

GROUP WHISTLEBLOWING POLICY

APPROVED BY RESOLUTION
OF THE BOARD OF DIRECTORS OF DECEMBER 20, 2023



FERRAGAMO

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Salvatore Ferragamo S.p.A. and all Ferragamo Group Companies have always been committed to promoting a corporate culture inspired by ethics and legality.

Reports of legal breaches - and in particular reports of Significant Breaches pursuant to the (Italian) Whistleblowing Decree and Foreign Whistleblowing Legislation (as defined below) - may, through adequate enforcement and prevention measures, help to promptly find and deal with critical issues and risks to which all organizations are potentially exposed, including Companies within the Ferragamo Group.

By establishing and encouraging the informed use of their internal reporting channels, the Ferragamo Group Companies aim to prevent and combat unlawful behavior or behavior contrary to the principles and rules set out in their organizational models, codes of ethics and company policies, protecting the confidentiality of whistleblowers and other protected subjects, safeguarding them from the risks of possible retaliation in full compliance with all applicable legal provisions.

1. Subject

This document – entitled “**Group Whistleblowing Policy**” or simply “**Policy**” – identifies the channels and conditions for making Internal and External Reports, as well as Public Disclosures and complaints with Judicial or Accounting Authorities, governs the methods for managing Internal Reports, and defines the protection measures required for the protection of Reporting Persons, Persons Concerned and other parties involved in the Report. The Group Whistleblowing Policy was adopted in compliance with the Whistleblowing Decree and applicable Foreign Whistleblowing Legislation and, among other things, constitutes an integral part of the organizational, management and control policy adopted by Ferragamo pursuant to Legislative Decree No. 231/2001, or other codes of ethics and conduct adopted by the Ferragamo Group Companies.

The Group Whistleblowing Policy, and a summary extract thereof, can be viewed at any time by anyone interested at group.ferragamo.com section governance/whistleblowing, code of ethics, model 231 and policies.

2. Legal References and Definitions

Except as provided for elsewhere, for the purposes of this Policy, the following meanings will be attributed to the legal references and definitions listed below:

- | | | |
|----|---|--|
| A) | Internal Reporting Channels: | Internal reporting channels established by Salvatore Ferragamo S.p.A. and other Ferragamo Group companies to report Information on Breaches, the management of which is entrusted to the Ethics Committee |
| B) | Privacy Code: | Legislative Decree No. 196 of 30 June 2003, as subsequently amended, containing the “Code regarding the protection of personal data” |
| C) | Ethics Committee: | Collegiate body in charge of receiving and managing Internal Reports on behalf of Ferragamo and of the other Ferragamo Group Companies |
| D) | (Italian) Whistleblowing Decree: | Legislative Decree No. 24 of 10 March 2023, concerning the “Transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, on the protection of persons who report breaches of Union law and containing provisions on the protection of persons who report breaches of national regulatory provisions” |
| E) | Legislative Decree No. 231/2001: | Legislative Decree No. 231 of 8 June 2001, as subsequently amended, containing “Rules governing the administrative liability of legal entities, corporations, and associations, including associations without legal status, in accordance with Article 11 of Law No. 300 of 29 September 2000” |
| F) | HR Department: | Area / division / unit / department in charge of managing the human resources of Ferragamo and of the other Group Companies |
| G) | Whistleblowing Directive: | Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, as defined therein |

H)	Public Disclosure:	The making of Information on Breaches available in the public domain through the press or by electronic means or otherwise through means of dissemination capable of reaching a large number of people
I)	Facilitator:	A natural person who assists a Reporting Person in the reporting process in a work-related context, and whose assistance should be confidential;
L)	Ferragamo or Company:	Company incorporated under Italian law with the business name Salvatore Ferragamo S.p.A., with registered office at Via Tornabuoni 2, 50123, Florence, Italy
M)	GDPR:	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data repealing Directive 95/46/EC (general regulation on data protection).
N)	Group or Ferragamo Group:	Group of companies whose parent company is Ferragamo
O)	Information on Breaches:	Information, including reasonable suspicions, about Breaches committed or Breaches which, based on concrete evidence, are likely to occur within Ferragamo or other Group Companies in which the reporting person works or has worked or is or was in contact through their work or professional duties, and about attempts to conceal such Breaches
P)	French Whistleblowing Legislation:	Law No. 2022-401 of 21 March 2022 aiming to improve the protection of reporting persons
Q)	Spanish Whistleblowing Legislation:	Law No. 2/2023 of 20 February, governing the protection of persons reporting information about legal breaches and fight against corruption
R)	German Whistleblowing Legislation:	Whistleblower Protection Act, enacted on 12 May 2023
S)	Foreign Whistleblowing Legislation:	Laws governing the protection of persons who report breaches of applicable legislation in force in the countries where the Ferragamo Group's Foreign Companies are based
T)	Organizational Policy:	Organization, management and control policy adopted by Ferragamo pursuant to Legislative Decree No. 231/2001
U)	Person Concerned or Reported Party:	Natural or legal person mentioned in the Internal Report, External Report or Public Disclosure as a person to whom the Breach is attributed or as a person otherwise implicated in the reported or publicly disclosed Breach
V)	Reporting Person or Whistleblower:	Natural person making an Internal Report, External Report or Public Disclosure of Information on Breaches acquired within their work-related context
Z)	Report:	Written or oral report of Information on Breaches
AA)	Anonymous Report:	Reports not disclosing the whistleblower's identity
BB)	Internal Report:	Written or oral, report of Information on Breaches to the Ethics Committee through Internal Reporting Channels made available by the Group Whistleblowing Policy

CC)	External Report:	Written or oral report of Information on Breaches through the external reporting channels established by the Whistleblowing Decree and by the Foreign Whistleblowing Legislation applicable to the Ferragamo Group's Foreign Companies
DD)	Ferragamo Group Companies:	All companies belonging to the Ferragamo Group
EE)	Foreign Ferragamo Group Companies:	All companies belonging to the Ferragamo Group based in a country other than Italy
FF)	Protected Parties:	All parties who benefit from protection measures under the Group Whistleblowing Policy, Whistleblowing Decree and Foreign Whistleblowing Legislation, including: <ul style="list-style-type: none"> i) Reporting Persons ii) Facilitators iii) people from the same work-related context as the whistleblower's and linked to them by a stable emotional bond or up to the fourth degree of kinship iv) work colleagues of the Reporting Person who work in the same work-related context as them and with whom they have a regular and current relationship v) entities owned by the Reporting Person or for which the same people work, including entities operating in their work-related context
GG)	Breaches:	<ul style="list-style-type: none"> i) breaches of laws applicable to Group Companies ii) breaches of organizational policies (including the Ferragamo Organizational Policy), procedures, regulations, codes of conduct, codes of ethics and policies of Group Companies iii) actions or omissions which, even regardless of the requirements of the Organizational Policy, Code of Ethics or corporate policies and/or procedures of Group Companies, may lead to the infringement of human rights or damage and prejudicial effects for health, the environment, security, or fundamental rights and freedoms iv) any form of retaliation, threat or attempt to retaliate, against the Reporting Person
HH)	Relevant Breaches:	Breaches relevant for the purposes of applying the Whistleblowing Decree to Ferragamo or for the purposes of applying the Foreign Whistleblowing Legislation to the Ferragamo Group's Foreign Companies

3. Scope

3.1 Recipients

This Policy applies to all parties ("**Recipients**") who report Information on Breaches acquired within their work-related context and committed within Ferragamo or other Ferragamo Group Companies with which they maintain or have maintained legal relationships as employed workers, self-employed workers, freelancers and consultants, volunteers and trainees, shareholders, persons entrusted with administrative, management, control, supervisory or representative tasks, workers or collaborators of contractual partners and suppliers of goods and services (all as further specified in **Annex 1**).

The protection measures provided for in Article 5 below apply to Recipients and Protected Persons during the period of work or during any other legal relationship entertained with a Ferragamo Group Company. Such protection measures will also apply during any probationary period and/or before or after the establishment of an employment relationship or other legal relationship with a Ferragamo Group Company.

