

DOLCE & GABBANA

| CODE OF
| ETHICS



THE CODE OF ETHICS OF THE DOLCE&GABBANA GROUP OUTLINES THE COMMITMENTS AND RESPONSIBILITIES IN CONDUCTING BUSINESS AND CORPORATE ACTIVITIES TO WHICH EVERY RECIPIENT OF THE CODE OF ETHICS MUST COMPLY WITH IN CARRYING OUT ITS WORK ACTIVITIES.

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1. INTRODUCTION

1.1 Dolce&Gabbana

Founded in 1985, the Dolce&Gabbana Group (also "the Group" or "Dolce&Gabbana") is one of the international **leaders** in the fashion and luxury sector. The Founders, Domenico Dolce and Stefano Gabbana, have always been the creative and stylistic source of all the brand's activities, as well as the main directors of the Group's growth strategy, aimed at balanced development of activities strongly consistent with the brand's identity.

The Group (consisting of D&G S.r.l. and its subsidiaries) creates, produces and directly distributes high-end clothing, leather goods, footwear, jewellery and watches, as well as, since January 1, 2023, beauty products, all of them under the Dolce&Gabbana brand. Instead, the production and distribution of eyewear lines and other lifestyle products promoted by the brand are managed through licensing partners.

The strength of the Group is based on the complementarity among the designer-entrepreneurs, the **management** and the rest of the organizational structure.

1.2 Values

Contrast and Harmony

For Dolce&Gabbana, contrast is an endless source of stimulation and inspiration. The Contrast value generates the Harmony value which is expressed in a style that combines Luxury&Street, Tradition&Research, Creativity&Tailoring, Excess&Rigour, Dream&Reality.

Respect for People

For Dolce&Gabbana, any form of discrimination and harassment must be prohibited, paying constant attention to creating and maintaining a safe, healthy and adequate working environment, in which all Employees and Co-workers are protected.

Creativity and Entrepreneurship

For Dolce&Gabbana, creativity is the essence that brings the items of clothing to life. The Creativity value ties in with the Entrepreneurship value, making it possible to create original products that express a unique style in line with market expectations.

Integrity and Business Ethics

For Dolce&Gabbana, Integrity is a fundamental value that should guide every relationship with stakeholders, whether internal or external, public or private. Integrity in conduct must be pursued to promote a corporate culture based on the value of Business Ethics.

Responsibility and Honesty

For Dolce&Gabbana, Honesty and Responsibility are fundamental values that should guide the behaviour of all people who, in contributing to the achievement of the Group's strategy, come to know or manage sensitive information, or use corporate IT tools.

Respect for the Environment and Social Development

Respect for the environment, a common resource to be protected for the benefit of future generations, and social development are values pursued by the Group through the adoption of responsible conduct and support for initiatives and projects aimed at contrasting the climate change and contributing to the evolution of the society in general.

1.3 Principles and Structure of the Code of Ethics

The Code of Ethics (or the “Code”) of Dolce&Gabbana defines the ethical principles and rules of conduct that, together with legal, regulatory and contractual ones, guide the Group's actions towards stakeholders. It provides guidelines for the daily management of activities inspired by behaviours that are correct both legally and ethically. The foundations of the Code itself underpin the organizational and control models of all the Group's activities and are one of the pillars for preventing unlawful behaviours and crimes.

The Code of Ethics is inspired by the main regulations, documents and guidelines existing at both national and international levels regarding corporate social responsibility and corporate governance, such as the United Nations Charter of Rights, the Charter of Fundamental Rights of the European Union, labor standards defined in ILO (International Labour Organization) conventions, and OECD (Organization for Economic Co-operation and Development) Guidelines for Multinational Enterprises.

The Code of Ethics sets the core Values of the Group and it is meant to be the Group's "Declaration of Principles" that impacts the policies and the main processes of the corporate organization.

