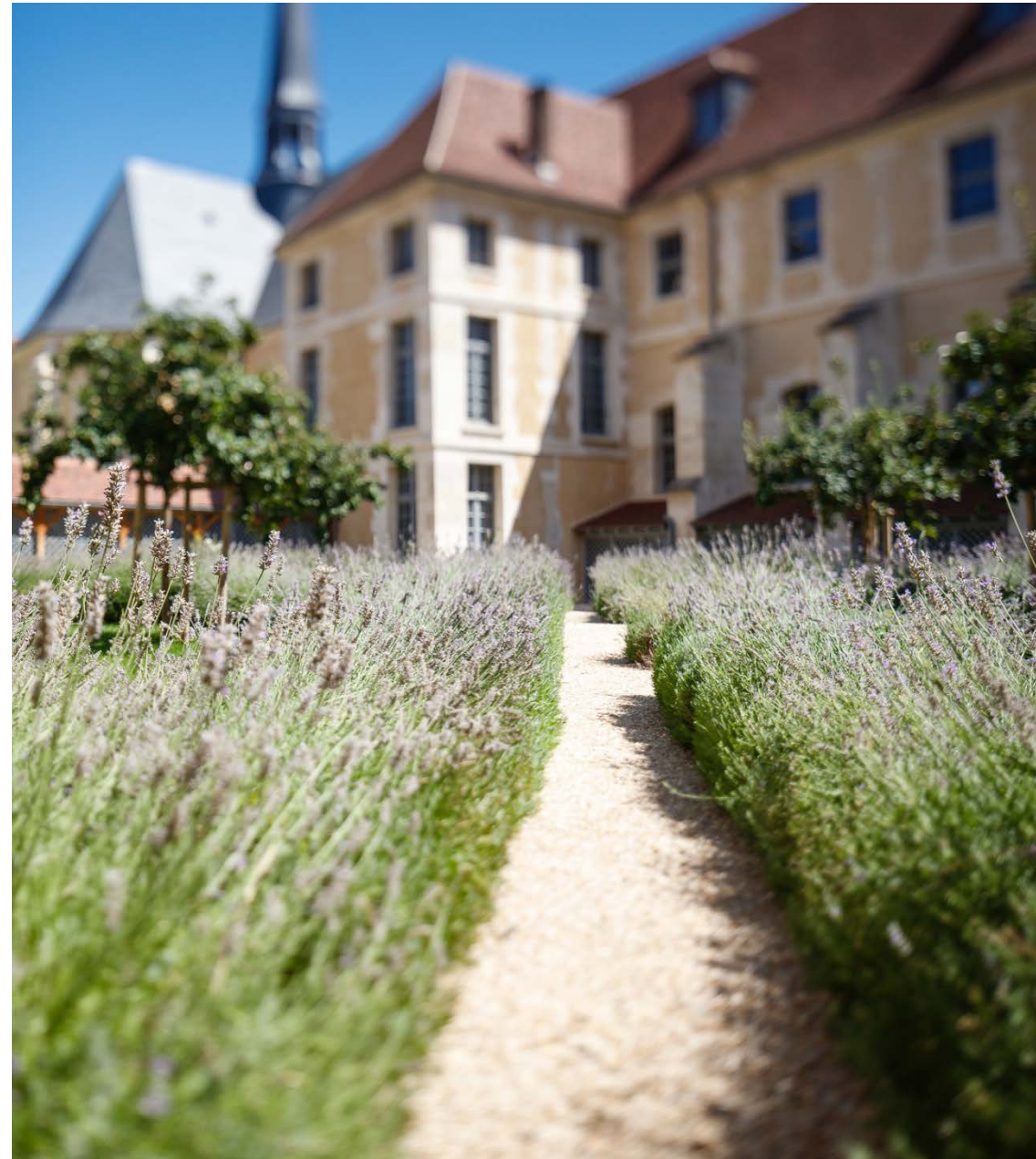
As mentioned in Kering's Guidance for sustainability claims, for a claim to be fully responsible and trustworthy it must be true and relevant, clear and unambiguous, fair and without exaggeration, substantiated and verifiable, not over-using visuals with natural or nature-like elements, and putting forward certifications properly. Reach out to your Sustainability Lead for direction.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Charter on the Working Relations with Fashion Models and their well-being
- Kering Standards for a Sustainable Production
- Kering Brand Trust Policy

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Brand Communication Director
- Kering Brand Trust
- Kering Sustainability department at Group level or Brand Sustainability Lead
- Brand Head of Media Buying



PROMOTING MINDFUL INNOVATION

At Kering, we believe that innovation in Luxury goes hand in hand with responsibility. We are committed to fostering mindful innovation, which involves creating new ideas, services, and products with a thoughtful approach that honors both our heritage and the future. We focus on:

- **Sustainability:** Using materials and processes that are as kind to the planet as they are to our craftsmanship;
- **Ethical Practices:** Ensuring that our initiatives respect both people and the environment;
- **Alternative Materials & Circular Economy:** Embracing innovative materials and circular business models to reduce waste and promote longevity;
- **Responsible R&D:** Conducting research that balances innovation with environmental and social responsibility;
- **Collaboration with Startups:** Partnering with forward-thinking startups to drive innovation in the luxury space.