3.2 Subject of the Report

Reports may concern any Information on Breaches, conduct aimed at concealing the commission thereof or retaliatory measures taken against the Reporting Persons and/ or other Protected Parties. All Recipients are therefore encouraged to report any Breach or conduct aimed at concealing its commission.

3.3 Reporting Requirements

A Report, including in anonymous form, must be made in **good faith, must be detailed** and **provide as many pieces of evidence** so as to allow the recipient to carry out the necessary inspection. In particular, the following must be clearly reported:

- time and place in which the event being Reported occurred;
- description of the event;
- general information or other evidence ensuring identification of the person responsible for the event being reported.

It would also be useful to attach documents that can corroborate the event being Reported, including information on other persons potentially aware of the event.

The Reporting Person need not be absolutely certain of the actual occurrence of the event being reported and of the person responsible for the same, but, based on their knowledge, it will be sufficient for them to believe it **highly likely** that an illegal or non-compliant event has occurred which constitutes a Breach on the basis of concrete evidence.

The reasons leading such person to make a report will be irrelevant for the purposes of processing the Report and granting protection measures.

3.4 Reports Outside the Scope of the Policy

Reports concerning personal complaints of the Reporting Person or requests pertaining to regulations governing the employment relationship or relations with superiors or colleagues are **outside** the scope of this Policy. Reports of breaches relating to national security or relating to events, information and documents the reporting or disclosure of which is prohibited by legislation governing medical secrecy, secrecy of judicial decisions, secrecy of judicial investigations or professional secrecy of lawyers are also outside the scope of this Policy.

3.5 Reports Not Permitted

Clearly unfounded Reports based on mere suspicions, indiscretions or unreliable rumors; Reports made with malice (bad faith) or gross negligence; Reports relating to Information on Breaches already in the public domain, will **not be allowed** in any way.

4. Reporting Channels

4.1 General Principles

In accordance with the Whistleblowing Decree and the Foreign Whistleblowing Legislation transposing the Whistleblowing Directive, the Report submission system will be structured on three levels:

1. **Internal Reporting Channels** established by Ferragamo and by the other Ferragamo Group Companies, whose management is entrusted to the Ethics Committee and **access to which should be understood as preferential** given the proximity of these Channels to the origin of the issues being Reported; Internal Reporting Channels may be used to submit Reports relating to all the Companies of the Ferragamo Group;
2. **External Reporting Channels** established by Public Authorities set up by the European Union Member States for such purpose; External Reporting Channels may only be used to submit Reports relating to Ferragamo Group Companies residing in Member States of the European Union, under the conditions and in the manner described below;
3. **Public Disclosure** through the press or by electronic means or otherwise by means of diffusion capable of reaching a large number of people; use of Public Disclosure is permitted and protected only in relation to Relevant Breaches involving Ferragamo Group Companies residing in Member States of the European Union, under the conditions described below.

A complaint may be filed with the Judicial or Accounting Authorities in the event that Union or national law requires the Reporting Person to contact the competent national authorities, for example as part of their duties and professional responsibilities or because the breach constitutes a crime.

Lastly, the right to make use of other reporting channels that may be provided for and guaranteed for Recipients pursuant to applicable Foreign Whistleblowing Legislation will remain without prejudice.

4.2 Internal Reporting Channels

Ferragamo and the other Ferragamo Group Companies have established the Internal Reporting Channels described below to allow Recipients to submit Reports in written or oral form, including by requesting face-to-face meetings.

The operation of the Internal Reporting Channels has been entrusted to the Ethics Committee appointed by the Company's Board of Directors.

The Board of Directors is responsible for appointing and dismissing the members of the Ethics Committee and for defining its number.

The names of the Ethics Committee members in office are published in the Governance section of Salvatore Ferragamo's corporate website: <http://group.ferragamo.com/it/governance/>

Internal Reporting Channels guarantee the confidentiality of the identity of the Reporting Person, of the Reported Party and of any Persons howsoever Concerned or mentioned in the Report, as well as of the content of the Report and documentation related thereto, in accordance with the Whistleblowing Decree, the Foreign Whistleblowing Legislation, the Privacy Code, the GDPR and other applicable legislation on the protection of personal data.

4.2.1 Written Reports

Written Reports may be forwarded to the attention of the Ethics Committee through the following channels:

A. Dedicated Website <https://salvatoreferragamo.integrityline.com/> (hereinafter, “**Web Platform**”).

Ferragamo and the other Ferragamo Group Companies suggest the preferential use of the Web Platform for sending Internal Reports as it provides guarantees of maximum confidentiality in regard of the identity of the Reporter, of the Reported Party and of any persons mentioned in the Report, as well as of the content of the Report and documentation related thereto, as it is operated by a third-party service provider¹. The Web Platform enables the sending of Reports by providing the Reporting Person’s personal details or the sending of Anonymous Reports. The Ethics Committee may interact with any known or anonymous Reporting Person by providing them with a Report identification code (“**Identification Code**”) which will allow them to subsequently gain access to the Web Platform and check any follow-ups. Once logged in to the Web Platform, the Reporting Person will select their language and the country of residence of the Ferragamo Group Company in which the Breach occurred. Subsequently, the Reporting Person will be guided by the system for the purpose of completing their Report.

B. E-mail message to ethics.committee@ferragamo.com (hereinafter, “**Email Address**”).

In the event that the Reporting Person decides to use the Email Address, the e-mail subject must clearly state whether the Reporting Person’s identity should be kept strictly confidential benefiting from the protections provided in the event of any retaliation suffered as a result of the Report, using the following heading:

“Secret and confidential whistleblowing report protected under the law”

In this case, communication between the Ethics Committee and the Reporting Person will only be permitted if the e-mail address used by the latter for sending the Report was a valid one. Conversely, the Ethics Committee will not be able to contact the Reporting Person if the latter has used an anonymous or, otherwise, false email account, without providing further contact details.

C. Mail letter sent to: Ferragamo Ethics Committee

Via Mercalli 201, 50019 Osmannoro, Sesto Fiorentino (FI)

(hereinafter, “**Mailbox**”),

stating the following on the envelope: “***Private Confidential***”

In the event that the Reporting Person decides to use the Mailbox, the subject of the letter must clearly state whether the Reporting Person’s identity should be kept confidential benefiting from the protections provided in the event of any retaliation suffered as a result of the Report, using the following heading:

“Secret and confidential whistleblowing report protected under the law”

Also in this case, communication between the Ethics Committee and the Reporting Person will only be permitted if the latter provides the Committee with the contact details to be used.

¹ The Web Platform is operated by an external company, which specializes in internal reporting systems for companies. Therefore, data are neither transferred nor managed via the servers of Ferragamo or of the other Ferragamo Group Companies. This ensures that reports cannot be traced, the data are always protected and only authorized members of the Ethics Committee may have access to it. Further information on this service is available at the web address stated above.

4.2.2 Oral Reports

With effect from 1 October 2023, oral Reports may be made by using the voice messaging system contained in the Web Platform. Before the above date, oral Reports may be made by calling the following telephone number +39 0553568800.

4.2.3 Face-to-Face Meetings

In addition to the foregoing, within a reasonable term in any case not exceeding 15 (fifteen) working days from the request filed by the Reporting Person, the Ethics Committee will be required to make itself available to arrange for a face-to-face meeting with the Reporting Person who so requests, to be held by videoconference or in person at the location of the Ethics Committee or at another location chosen by the same ("**Face-to-Face Meeting**").

Should the request for a Face-to-Face Meeting concern Reports on Salvatore Ferragamo S.p.A., Ferragamo France S.A.S., Ferragamo España S.A., Ferragamo Deutschland GmbH or other Group Companies which, under mandatorily applicable Foreign Whistleblowing Legislation, are required to grant the Reporting Persons a Face-to-Face Meeting, the Ethics Committee may empower one or more of its members to participate in such meeting at the legal or operational headquarters of the Group Company concerned, including with the support of a translator.

If none of its members are able to participate, the Committee may also assign powers to the head of a local corporate department or appoint a local third-party consultant to the Group Company concerned ("**Company Representative**"), with the necessary skills and professional experience, in order to promptly receive the Report in compliance with all the provisions contained in this Group Whistleblowing Policy and in the Regulations of the Ethics Committee.