The Code is thus intended as an autonomous document that complements the Model pursuant to Legislative Decree 231/2001, as it identifies, through the formalization of fundamental values, the culture the Company expresses in pursuing its mission.

The Code is inspired by values of diligence, fairness, legality, transparency, impartiality and professionalism and it encourages principles of cooperation and collaboration, aiming to preserve the integrity of Dolce&Gabbana's assets, as well as protect its image and reputation.

The following rules of conduct have been developed to explicitly state the reciprocity of rights and duties that bind the Group to its stakeholders concerning the considered topics.

The Code of Ethics is addressed to corporate bodies and their members, management, employees, collaborators, individuals acting on behalf of the Group and, in general, all those with whom Dolce&Gabbana comes into contact in the course of its activities. The recipients of the Code of Ethics are called to conduct themselves in a manner that respects the principles set out in the Code.

The Code of Ethics is brought to the attention of the recipients in the ways the Group deems most appropriate, in accordance with existing practices. Specifically, for employees and collaborators, the Code of Ethics is available on the corporate website (<https://world.dolcegabbana.com/corporate/code-of-ethics>) and on the corporate intranet. It is also explicitly referenced in the DG People Handbook provided to each employee at the time of hiring.

2. RULES OF CONDUCT

2.1 Relationships with Employees

The Dolce&Gabbana Group recognizes the value of its people and commits to creating a work environment where the following are guaranteed:

- Respect for human rights;
- Enhancement of professional skills;
- Protection of health and safety;
- Equal opportunities.

Respect for Human Rights

Dolce&Gabbana recognizes the importance of ensuring respect for human rights, particularly workers' rights, by providing its employees and collaborators with a work environment free from discrimination, abuse and harassment, as well as the right to free association and collective bargaining.

Enhancement of Professional Skills

For Dolce&Gabbana, enhancing creativity and professional skills is a fundamental goal to enable each person to contribute to the Group's strategy, expressing their potential to the fullest. This is achieved through the Group's constant focus on:

- **Training and Empowerment**
Dolce&Gabbana commits to providing continuous training, not only in the required work performance but also in a broader context of empowering its employees and collaborators to respect the rules of conduct and properly use company assets.
- **Listening and Dialogue**
Dolce&Gabbana commits to listening to, and dialoguing with, its employees and collaborators to reconcile the corporate's needs with personal and family requirements.
- **Encouraging a Sense of Belonging**
Dolce&Gabbana commits to promoting and encouraging a sense of belonging, creating an internal climate of cooperation and exchange of professional knowledge, essential for pursuing the corporate strategy.

Health and Safety Protection

Dolce&Gabbana commits to promoting the safeguarding of the health and safety of its employees, collaborators, suppliers, customers and anyone who comes into contact with the Group in every country where it operates. Dolce&Gabbana ensures healthy and safe work environments, where physical and mental integrity are protected through compliance with the highest levels of protection and prevention from accidents, as well as constant attention to improving safety conditions.

Employees and collaborators, to enable the implementation of the Group's commitments, receive adequate training on health and safety and are required to pay the utmost attention to the information they receive, as well as comply with all internal health and safety provisions.

Employees and collaborators are invited to report any dangerous behaviours, working conditions, or issues and to adopt a preventive approach that recommends the use of protective devices.

Equal Opportunities

Dolce&Gabbana commits to ensuring equal opportunities for each employee and collaborator and to preventing and avoiding any form of discrimination¹, harassment and abuse by applying merit and competence criteria at every stage of the professional relationship (selection, hiring, training and remuneration growth). To this end, employees and collaborators are encouraged to actively cooperate to maintain a work environment based on mutual respect for each other's dignity and skills. The Group also complies with labor laws, ensuring the rights provided by law and collective bargaining.

In particular, during the staff selection phase, objective criteria are adopted based on the correspondence of professional profiles to the company's needs for the specific role, in full respect of candidates' equal opportunities.