Through mindful innovation, we aim to shape a future where Luxury is not only about excellence, but also about making a positive impact.

DO

- Foster a creative environment where new ideas are developed with responsibility and long-term impact in mind;
- Ensure that innovation considers accountability, data ethics, health, safety, individuals and the environment;
- Evaluate external expertise, and always prioritize innovations with lower negative environmental impact;
- Protect our innovations by securing the appropriate legal rights;
- Adopt the precautionary principle and take preventative actions when facing potential risks to health, safety, the environment, or individuals;
- Ensure that any artificial intelligence (AI) systems we develop or use are designed with fairness, transparency, and accountability.

DON'T

- Overlook the long-term implications of our innovations, whether social, environmental, or economic, compromising our legacy and responsibility as a luxury group;
- Block, through our own patents and intellectual property, the dissemination of solutions that can help the whole sector reduce its negative environmental impact (thanks to new lower impact materials for instance, or new dyeing technics);
- Accept unethical practices from suppliers or partners. Only work with those who align with our standards of responsibility, transparency, and sustainability.

FAQS

I am looking for innovative materials at a textile fair. What questions should I ask innovators to make sure they follow Kering guidelines for sustainable and innovative materials?

You should ask questions about several aspects concerning business and sustainability, including:

- **Freedom for the innovator to operate:** Do they own or exploit patents?
- **Traceability:** Where is the material produced? Using which technologies?
- **Chemical management:** Is it aligned with Kering Restricted Substances lists?
- **Environmental impact:** Is there a Life Cycle Analysis available?
- **Certifications and awards:** Has the innovation been certified or awarded any prize?

More details can be found in Kering Standards, Guidance for Innovation.

I would like to boost my team's efficiency and I've found a free online AI tool. Can I use it?

Using AI tools, including open-source or freely available online solutions without official approval could lead to security, intellectual property and compliance risks. If you plan on using company-specific data, you must use AI tools that have been approved by the Group. All AI usage should be documented in a centralized inventory. If you need an additional tool or have a suggestion, please contact your AI Champion and/or your IT stakeholder.

I am using AI to analyze market trends. How can we ensure the reliability of AI-generated analyses and research?

Always cross-check AI findings with trusted sources and human expertise. Regularly validate the data, especially when making decisions related to product development or market strategy. Ethical innovation means we must prioritize accuracy and protect the integrity of our research.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Responsible AI Policy
- AI Security Policy
- Kering Standards – Guidance for Innovation
- Kering and its Houses AI Policy

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Innovation Officer of your House
- Kering Innovation department
- Kering AI Center of Excellence
- Kering Data Privacy department
- Kering Legal department
- Kering Sustainability Program & Innovation team
- Kering Material Innovation Lab



ENDORSING RESPONSIBLE LOBBYING

As a global company, Kering participates in various dialogues with stakeholders from the public sphere, including but not limited to, political representatives. Our Group's lobbying activities are primarily aimed at promoting more sustainable growth in the luxury sector and beyond. The Group expects all employees representing Kering or its Houses in the public sphere to act with the utmost integrity and transparency and in full compliance with applicable regulations. To that end, Kering publicly declares its lobbying activity where applicable legislation requires it. Kering respects its employees' right to participate as individuals in the political process as long as they make clear that, in doing so, they do not represent the Group or cannot be perceived as doing so.

Lobbying is an activity that involves contributing to the decision-making process related to policies and regulations likely to affect our activities so that public decision-makers can understand how these regulations could impact us.

DO

- Act in full compliance with applicable laws and regulations where the Group operates when it comes to representing Kering or its Houses in the public sphere;
- Monitor and document internally our interactions with elected representatives or civil servants to ensure transparency and accountability;
- Make clear that employees' personal political activities do not claim to represent Kering in any way. Their personal political activities should neither interfere with their professional responsibilities nor harm the Group's reputation;
- Make sure the actions and positions of our coalitions and professional associations are aligned with our Code of Ethics, our compliance procedures and our sustainability strategy;
- Communicate transparently on our main positions with the aim to contribute to the quality of the public discourse.

DON'T

- Make donations on behalf of the company to any particular political party or candidate;
- Recruit and/or remunerate, whether permanently or temporarily, any member of parliament, or any other elected representative, for the duration of their elective mandate;
- Use the workplace as a political platform.