4.2.4 Anonymous Reports

Insofar as permitted by law and by the Internal Reporting Channels used, Reports may also be made anonymously.

Anonymous Reports, where detailed, will be treated by the Ethics Committee in the same way as Internal Reports made by known Reporting Persons.

The provision referred to in this Policy and, in particular, the protection measures provided for in Article 5 below, will also apply to Anonymous Reporting Persons who have subsequently been identified and have suffered retaliation.

4.3 Handling Internal Reports

In order to ensure the efficient and timely handling of Internal Reports received by the Ethics Committee, it has been approved the **Regulations of the Ethics Committee** ("**Regulations**"), which regulated in detail the formal process to be followed by the Committee and to which reference is made for more in-depth considerations.

Regulatory provisions also apply to Internal Reports received by the Ethics Committee as an independent external entity operating in the interest and under authority of all the other Ferragamo Group Companies, in compliance with the principles of confidentiality, objectivity, independence, competence and professional diligence.

4.3.1 Internal Reporting Handling Process

After receiving an Internal Report, the Ethics Committee will be required to:

- a. release an **acknowledgment of receipt of the Report to the Reporting Person within 7 (seven) days** from the date of receipt of the Report;
- b. perform a **preliminary inspection** in order to assess the relevance, scope and potential risks arising from the event being reported;

- c. **diligently provide follow-ups on the Report**, maintaining communication with the Reporting Person and carrying out the appropriate internal investigations to verify the events being reported; to this end, the Ethics Committee may also make use of the collaboration of other corporate departments or third-party consultants and translation services, under the conditions and in the manner established by the Regulations;
- d. provide **feedback to the Reporting Person within 3 (three) months** from the date of the acknowledgment of receipt or, failing such notice, within 3 months from the expiry of the 7-day term from the submission of the Report, containing information on any current or future follow-ups to the Report, including the notification that the requirements for proceeding with the investigation have not been met, which would entail the related dismissal of the Report;
- e. propose **remedial and/or improvement actions** in relation to the Breach reported to competent corporate departments of the Group Company concerned by the Report and verify their adoption or the reasons underlying their non-adoption.

The Ethics Committee may decide to dismiss a Report in the event that the same concerns Breaches other than Relevant Breaches, in this case providing information to the Reporting Person, where possible, on the entities responsible for such reports.

The Ethics Committee will provide the Reporting Person with acknowledgment of receipt of the Report and any information in the same manner in which the Report was sent by them, where possible².

If the Ethics Committee decides to make use of the support of other local corporate departments or external consultants ("**External Consultants**" or, simply "**Consultants**") to carry out the necessary in-depth investigations concerning the Report content, both the corporate departments and the Consultants will be required to respect the utmost confidentiality on the content of such Report.

It is understood that (i) in the presence of predicate offenses or breaches laid down in Legislative Decree No. 231/2001 or in foreign laws concerning the administrative liability of entities or the prevention of offenses as well as (ii) in the event of breaches of the Ferragamo Organizational Policy or Code of Ethics and/or corporate rules/procedures, codes of conduct and organizational policies adopted by other Ferragamo Group Companies, the Committee will promptly inform the Supervisory Body or the competent bodies.

4.3.2 Retention and Reporting

In order to guarantee the systematic management and traceability of Reports and related inspection activities, the Ethics Committee will archive and store Reports (including anonymous Reports), as well as any documents, reports, transcripts and minutes related thereto, in a special digital repository ("**Repository**")³. In compliance with all applicable legal provisions, any paper documents will be suitably destroyed after being scanned.

Access to the Repository, as well as consultation of the documents stored therein, is only and exclusively permitted to members of the Ethics Committee, who will be the only persons possessing the relevant keys and passwords.

The Reports, and documentation related thereto, will be retained by the Ethics Committee:

- for **1 (year)**, if archived because they were deemed unfounded;
- for the time necessary to process the Report and in any case **not beyond 5 (five) years**⁴ from the date of notification of the final outcome of the reporting procedure, in compliance with the confidentiality obligations established by the Whistleblowing Decree, by Foreign Whistleblowing Legislation, by the Privacy Code, by the GDPR and/or other personal data protection laws that may be applicable. After 5 years, the Reports, and documentation related thereto, will be erased⁵.

² The Web Platform contains a feature for the exchange of information between the Reporting Person and the Ethics Committee through access to a confidential box that can be used - via an Identification Code - even if the whistleblower decides to remain anonymous.

³ With regard to **Ferragamo España S.A.**, the Ethics Committee has established a registry of Reports received and of the resulting investigations conducted ("**Whistleblowing Registry**"), ensuring the confidentiality requirements in all cases. Access to the Whistleblowing Register is only permitted to members of the Ethics Committee. Persons other than the Members of the Ethics Committee will be able to access all or part of the contents of the Whistleblowing Registry only upon a reasoned request from the competent Spanish Judicial Authority by order issued as part of judicial proceedings and under the protection of such Authority.

⁴ With regard to **Ferragamo España S.A.**, it should be noted that it is not permitted to retain personal data relating to Reports received and internal investigations conducted for a period exceeding 10 (ten) years. Therefore, after this period they must be erased.

⁵ The processing of data on the Web Platform provides for the highest security standards. The data contained therein may only be erased following the joint approval of two members of the Ethics Committee.

In any case, any personal data clearly not useful for the processing of a specific Report will not be collected or, if collected accidentally, will be immediately erased.

With regard to **Ferragamo**, the Ethics Committee will, at least annually, provide summary information on the Reports handled to the Board of Directors, the Chief Executive Officer, the Control and Risk Committee, the Company's Board of Statutory Auditors, and the Supervisory Body.

With regard to the **other Ferragamo Group Companies**, the Ethics Committee will, at least annually, provide summary information on the Reports handled to the members of the related governing and control bodies.

4.3.3 Reports Involving Members of the Ethics Committee

If the Committee receives a Report involving one of its members, the Ethics Committee will refer the investigation to the Supervisory Body, which may make use of Consultants meeting the necessary professional requirements and subject to the assumption of privacy and confidentiality obligations, in compliance with the provisions of the Regulation of the Ethics Committee or supervisory bodies of the Ferragamo Group Company concerned.

4.4 Internal Reports Erroneously Sent to an Entity Other than the Ethics Committee.

Internal Reports erroneously sent to an entity other than the Ethics Committee will be forwarded to the Committee itself within 7 (seven) days of its receipt by the recipient party.

Once the Report has been received from the first recipient, the Ethics Committee will - where possible - notify the Reporting Person, unless the recipient party has already done so.

The Report thus received by the Ethics Committee will be treated and managed according to the provisions of **paragraph 4.3.1** above and according to the Regulation.

As a result of the foregoing, **anyone** who has in any capacity received Reports of Breaches will be required to:

- forward or deliver the Report to the Ethics Committee;
- keep the strictest confidentiality in relation to the identity of the Reporting Person, the Reported Party and the other Parties Involved or mentioned in the Report;
- not to disclose and keep the strictest confidentiality in relation to the content of the Report and any documents attached thereto;
- if an erroneously received Report is contained in an e-mail, proceed with its erasure on a final basis after forwarding it to the Ethics Committee.

4.5 External Reporting Channels

Without prejudice to the preference for the Internal Reporting Channels described in the preceding paragraphs with regard to Reports relating to Breaches involving Ferragamo, Ferragamo France S.A.S., Ferragamo España S.A. and Ferragamo Deutschland GmbH⁶, the Recipients may also send their Reports through the **External Reporting Channels** established by the Public Authorities set up by the relevant European Union Member States for such purpose.

The list of External Reporting Channels and of the competent Public Authorities in Italy, France, Spain and Germany is included in **Annex 2** to this Policy⁷

These Channels ensure the confidentiality, including through the use of encryption tools, of the identity of the Reporting Person, of the Person Concerned and mentioned in the Report, as well as of the content of the Report and documentation related thereto.