Furthermore, regarding the definition of remuneration, Dolce&Gabbana commits to offering a fair remuneration level and, compatibly with the Group's economic and financial health, a path of enhancement and professional growth reflecting each individual's experience, knowledge, and skills without discrimination.

¹ By way of example and not limited to, discrimination based on age, gender, health status and different physical or mental abilities, cultural identity, sexual orientation, religious belief, language, ethnic or national origin, personal beliefs and opinions, political opinions, union membership or activity and any other personal characteristic not related to the professional sphere.

Concerning parental leave, the Group guarantees this opportunity to all its employees in accordance with current regulations and local legislation in each country where it operates.

Employees, in turn, are required to inform the Human Resources department in advance about the existence of personal or family situations that may lead to unfair and preferential treatment.

Compliance by employees and collaborators with the principles contained in this Code of Ethics is considered an important indicator in the application of incentive and professional growth systems.

2.2 Relationships with Suppliers and Business Partners

Dolce&Gabbana considers its suppliers (especially first-tier ones) as partners with whom to build solid and lasting relationships based on mutual trust. Dolce&Gabbana's procurement processes are managed transparently and efficiently and based on the following principles:

- Transparency in selection;
- Awareness of the Code's contents;
- Fairness in relationships.

The Group commits to acting in compliance with free and fair competition for the development of high-quality products, the growth of the brand and the Group's profile in general.

Transparency in Selection

Dolce&Gabbana chooses its suppliers and business partners based on meritocratic criteria, focusing on professionalism, financial solidity, honourability and absence of conflicts of interest, while also ensuring equal opportunities for suppliers to participate in the selection process.

The selection process complies with applicable regulations and is conducted based on objective and impartial evaluations, respecting free competition, and, where necessary, verifying through documentation that suppliers have the resources, technical capabilities, experience and means to guarantee quality levels consistent with Dolce&Gabbana's requirements and image.

Each contract is free of constraints that could create dependency for either party. Compensation and sums paid to suppliers for their assignments must align with market conditions and be adequately documented.

The Group commits to including a declaration of acknowledgment and acceptance of the Group's Code of Ethics in contracts.

Awareness raising

By requiring prior review of the Code of Ethics, the Group raises awareness among its suppliers and business partners about the principles and rules of conduct outlined in the Code.

Fairness in Relationships

In managing business relationships with its suppliers and business partners, the Group commits to eliminating practices of corruption, collusive behaviors, illegitimate favors, provision of material and immaterial benefits and any other advantage intended to influence or compensate anyone who comes into contact with the Group.

2.3 Relationships with Customers

The customer is at the center of Dolce&Gabbana's strategy, which aims to meet their expectations and aspirations with high-quality products and excellent sales services. Transparency, fairness, honesty, professionalism, legality, confidentiality and impartiality distinguish every interaction with the customer.

In its relationship with the customer, the Group commits to communicating sensitively and carefully, ensuring respect for human dignity and the absence of discrimination. The Group condemns the use of communications that could in any way mislead the customer, for example, regarding the quality or origin of products, and handles information requests and complaints seriously and professionally.

Dolce&Gabbana commits to ensuring that its products meet the requirements of the markets in which they are sold, including safety, with a view to quality and continuous improvement.

Regarding the handling of confidential data, Dolce&Gabbana applies a strict policy to ensure maximum confidentiality about the identity of its customers and the exclusive garments created for them. Dolce&Gabbana and its employees and collaborators are therefore required not to use and/or disclose confidential data acquired during work activities unless authorized and in compliance with specific corporate procedures and the relevant regulatory framework. Such information may only be used for a specific, clear and legitimate purpose and retained only as long as necessary for the purpose for which it was collected.

2.4 Intra-Group Relationships

D&G S.r.l. requires all its directly or indirectly controlled companies to align with the values stated in the Code of Ethics and to comply with the laws and regulations in each country of operation.