FAQS

I am or would like to be politically engaged. Should I warn someone at Kering?

Employees are entitled to engage in personal political activities, as long as they make clear that they do not represent Kering in expressing political views. However, you should inform your manager if your participation in political activities could interfere with your professional responsibilities, including with regard to the Group's image and reputation. This information should be formalized through the Group Conflicts of Interest declaration form.

Who may engage with elected representatives at Kering?

Employees may engage as such with elected representatives either because of the nature of their functions or with specific authorization from their manager, in coordination with the Compliance and Internal Audit departments as well as, when appropriate, with the Institutional Affairs department.

NAME OF RELEVANT AND APPLICABLE POLICIES OR PROCEDURES:

- Kering Responsible Lobbying Policy
- Kering Gifts and Hospitality Procedure
- Kering Conflicts of Interest Procedure

WHO TO CONTACT IN CASE OF QUESTIONS OR SUSPICION OF MISCONDUCT:

- Institutional Affairs department
- Compliance department
- Your manager



CONCLUSION

HOW TO REPORT VIOLATIONS

Every employee plays a key role in helping Kering prevent, detect and respond to potential violations of its Code of Ethics and the associated policies and procedures.

As detailed in the relevant factsheet, should employees have question or concerns regarding the implementation of the Code of Ethics, there are different local points of contact at House and Group level, including the line manager, Human Resources Business Partner, and Legal & Compliance Departments.

There is also a possibility to raise concerns via a centralized whistleblowing mechanism, available through an online secured platform.

This system is available not only to all our employees, shareholders, partners, members of the board, external or occasional workers, but also to our suppliers, sub-suppliers and impacted communities and as further detailed in applicable Whistleblowing Policy.

AN INTERNAL WHISTLEBLOWING PLATFORM ORGANIZED AROUND A TAILORED GOVERNANCE

In addition to the usual management channels, Kering has put in place an Ethics and Compliance organization, composed of a Group Committee (Europe) and three regional Committees (APAC, Americas and MEA) functionally reporting to the Group Ethics and Compliance Committee. These Committees are made up of representatives of the Compliance department and include several other functions such as operations, human resources, finance, audit, sustainability and representatives from various Kering Houses.

The role of these Committees is to:

- Handle the alerts according to internal governance. Based on the severity and on the category of the report raised through the platform, the Committees will either directly manage the alerts or will redirect them, on a strict need-to-know basis, to the competent department determined according to internal governance (as detailed in Kering Whistleblowing Policy);
- Review and make recommendations as to the design of the global compliance program, notably based on the reporting of alerts raised through the platform;
- Ensure coordination and coherence in the implementation of specific programs among all Houses and countries;
- Update the Code of Ethics and associated procedures.

HOW TO REPORT A VIOLATION THROUGH THE WHISTLEBLOWING PLATFORM

CONNECTION TO THE WHISTLEBLOWING PLATFORM

[Click here](https://kering.integrityline.com/) to connect to the platform or go to the following address: <https://kering.integrityline.com/>.

A concern is raised by an individual through the platform, either through writing or by a call placed to the hotline (phone numbers accessible on the platform). To provide appropriate information, a questionnaire with mandatory and optional questions will be asked to complete the report, with the possibility to remain anonymous.

RECEPTION OF THE REPORT

The relevant Ethics and Compliance Committee will receive the report and will transfer it to the competent department in charge of assessing and treating the report, such as: Human Resources department, Anti-Fraud Committee, Ethics and Compliance sub-committees.

ASSESSMENT OF THE REPORT

Based on the information provided, the competent department will assess whether the allegations fall under the scope of our Whistleblowing Policy and/or require further information in that respect.

INVESTIGATION OF THE ALERT

If the report qualifies as an alert, an investigation will be performed to shed light on the alleged facts. This investigation can be done through various means including confidential interviews, documentation requests, and audits. The duration of the investigation will depend on many factors, including its complexity.

CLOSING OF THE ALERT - REMEDIAL ACTION PLAN AND FOLLOW-UP

Where relevant and if applicable, appropriate remediation actions will be undertaken (such as update of policies or disciplinary sanctions).

KEY PRINCIPLES GOVERNING THE TREATMENT OF ALERTS

- **Confidentiality:** all alerts are treated with the utmost confidentiality and sub-components are only shared with a limited number of persons, bound by a duty of confidentiality and only on a need-to-know basis;
- **Impartiality:** every concern raised is treated with seriousness, respect, and due process;
- **Non-retaliation:** reprisals (in any form) against the alert issuer are forbidden.

K E R I N G

CREATIVITY IS OUR LEGACY



GUCCI | SAINT LAURENT | BOTTEGA VENETA | BALENCIAGA | MCQUEEN | BRIONI

BOUCHERON | POMELLATO | DODO | QEELIN | GINORI 1735

KERING EYEWEAR