However, access to the External Reporting Channels is **only permitted in regard of Relevant Breaches specified in Annex 3** and if the (alternative) **conditions** provided for by the Whistleblowing Decree, and by the Foreign Whistleblowing Legislation, have been met, as described below:

⁶ The list of Ferragamo Group Companies whose Reports may be forwarded through External Reporting Channels and Public Disclosure will, if necessary, be updated specifying the Ferragamo Group Companies may fall within the scope of future applicable Whistleblowing Directives and local Whistleblowing Legislation.

⁷ The list of External Reporting Channels and of the competent Public Authorities will, if necessary, be updated specifying the competent Public Authorities in other Member States where the registered office of Ferragamo Group Companies is located and which may fall within the scope of applicable future Whistleblowing Directives and local Whistleblowing Legislation.

- a. the Internal Reporting Channels are not active or, even if activated, do not comply with the provisions of the Whistleblowing Decree and of the Foreign Whistleblowing Legislation;
- b. the Reporting Person has already made an Internal Report and the same has not been followed up;
- c. the Reporting Person has reasonable grounds to believe that, if they were to make an Internal Report, it would not be followed up effectively or that the same Report could lead to the risk of retaliation;
- d. the Reporting Person has reasonable grounds to believe that the Breach may constitute an imminent or obvious danger to the public interest.

The management of External Reports will be entrusted to the Public Authorities with which External Reporting Channels have been set up, according to the procedures established by them in their own regulations or guidelines, to which reference is made⁸.

4.6 Public Disclosure

Recipients may also make a **Public Disclosure** by making **the Information on Relevant Breaches specified in Annex 3 available in the public domain** if relating to Ferragamo, Ferragamo France S.A.S., Ferragamo España S.A. and Ferragamo Deutschland GmbH, through the press or by electronic means or in any case through means of diffusion capable of reaching a large number of people (including social networks).

In order for the Reporting Person to benefit from the protection measures granted in **Article 5 below**, Public Disclosure may only be performed under the (alternative) **conditions** provided for by the Whistleblowing Decree and the Foreign Whistleblowing Legislation, as described below:

the Reporting Person has previously made an Internal Report and an External Report or has made an External Report directly (under the conditions and in the manner set out in **paragraph 4.3**) and no response has been given within the established terms regarding the measures required or adopted to follow up on such Report;

the Reporting Person has reasonable grounds to believe that the Breach may constitute an imminent or obvious danger to the public interest;

the Reporting Person has reasonable grounds to believe that the External Report may involve the risk of retaliation or may not be followed up effectively due to the specific circumstances of the concrete case, such as those in which evidence may be hidden or destroyed or there is a well-founded fear that whoever has received the Report may be colluding with the perpetrator of the Breach or person involved in the Breach.

In Public Disclosures, should the Reporting Person voluntarily reveal their identity, the Ethics Committee will not be able to ensure the protection of the confidentiality of their identity or of the content of the Report already in the public domain, without prejudice to all the other protection measures provided for in **Article 5** below.

However, if the Reporting Person discloses breaches by, for example, using a pseudonym or a nickname that does not otherwise allow identification, the Public Disclosure will be treated in the same way as an Anonymous Report (**see: paragraph 4.2.4**).

4.7 External Reporting Channels under Mandatorily Applicable Foreign Whistleblowing Legislation

The right to make use of other external reporting channels not contemplated in the preceding paragraphs, as may be provided for and guaranteed for the benefit of Recipients under mandatorily applicable Foreign Whistleblowing Legislation will be without prejudice.

⁸ With reference to the management of the Italian External Reporting Channels, reference should be made to the document "*Linee guida in materia di protezione delle persone che segnalano violazioni del diritto dell'Unione e protezione delle persone che segnalano violazioni delle disposizioni normative nazionali – procedure per la presentazione e gestione delle segnalazioni esterne*" (Guidelines on the protection of persons who report violations of EU law and protection of persons who report violations of national regulatory provisions - procedures for submitting and managing external reports) adopted by ANAC.

5. Protection Measures

In order to encourage the submission of Reports in the interests of corporate integrity, Ferragamo and the other Ferragamo Group Companies undertake to offer the **Reporting Person** and other **Protected Parties** the protection measures provided for by the Whistleblowing Decree and by Foreign Whistleblowing Legislation. In particular, the protection framework includes the following types of protection:

1. **protection of the confidentiality** of the Reporting Person, Facilitator, Person Involved and persons mentioned in the Report (**see: paragraph 5.2**);
2. **protection from any retaliatory measures** adopted as a result of the Internal Report, External Report, Public Disclosure or complaint made (**see: paragraph 5.3**);
3. **limitations of liability** for the disclosure and dissemination of certain categories of information (**see: paragraph 5.4**);
4. **provision of support measures by Third Sector entities** (**see: paragraph 5.5**).

Any full or partial waivers or settlements (for example, under agreements or other contractual conditions) concerning the rights and protections provided for in this Policy will be void, unless they have been made in protected (judicial, trade union, administrative) offices in accordance with applicable legislation.

5.1 Additional Protection Measures Concerning Ferragamo España S.A.

With specific regard to Reports concerning **Ferragamo España S.A.**, the Reporting Person will be able to benefit from the following additional protection measures:

- **financial and psychological support**, on an exceptional basis, if decided by the Spanish Independent Authority for the Protection of Reporting Persons, after assessing the circumstances arising from the submission of the Report;
- possible **exemption from or mitigation of any applicable penalties**, if the Reporting Person has participated in the commission of the reported Breach.

5.2 Protection of Confidentiality

Ferragamo and the other Ferragamo Group Companies will protect the confidentiality of the identity of the Reporting Person, of the Facilitator, of the Person Concerned and of the persons mentioned in the Report, as well as the content of the Report, and documentation related thereto, in accordance with the Whistleblowing Decree, the Foreign Whistleblowing Legislation, the Privacy Code, the GDPR and other applicable legislation on the protection of personal data.

This also in order to avoid the exposure of such parties to retaliatory measures or damage to their reputation that might ensue following the Report.

5.2.1 Responsibilities of the Ethics Committee and of Other Entities Involved in the Handling of Internal Reports

The Ethics Committee receiving Reports will be responsible for maintaining the confidentiality thereof, avoiding the disclosure of data acquired to parties unrelated to the process of inspecting and investigating the Reports, unless the Reporting Person has given their consent. As a partial exception to the foregoing and in compliance

with the provisions of its Regulations, the Ethics Committee may disclose such information to the corporate departments or external consultants that the Committee decides to make use of for the purpose of carrying out internal investigations, to the extent that their knowledge thereof is indispensable for their understanding of the events being reported. In these cases, the responsibility for ensuring confidentiality will also extend to such corporate departments or Consultants involved.

Confidentiality will also be maintained by prohibiting the disclosure of information contained in the Report which may, either directly or indirectly, reveal the identity of the Reporting Person, of the Facilitator or of other parties involved.

This general principle does not preclude or limit any reporting obligations that may arise as a result of Reports vis-à-vis the Judicial Authorities or other competent authorities in the countries in which the Ferragamo Group Companies operate, nor any reporting obligation to the statutory control bodies that may have been established within the same.

5.2.2 Protection of Confidentiality in the Judicial and Disciplinary Areas

Confidentiality will also be ensured in the judicial and disciplinary areas.

In the event that **criminal proceedings** have been initiated following a Report, the identity of the Reporting Person will be covered by secrecy in the manner and within the limits established by the applicable code of legal procedure and, generally, not beyond the conclusion of the preliminary investigations.

In the event that **disciplinary proceedings** have been established following a Report, the identity of the Reporting Person will not be disclosed if the disciplinary charges are based on separate and additional assessments with respect to the Report, including if resulting from the same. If the dispute is based, in whole or in part, on the Report and knowledge of the identity of the Reporting Person is indispensable for the accused to defend themselves, the Report may be used for the purposes of the disciplinary proceedings only if the Reporting Person has expressly given their consent to the disclosure of their identity.

The Ethics Committee will give written notice to the Reporting Person of the reasons for the disclosure of confidential data if the disclosure of the identity of the Reporting Person and of information from which such identity may be, directly or indirectly, inferred is also indispensable for allowing the Person Concerned to defend themselves.