In particular, D&G S.r.l. encourages its subsidiaries to refrain from behaviors detrimental to other Group companies and to promote the circulation of information within the Group, respecting principles of truthfulness, transparency, clarity, and completeness.

2.5 Relationships with Public Administration

Dolce&Gabbana commits to ensuring maximum integrity and transparency in relationships with supervisory and control Authorities, the Judiciary and any Public Official and Public Administration. Such relationships must adhere to principles of transparency, fairness and impartiality and should not be open to ambiguous or misleading interpretations, aiming to establish relationships of maximum collaboration. Relationships with Public Administration must comply with the provisions contained in this Code of Ethics and the specific conduct protocols indicated in the Model pursuant to Italian Legislative Decree 231/2001.

2.6 Environmental Responsibility

Dolce&Gabbana commits to seeking the most suitable solutions to balance business needs with responsible resource use, with the ultimate goal of reducing its environmental impact, particularly concerning production processes.

Employees and collaborators are encouraged to pay the utmost attention to responsible resource management (such as paper, water or energy) and to comply with waste separation regulations.

2.7 Prohibition of Money Laundering

Dolce&Gabbana condemns any activity involving the receipt, laundering and use of proceeds or goods derived from any criminal activity. In all the countries where it operates, Dolce&Gabbana commits to complying with applicable anti-money laundering and anti-criminal activity laws. Suppliers and business partners must not, in any way and under any circumstances, be involved in incidents related to money laundering from illicit or criminal activities.

2.8 Protection of Intellectual Property

Dolce&Gabbana promotes the correct use, for any purpose and in any form, of trademarks, distinctive signs, and all works of creative ingenuity, including computer programs and databases, to protect the author's property and moral rights.

2.9 Relationships with All Third Parties

The Group is particularly attentive to developing a relationship of trust with all its potential interlocutors and stakeholders, whose contribution is necessary to pursue its corporate mission.

In conducting its activities, the Group adheres to principles of loyalty and fairness, requiring all those who operate on its behalf to behave honestly, transparently and in compliance with the law in every relationship they engage in, not tolerating corrupt and/or collusive conduct or favouritism.

The management of gifts by employees of the Group's companies must be limited to the cases provided for and must not in any way give rise to even the suspicion of acting in the interest and on behalf of Dolce&Gabbana.

3. FINAL PROVISIONS

3.1 Violations and Sanctioning Consequences

Compliance with the provisions of this Code of Ethics must be considered an essential part of the contractual obligations assumed by employees and collaborators, consultants and other parties in business relationships with the Group companies. Violation of these provisions may constitute a breach of contractual obligations and may lead, depending on the case, to the application of disciplinary measures and/or sanctions or the termination of the existing employment or commercial contract.

In the specific case of employees, pursuant to and for the purposes of Article 2104 of the Civil Code, violation of the provisions of the Code of Ethics may constitute a breach of employment relationship obligations and/or disciplinary misconduct. In accordance with the procedures provided for by Article 7 of the Workers' Statute and the applicable collective bargaining, with all legal consequences, including regarding the retention of the employment relationship, such violation may result in compensation for the damages derived from it.

All employees and collaborators, if they become aware of alleged violations of this Code of Ethics or behaviours not conforming to the Group's adopted conduct rules, must promptly inform the Human Resources & Organization Department or the Supervisory Body, which will proceed to verify the validity of the alleged violations.

Non-compliance with the Code of Ethics and the principles and rules therein may also be reported through the whistleblowing system freely accessible via the corporate website at the link <https://whistleblowing.dolcegabbana.it>.

3.2 Approval of the Code of Ethics and Related Amendments

This Code of Ethics was approved by the Board of Directors of D&G S.r.l. on June 28, 2024.

Any modification and/or update to the Code must be submitted for approval to the aforementioned Board of Directors and promptly made available to the recipients.

This Code is provided to each employee at the time of hiring and made available to suppliers and business partners upon signing the respective contract.