5.2.3 Protection of the Person Concerned

In support of their right to defend themselves, the **Person Concerned** may be heard, or, at their request, will be heard by the Ethics Committee including by means of documentary proceedings by acquiring written briefs and documents, to the extent that the foregoing complies with applicable labor legislation.

5.2.4 Personal Data Processing

The processing of personal data when receiving and managing Reports will be carried out in compliance with the Whistleblowing Decree, the Foreign Whistleblowing Legislation, the Privacy Code, the GDPR and other applicable legislation on the protection of personal data, according to the content of the **Privacy Statement** available on the appropriate web platform or otherwise provided to the Reporting Person and to the other parties involved in the Report.

5.3 Protection against Retaliatory Measures

Ferragamo and the other Ferragamo Group Companies will prohibit **any retaliation against the Reporting Persons and the other Protected Parties**, to be understood as any behavior, act or omission, even if only attempted or threatened, put in place as a result of an Internal or External Report, Public Disclosure or complaint with the Judicial or Accounting Authorities, which directly or indirectly causes, or may cause, unfair damage to such parties.

Any acts entered into in breach of this prohibition of retaliation will be **void**.

The Reporting Person or Protected Party who has suffered retaliation will:

- have the **right to take action for compensation for any damage suffered** before the competent Judicial Authorities;
- if they have been dismissed as a result of the Report, Public Disclosure or complaint with the Judicial or Accounting Authorities, **they will have the right to be reinstated in the workplace**, pursuant to applicable legislation and based on specific rules applicable to the worker.

As part of any **judicial or administrative proceedings or in any case of out-of-court disputes concerning the assessment of retaliation** against the Reporting Persons and other Protected Parties, it will be presumed that such retaliation has been put in place as a result of the Report, Public Disclosure or complaint with the Judicial or Accounting Authorities. The **burden of proving** that such conduct or acts were based on grounds unrelated to the Report, Public Disclosure or complaint rests with the person who put them in place.

In the event of a **claim for compensation** submitted to the Judicial Authority by the Reporting Person or by the other Protected Parties, if such parties prove that they have filed a Report, Public Disclosure or complaint with the Judicial or Accounting Authorities and that they have suffered damage, it will be presumed, unless proven otherwise, that the damage was a consequence of such Report, Public Disclosure or complaint with the Judicial or Accounting Authorities.

5.3.1 Retaliatory Measures

The following will, inter alia, be understood as retaliatory measures:

- a. dismissal, suspension, or equivalent measures;
- b. demotion or withholding of promotion;
- c. transfer of duties, workplace change, reduction in wages, change in working hours;
- d. suspension from training or any restricted access to the same;
- e. negative performance assessment or referral;
- f. adoption of disciplinary measures or other penalties, including cash penalties;
- g. coercion, intimidation, harassment or ostracism;
- h. discrimination or any unfavorable treatment;
- i. failure to convert a fixed-term employment contract into an open-ended employment contract, where the worker has a legitimate expectation of such conversion;
- j. failure to renew, or early termination of, a temporary employment contract;
- k. harm, including to the person's reputation, particularly in social media, or financial or economic loss, including loss of business opportunities and loss of income;
- l. blacklisting on the basis of a business sector or industry-wide informal or formal agreement which may entail that the person will not, in the future, find employment in that business sector or industry;

- m. early termination or cancellation of a contract for goods or services;
- n. cancellation of a license or permit;
- o. Request to be subjected to psychiatric or medical checkups.

5.3.2 Conditions in Order to Benefit from Protection against Retaliatory Measures and Cases of Exclusion

For the Reporting Person and other Protected Parties to be able to benefit from protection against retaliatory measures the following (cumulative) **conditions** must be met:

1. the Reporting Person has filed a Report, Public Disclosure or complaint based on a reasonable belief that the Information on the reported, disclosed or stated Breach is true and falls within the scope of Relevant Breaches;
2. the Report or Public Disclosure filed meets the conditions required by the Whistleblowing Decree and by the Foreign Whistleblowing Legislation, transposed in this Policy;
3. there is a cause-and-effect relationship between the Report, Public Disclosure and complaint filed and the retaliatory measures suffered.

Unless the above conditions have been met, **protection will not be granted** to the Reporting Person and, similarly, to the various parties referred to in paragraph 3.1.1 who have been indirectly subjected to retaliation due to the role they performed within the reporting and/or complaint process and/or due to the particular relationship that binds them to the reporting person or whistleblower.

Any protection afforded in the event of **retaliation will also be ruled out in the event of a judicial decision, including not on a final basis in the first level of judgment, convicting the Reporting Person under criminal law for the crimes of slander or defamation**, or otherwise for the same crimes associated with the complaint, or holding the Reporting Person **liable under civil law** due to having intentionally reported false information with willful misconduct or negligence. In the event that the aforementioned responsibilities have been assessed, a **disciplinary penalty** will also be applied to the Reporting Person.

5.3.3. Notification of Retaliation Suffered to the Competent Public Authorities

The Reporting Person and the other Protected Parties who believe they have suffered retaliation may notify such event to the competent Public Authorities established by the European Union Member States, listed in **Annex 2**, requesting their protection.

It should be noted that anyone **who has adopted** the retaliatory measure and/or act, or anyone whom such behavior and/or omission is otherwise attributable to, will be considered **responsible for the retaliatory measure**. Responsibility will also be imputed on **anyone who has suggested or proposed** the adoption of any form of retaliation against the Reporting Person or the other parties referred to in paragraph 3.1.1, thus producing an indirect negative effect on their position (for example, by proposing a disciplinary penalty).

5.4 Limitation of Responsibilities

The Reporting Person will also be ensured a **limitation of responsibility with respect to the disclosure and dissemination of certain categories of information**. These are limitations that operate when certain conditions have been met, failing which there would be consequences in terms of criminal prosecution, civil liability, and administrative liability.

In particular, the Reporting Person will not be punishable when they have disclosed or disseminated Information on Breaches:

- covered by an obligation of confidentiality (ex-officio, professional, scientific and industrial secrets, breach of the duty of loyalty and trust), with the exception of obligations of confidentiality relating to classified information, forensic and medical professional secrecy, secrecy concerning decisions of judicial bodies;
- relating to the protection of copyright or protection of personal data;
- that harm the reputation of the reported party.

Such limitation of responsibility applies provided that the following (cumulative) **conditions** have been met:

1. at the time of disclosure or dissemination, the Reporting Person had reasonable grounds to believe that the Information was necessary to reveal the Breach;
2. the Internal or External Report, Public Disclosure or complaint was filed under the conditions established by the Whistleblowing Decree and by the Foreign Whistleblowing Legislation, transposed in this Policy;
3. the information was acquired lawfully.

5.5 Supporting Measures by Third Sector Entities

The Reporting Person may benefit from the **supporting measures** offered by **Third Sector entities** that have entered into agreements to this end with the public authorities established by the European Union Member States for such purpose.⁹

In particular, such entities provide free-of-charge assistance and advice:

- on the Reporting procedure;
- on protection against retaliation granted by national and European Union legislation;
- on the rights of the Person Concerned;
- on the procedure and conditions to gain access to legal aid at the expense of the State.

5.6 Other Protection Measures under Mandatorily Applicable Foreign Whistleblowing Legislation

Any additional protection measures not contemplated in the preceding paragraphs, as may be provided for and guaranteed for the benefit the Reporting Persons and Protected Parties under mandatorily applicable Foreign Whistleblowing Legislation will be without prejudice.

6. Disciplinary Penalties and Other Measures

In the event that the investigations carried out following any Internal Reports received have revealed breaches of the law, Code of Ethics or corporate procedures, **disciplinary penalties may**, on the proposal of the Ethics Committee and on the initiative of the competent HR Department in relation to each Ferragamo Group Company, **be imposed on employees held responsible**, to be applied progressively in relation to the seriousness of the act and within the limits of the regulatory framework in force.

⁹ In Italy, ANAC has published a list of Third Sector entities offering support measures to Reporting Persons on its corporate website.

If the parties responsible for the assessed Breaches are **third-party collaborators, the contract**, assignment or in general relationship in place with the Ferragamo Group Companies concerned may be **terminated** and **compensation for damages** claimed, if the relevant conditions have been satisfied.

If the assessed Breaches are attributable to **members of the Corporate Bodies or attorneys** of the Ferragamo Group Companies, the Ethics Committee will promptly inform the governing body of the Ferragamo Group Company involved, so that the appropriate measures are taken.

Should the assessed Breaches concern a **member of the Ethics Committee**, such member will be removed from the office held within the Committee, without prejudice to the possible imposition of disciplinary or contractual penalties as may be respectively required.

In the event that the investigations carried out show that a Report was filed in “bad faith” or in the event of breaches of this Policy, or failure to protect the Reporting Person, or acts of retaliation against them, similar disciplinary penalties may be imposed on the parties held responsible.

Any disciplinary penalties, or other measures, adopted for Breaches assessed following Reports will be notified by the HR Department, or other departments responsible for their imposition, to the Ethics Committee, which, depending on the relevance, will proceed to promptly inform the Reporting Person, the governing and control bodies and/or any Group companies involved¹⁰.

7. Penalties

Breaches of the Whistleblowing Decree and of the Foreign Whistleblowing Legislation may lead to the imposition of administrative penalties or time in prison for the party held responsible, diversified according to the country in which such breaches have been committed.

The penalties that may be imposed and the Public Authorities competent for such purpose are listed in **Annex 4**.

8. Adoption and Dissemination

This Policy has been adopted by Ferragamo and by the Ferragamo Group’s Foreign Companies, which promote its dissemination to:

- all employees by publication in repositories of corporate procedures;
- all corporate bodies by notification to each Company’s governing bodies;
- attorneys and collaborators who, in any capacity, operate in the name and on behalf of the Group Companies, by notification in hard copy or electronic format, ensuring adequate proof of receipt;
- third parties by publication on the website.

Likewise, the Policy will also be distributed to each new employee at the time of dissemination of the Organizational Policy, Code of Ethics and other relevant corporate procedures.

To this end, each Group Company will be required, where necessary, to ensure that the Policy is translated into the local language and will be responsible for its effective adoption.

The Ethics Committee will have the task of monitoring that this Policy complies with best practices, the Whistleblowing Decree and Foreign Whistleblowing Legislation, overseeing its implementation and ensuring that the Web Platform is kept in operation for the collection and management of Reports¹¹, in addition to promoting and coordinating educational and training activities on its operation.

¹⁰ As required by Italian regulations, should disciplinary penalties, or other measures, be imposed following breaches entailing offenses under Legislative Decree No. 231/2001, i.e. the Organizational Policy adopted for the purpose of the prevention thereof, the same will be notified to the Supervisory Body.

¹¹ To this end, the Ethics Committee will inform the Group Compliance department of any inefficiencies in, and opportunities for upgrading, the report management procedure in order to ensure that the necessary actions are taken for the improvement thereof.

ANNEX 1: Policy Recipients - Reporting Persons

This Policy applies to all persons who report Information on Breaches acquired within their work-related context and committed within Ferragamo or other Ferragamo Group Companies with which they have, or have had, a legal relationship in the capacity of:

- **employed workers**, including holders of a part-time, full-time or intermittent, fixed-term or open-ended employment contract, administration, apprenticeship, ancillary employment relationship, or workers who perform occasional services;
- **self-employed workers**, including holders of work contracts (for professional practice for which registration in specific registers or lists is required), agency relationships, commercial representation and other collaboration relationships that take the form of a continuous and coordinated performance of work duties, mainly in person while not being directly employed by the company (for example, lawyers or engineers who perform work duties independently);
- **freelancers and consultants;**
- **volunteers and trainees**, whether paid or unpaid;
- **shareholders**, i.e. natural persons who hold shares in Ferragamo Group Companies;
- **people performing administrative, management, control, supervisory, or representative duties**, including if such duties are performed merely de facto and, therefore, without the appropriate formal appointment;
- **workers or collaborators** who supply goods or services or carry out work on behalf of Ferragamo Group Companies (including, in particular, suppliers).

ANNEX 2: External Reporting Channels and Competent Public Authorities

A list of External Reporting Channels and Public Authorities in charge of Reports relating to **Salvatore Ferragamo S.p.A.**, **Ferragamo France S.A.S.**, **Ferragamo España S.A.** and **Ferragamo Deutschland GmbH** is shown below.

COMPANY	PUBLIC AUTHORITY	EXTERNAL REPORTING CHANNELS
SALVATORE FERRAGAMO S.P.A	Autorità Nazionale Anticorruzione (ANAC, Italian National Anti-Corruption Authority)	The External Reporting Channels managed by ANAC may be accessed at this link: https://www.anticorruzione.it/-/whistleblowing .
FERRAGAMO FRANCE S.A.S.	PUBLIC PROCUREMENT CONTRACTS: <ul style="list-style-type: none"> • Agence française anticorruption (AFA, French Anti-Corruption Agency), for breaches of probity • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF, Directorate General for Competition, Consumer Affairs and Fraud Prevention), for anti-trust practices • Autorité de la concurrence, pour les pratiques anticoncurrentielles (French anti-trust authority) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	FINANCIAL SERVICES, PRODUCTS AND MARKETS, AND PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING; <ul style="list-style-type: none"> • Autorité des marchés financiers (AMF, authority for the supervision of financial markets), for lenders in investment services and market infrastructures • Autorité de contrôle prudentiel et de résolution (ACPR, Prudential supervisory authority), for credit institutions and insurance organizations 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	PRODUCT SAFETY AND CONFORMITY; <ul style="list-style-type: none"> • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF, Directorate General for Competition, Consumer Affairs and Fraud Prevention) • Service central des armes et explosifs (SCAE, Central service of weapons and explosives) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.

FERRAGAMO FRANCE S.A.S.	<p>TRANSPORT SAFETY;</p> <ul style="list-style-type: none"> • Direction générale de l'aviation civile (DGAC, General directorate for civil aviation), for air transport safety, Bureau d'enquêtes sur les accidents de transport terrestre (BEA-TT, Land Transportation Accident Investigation Bureau), for land transport safety (by road or railway) • Direction générale des affaires maritimes, de la pêche et de l'aquaculture (DGAMPA, Directorate General for Maritime Affairs, Fisheries and Aquaculture), for sea transport safety 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	<p>ENVIRONMENTAL PROTECTION:</p> <ul style="list-style-type: none"> • Inspection générale de l'environnement et du développement durable (IGEDD, General Inspectorate for the Environment and Sustainable Development) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	<p>RADIATION PROTECTION AND NUCLEAR SAFETY;</p> <ul style="list-style-type: none"> • French authority for nuclear safety (ASN) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	<p>FOOD SAFETY:</p> <ul style="list-style-type: none"> • Conseil général de l'alimentation, de l'agriculture et des espaces ruraux (CGAAER, General Council for Food, Agriculture and Rural Areas) • Agence nationale chargée de la sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES, National Agency for Food, the Environment and Occupational Health and Safety) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	<p>PUBLIC HEALTH:</p> <ul style="list-style-type: none"> • Agence nationale chargée de la sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES, National Agency for Food, the Environment and Occupational Health and Safety) • Agence nationale de santé publique (Santé publique France, SpF, French public safety agency) Haute Autorité de santé (HAS, high health authority) • Agence de la biomédecine (Agency for biomedicine) • Etablissement français du sang (EFS, French blood association) • Comité d'indemnisation des victimes des essais nucléaires (CIVEN, Committee for Compensation of Victims of Nuclear Tests) • Inspection générale des affaires sociales (IGAS, General Inspectorate of Social Affairs) Institut national de la santé et de la recherche médicale (INSERM, National Institute for Health and Medical Research) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.

FERRAGAMO FRANCE S.A.S.	<ul style="list-style-type: none"> • Conseil national de l'ordre des médecins, pour l'exercice de la profession de médecin (National Council of the Board of Physicians, for the practice of the medical profession) • Conseil national de l'ordre des masseurs-kinésithérapeutes, pour l'exercice de la profession de masseur-kinésithérapeute (National Council of the Board of Masseurs-Physiotherapists, for the practice of the profession of masseur-physiotherapist) • Conseil national de l'ordre des sages-femmes, pour l'exercice de la profession de sage-femme (National Council of the Board of Midwives, for the practice of the profession of midwife) • Conseil national de l'ordre des pharmaciens, pour l'exercice de la profession de pharmacien (National Council of the Board of Pharmacists, for the profession of the profession of pharmacist) • Conseil national de l'ordre des infirmiers, pour l'exercice de la profession d'infirmier (National Council of the Board of Nurses, for the practice of the nursing profession) • Conseil national de l'ordre des chirurgiens-dentistes, pour l'exercice de la profession de chirurgien-dentiste (National Council of the Board of Dental Surgeons, for the practice of the profession of dental surgeon) • Conseil national de l'ordre des pédicures-podologues, pour l'exercice de la profession de pédicure-podologue (National Council of the Board of Pedicure-Podiatrists, for the practice of the profession of pedicure-podiatrist) • Conseil national de l'ordre des vétérinaires, pour l'exercice de la profession de vétérinaire (National Council of the Board of Veterinarians, for the practice of the veterinary profession) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
CONSUMER PROTECTION:	<ul style="list-style-type: none"> • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF, Directorate General for Competition, Consumer Affairs and Fraud Prevention) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
PROTECTION OF PRIVACY AND PERSONAL DATA, AND SECURITY OF NETWORK AND IT SYSTEMS;	<ul style="list-style-type: none"> • Commission nationale de l'informatique et des libertés (CNIL, National Commission for Computer Information and Liberties) • Agence nationale de la sécurité des systèmes d'information (ANSSI, National agency for the safety of IT systems) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
VIOLATIONS OF THE FINANCIAL INTERESTS OF THE EUROPEAN UNION:	<ul style="list-style-type: none"> • Agence française anticorruption (AFA, French Anti-Corruption Agency), for breaches of probity 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.

FERRAGAMO FRANCE S.A.S.	<ul style="list-style-type: none"> • Direction générale des finances publiques (DGFiP, Directorate General of Public Finances), for value added tax fraud • Direction générale des douanes et droits indirects (DGDDI, Directorate General of Customs and Indirect Duties), for fraud in customs duties, anti-dumping duties and the like 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
<p>INFRINGEMENTS RELATING TO THE DOMESTIC MARKET:</p> <ul style="list-style-type: none"> • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF, Directorate General for Competition, Consumer Affairs and Fraud Prevention), for anti-trust practices • Autorité de la concurrence, pour les pratiques anticoncurrentielles (French anti-trust authority) • Direction générale des finances publiques (DGFiP, Directorate General of Public Finances), for value added tax fraud 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.	
<p>DUTIES PERFORMED BY THE MINISTRY OF DEFENSE:</p> <ul style="list-style-type: none"> • Contrôle général des armées (CGA, General Control of the Armies) • Collège des inspecteurs généraux des armées (Board of Inspectors General of the Armed Forces) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.	
<p>PUBLIC STATISTICS:</p> <ul style="list-style-type: none"> • Autorité de la statistique publique (ASP, Authority for public statistics) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.	
<p>AGRICULTURE:</p> <ul style="list-style-type: none"> • Conseil général de l'alimentation, de l'agriculture et des espaces ruraux (CGAAER, General Council for Food, Agriculture and Rural Areas) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.	
<p>NATIONAL SCHOOL SYSTEM AND HIGHER EDUCATION</p> <ul style="list-style-type: none"> • Médiateur de l'éducation nationale et de l'enseignement supérieur (National School System and Higher Education Mediator) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.	
<p>INDIVIDUAL AND COLLECTIVE LABOR RELATIONSHIPS, WORKING CONDITIONS:</p> <ul style="list-style-type: none"> • Direction générale du travail (DGT, General Directorate of Labor) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.	

FERRAGAMO FRANCE S.A.S.	EMPLOYMENT AND PROFESSIONAL TRAINING: <ul style="list-style-type: none"> Délégation générale à l'emploi et à la formation professionnelle (DGEFP, General Representation Officer for Employment and Professional Training) 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	CULTURE: <ul style="list-style-type: none"> Conseil national de l'ordre des architectes, pour l'exercice de la profession d'architecte (National Council of the Board of Architects, for the practice of the profession of architect) Conseil des maisons de vente (Council of auction houses), for public auctions 	External Reporting Channels may be accessed on the websites of the relevant Public Authorities.
	RIGHTS AND FREEDOMS IN TRANSACTIONS WITH STATE ADMINISTRATIONS, LOCAL INSTITUTIONS, PUBLIC INSTITUTIONS AND ENTITIES PERFORMING PUBLIC SERVICE DUTIES; INTERESTS AND RIGHTS OF CHILDREN; DISCRIMINATION; ETHICS OF PEOPLE ENGAGED IN SECURITY ACTIVITIES: <ul style="list-style-type: none"> Défenseur des Droits (Attorney for the defense of rights) 	The External Reporting Channels managed by Défenseur des Droits may be accessed at this link: https://www.defenseurdesdroits.fr/ . Note: external reports relating to Ferragamo France S.A.S. May also be sent directly to Défenseur des Droits, who will forward them to the most appropriate Public Authority.
	French judicial authorities	
	Institutions, bodies, offices or agencies of the European Union in charge of collecting information on breaches which fall within the scope of the aforementioned Whistleblowing Directive	
FERRAGAMO ESPAÑA S.A.	Autoridad Independiente de Protección del Informante (AAI, Independent Authority for the Protection of Whistleblowers)	The External Reporting Channels managed by AAI may be accessed at this link: https://www.defensa.gob.es/ministerio/canal-interno/ .
	Oficina Antifraude Cataluña (Catalan anti-fraud agency)	The External Reporting Channels managed by Oficina Antifraude Cataluña, with jurisdiction in Catalonia, may be accessed at this link: https://www.antifrau.cat/en/mailbox/report-corruption .
	Agencia Valenciana Antifrau (Valencia anti-fraud agency)	The External Reporting Channels managed by Agencia Valenciana Antifrau, with jurisdiction in Valencia, may be accessed at this link: https://www.antifraucv.es/cuestiones-generales/ .
FERRAGAMO DEUTSCHLAND GMBH	Externe Meldestelle Des Bundes (External reporting office of the federal government)	The External Reporting Channels managed by Externe Meldestelle Des Bundes may be accessed at this link: https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes.html .

ANNEX 3: Types of Breaches and Relevant Breaches

The following table contains a classification and illustrative description of the main types of **Breaches** that may be reported.

Anti-corruption	Any act aimed at influencing the decision-making process in breach of applicable rules (for example, by granting, requesting or accepting bribes, illegal payments, compensation, incentives or entertainment, etc.); including donations or contributions to political parties, candidates or organizations of any kind
Gifts, donations and sponsorships	Breaches of guidelines and procedures relating to the granting and acceptance of gifts, invitations, sponsorships, donations and other benefits
Environment, health and safety	Regulations on safe working conditions; breach of environmental laws, regulations, group policies or procedures relating to the management and disposal of hazardous materials or occupational health and safety regulations
Correct behavior and conflict of interest	Dishonest and incorrect relationships with suppliers, customers, competitors, or distributors in breach of Corporate policies and procedures such as: improper selection of suppliers and customers based on tangible or intangible personal benefits, incorrect negotiation or different allocation of contractual remuneration, disclosure of confidential information, disparaging statements about competitors and/or their products, etc.
Fraud and theft	Fraud, theft, fraudulent insurance claims, misuse of company assets, accounting/audit irregularities, destruction of evidence.
Human resources	Harassment, hazing, discrimination, violence in the workplace, ill-treatment of employees, threats and any other breach in the workplace of the applicable regulations or the Ferragamo Code of Ethics
Securities and capital market	Breaches of regulations governing capital markets and listed instruments. This category includes breaches of: <ul style="list-style-type: none"> • legislation applicable to the sale and purchase of listed financial instruments, committed by persons with inside information or in exposed positions • restrictions on the disclosure of sensitive information regarding the prices of financial instruments • disclosure obligations on the part of shareholders; • market manipulation or securities trading regulations, with the intent to damage a third party or Ferragamo
Other	Any other breach of the Ferragamo Code of Ethics, corporate policies or procedures and applicable legislation, which does not fall within the categories specified above

It should be noted that the protection measures referred to in Article 5 above only apply in the event of Reports, Public Disclosures and complaints concerning the following **Relevant Breaches** filed through the corresponding Reporting Channels pursuant to the Whistleblowing Decree, the French Whistleblowing Law, the Spanish Whistleblowing Law and the German Whistleblowing Law or other mandatorily applicable Foreign Whistleblowing Legislation in relation to Reports concerning a Ferragamo Group Company.

REFERENCE WHISTLEBLOWING LEGISLATION	REPORTING CHANNELS THAT MAY BE USED	RELEVANT BREACH
(ITALIAN) WHISTLEBLOWING DECREE	INTERNAL REPORTING CHANNELS	<ul style="list-style-type: none"> • <u>Predicate offenses under Legislative Decree No. 231/2001</u> • <u>Breaches of the Organizational Policy of Ferragamo</u> • <u>Breaches of the Ethics Code of Ferragamo</u> (as an integral part of its Organizational Policy)
	INTERNAL REPORTING CHANNELS	Breaches of EU legislation, namely: <ul style="list-style-type: none"> • <u>Offenses committed in breach of the EU legislation contained in Annex 1 to the Whistleblowing Decree and of all national measures transposing the same</u>, in relation to the following business sectors: public contracts; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and conformity; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and IT systems • <u>Acts or omissions affecting the EU's financial interests</u> including: fraud, corruption and any other illegal activities related to the Union's spending • <u>Acts or omissions concerning the domestic market which compromise the free movement of goods, people, services and capital</u>, including: infringements in the fields of competition and state aid, corporate tax and schemes whose purpose is obtain a tax advantage which defeats the object or purpose of applicable corporate tax legislation • <u>Acts or behavior that defeat the object or purpose of the provisions of the European Union in the business sectors specified above</u>, including: unfair commercial practices and abuse of a dominant position, adoption of so-called predatory prices, target discounts, bundled sales such as to violate the protection of free competition
	EXTERNAL REPORTING CHANNELS	
	PUBLIC DISCLOSURES	
	COMPLAINT	
FRENCH WHISTLEBLOWING LEGISLATION	INTERNAL REPORTING CHANNELS	<ul style="list-style-type: none"> • <u>Offenses, crimes, threats or damage to the public interest</u>, according to French legislation • <u>Breaches, or attempt to conceal the breach, of an international commitment duly ratified or approved by France, of a unilateral act of an international organization</u> adopted on the basis of such commitment, of European Union law, legislation or regulation • <u>Requests relating to the regulation of employment relationships or relations with superiors or colleagues, in reference to an offence, a crime, a breach of the law or a regulation</u>
	EXTERNAL REPORTING CHANNELS	
	PUBLIC DISCLOSURES	
	COMPLAINT	

SPANISH WHISTLEBLOWING LEGISLATION	INTERNAL REPORTING CHANNELS	<ul style="list-style-type: none"> • <u>Any acts or omissions that may constitute a breach under EU legislation</u>, provided they are within the scope of the European Union acts listed in Annex 1 to the Whistleblowing Decree, in relation to the following business sectors: public contracts; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and conformity; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and IT systems • <u>Actions or omissions that may constitute a serious or very serious administrative offense or misdemeanor</u>, according to Spanish law • <u>Serious or very serious administrative offenses and misdemeanors involving a financial loss for the tax authorities and social security</u> • <u>Sexual harassment in the workplace or breaches of workplace safety regulations</u>
	EXTERNAL REPORTING CHANNELS	
	PUBLIC DISCLOSURES	
	COMPLAINT	
GERMAN WHISTLEBLOWING LEGISLATION	INTERNAL REPORTING CHANNELS	<ul style="list-style-type: none"> • <u>Breaches punishable by law</u> • <u>Breaches subject to financial penalties</u>, to the extent that the violated rule protects life, limb or health or protects the rights of employees • <u>Breaches of other German or European legal provisions</u>, in relation to the following business sectors: public contracts; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and conformity; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and IT systems
	EXTERNAL REPORTING CHANNELS	
	PUBLIC DISCLOSURES	
	COMPLAINT	

ANNEX 4: Applicable Penalties and Competent Public Authorities

The following table contains a list of penalties applicable in the event of breach of the Whistleblowing Decree, the French Whistleblowing Law, the Spanish Whistleblowing Law and the German Whistleblowing Law, specifying the competent Public Authorities in charge of their imposition.

LEGISLATION WHISTLEBLOWING	PUBLIC AUTHORITY	PENALTY
(ITALIAN) WHISTLEBLOWING DECREE	Autorità Nazionale Anticorruzione (ANAC, Italian National Anti-Corruption Authority)	ANAC will impose an administrative cash penalty on the person held responsible ranging from: <ul style="list-style-type: none"> • €10,000 to €50,000 when it has assessed that retaliation has been committed; • €10,000 to €50,000 when it has assessed that the Report has been obstructed or that an attempt has been made to obstruct it; • €10,000 to €50,000 when it has assessed that the obligation of confidentiality has been breached; • €10,000 to €50,000 when it has assessed that no reporting channels have been established; • €10,000 to €50,000 when it has assessed that no procedures have been adopted for filing and managing Reports or that the adoption of such procedures does not comply with the provisions of the Whistleblowing Decree; • €10,000 to €50,000 when it has assessed that no inspection and examination of the Reports received has been carried out; • €500 to €2,500, when the civil liability of the Reporting Person for defamation or slander in cases of willful misconduct or gross negligence has been assessed, including in the first level of judgment, unless the same has already been convicted, including in the first instance, of the crimes of defamation or slander or otherwise of the same crimes committed by reporting the event to the judicial or accounting authorities.

FRENCH WHISTLEBLOWING LEGISLATION	French judicial authorities	<p>In the event of breaches, the following cash and imprisonment penalties are set forth:</p> <ul style="list-style-type: none"> • in the event of the adoption of retaliatory measures, in addition to the nullity of such retaliatory measures, the crime of discrimination will be punished with three years' imprisonment and a €45,000 fine; • in case of breach of the confidentiality obligations, a penalty of 2 years' imprisonment and a €30,000 fine will be imposed; • in the event of obstruction of a report, a penalty of 1 year imprisonment and a €15,000 fine will be imposed.
SPANISH WHISTLEBLOWING LEGISLATION	Autoridad Independiente de Protección del Informante (AAI, Independent Authority for the Protection of Whistleblowers)	<p>In the event that natural persons are held responsible for the breaches, the cash penalties to be imposed will range from:</p> <ul style="list-style-type: none"> • €1,001 to €10,000 for the commission of minor breaches; • €10,001 to €30,000 for the commission of serious breaches; • €30,001 to €300,000 for the commission of very serious breaches. <p>In the event that legal persons are held responsible for the breaches, the cash penalties to be applied will range from:</p> <ul style="list-style-type: none"> • Zero to €100,000 for minor breaches; • €100,001 to €600,000 for serious breaches; • €600,001 and €1,000,000 for very serious infringements. <p>Moreover, in the event of very serious breaches, other non-pecuniary penalties are set forth, such as:</p> <ul style="list-style-type: none"> • public warning; • prohibition to obtain subsidies or other tax benefits for a maximum period of 4 years; • prohibition to enter into contracts with the public sector for a maximum period of 3 years; or • publication of penalties for amounts equal to or greater than €600,001 in the Spanish Official Journal ("BOE").
GERMAN WHISTLEBLOWING LEGISLATION	Competent German Authority	<p>In the event of breaches, the following cash penalties are set forth:</p> <ul style="list-style-type: none"> • €20,000, in the event that the Reporting Person has disclosed incorrect information knowingly; • up to €50,000, in the event that communication between the Reporting Person and the reporting office has been intentionally obstructed; • up to €20,000, in the event that there is no intention to establish or manage an internal reporting office; • up to €50,000, in the event of retaliatory measures against the Reporting Person; • up to €50,000 in the event of willful misconduct, up to €10,000 in the event of negligence, for any willful or negligent breach of the confidentiality of the Report.

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