

ZEGNA BARUFFA LANE BORGOSESIA S.P.A.

CODE OF ETHICS

TABLE OF CONTENTS

Art.	1	Introduction - Terminology	Page	1
Art.	2	Goals and values	Page	2
Art.	3	Duties of corporate officers	Page	3
Art.	4	Relationship with Customers and Suppliers	Page	4
Art.	5	Relationship with the Community	Page	4
Art.	6	Human Resources, occupational health and safety	Page	4
Art.	7	Environment	Page	5
Art.	8	Information	Page	5
Art.	9	Conflicts of interest	Page	6
Art.	10	Mass Media	Page	6
Art.	11	Compliance	Page	6

FIRST – INTRODUCTION – TERMINOLOGY

ZEGNA BARUFFA LANE BORGOSESIA SPA (hereinafter the Company) sets forth its internal and external activities in accordance with the principles contained in this Code.

For Zegna Baruffa Lane Borgosesia S.p.A. it is fundamental that all the different realities (direct suppliers, distributors, subcontractors) with which it collaborates directly and indirectly for the realisation of its products share the same principles and practices to ensure sustainable production and carry out a valuable collaboration – beyond the mere compliance with national and international regulations – in the field of workers’ rights, environment, health and safety.

In this Code, “Company” means the organisation of individuals, made up of directors, executives, officials, and any other employee or collaborator of the Company (hereinafter referred to as "corporate officers" for the sake of brevity). Every employee, collaborator, and anyone dealing with the Company must undertake to comply with the laws in force in each country where it operates, as

 <p>Zegna Baruffa Lane Borgosesia S.p.A. SPINNING TRENDS - SINCE 1850</p>	<p>ZEGNA BARUFFA LANE BORGOSESIA S.p.A.</p>	<p>Pagina 2 di 6</p> <hr/> <p>Rev. 04 CDA del 30 03 2023</p>
--	--	--

well as the provisions contained in this document and the internal regulations. This commitment must also apply to consultants, suppliers, customers, and anyone dealing with the Company. The latter will not start or continue any relationship with those who do not intend to align themselves with this principle. Not knowing the laws does not release from any responsibility. Employees and collaborators must be aware of the laws and consequent behaviour.

SECOND – GOALS AND VALUE

The primary goal of the Company is the creation of value through efficient industrial and financial strategies.

This goal must be pursued by complying with the following necessary principles of conduct:

- LEGALITY - Comply, within the company and in the relationship with the outside world, with the laws in force in the countries where the activities are carried out and the commonly accepted ethical principles established in international business standards: transparency, correctness, good faith, and loyalty;
- CORRECTNESS - Condemn any illegitimate or otherwise wrong conduct toward the community, public authorities, customers, workers, investors, and competitors, aimed at achieving their own financial goals;
- PERFORMANCE - Guarantee the highest quality of products and processes while striving exclusively the pursuit of excellence and performance, based on experience, customer service, and innovation;
- LOYALTY- Commit to promote fair competition with other players on the market and to act professionally in the company's internal relationships;
- PROFESSIONAL EXCELLENCE - Seek to pursue the values of excellence and competitiveness in the market, research, and use of technical know-how, in order to offer quality services to its customers, which answer efficiently to their needs;
- PROFESSIONAL DEVELOPMENT - Protect and develop human resources that the Company uses; accept different points of view and promote discussion, while also disagreeing with decisions from superiors, in order to make the most suitable alternative choices;

 <p>Zegna Baruffa Lane Borgosesia S.p.A. SPINNING TRENDS - SINCE 1850</p>	ZEGNA BARUFFA LANE BORGOSESIA S.p.A.	Pagina 3 di 6 Rev. 04 CDA del 30 03 2023
--	---	--

- TRANSPARENCY - Communicate in a clear, precise, and timely manner the economic results inside and outside the Company. Periodically exchange information at all levels of the organisation;
- SUSTAINABLE GROWTH - Responsibly use resources, having as a goal a sustainable long-term development; respecting the environment and the rights of future generations.

The Company is therefore committed:

- always to set as a top priority the fundamental values of ethics, legality, transparency, anti-corruption, respect for environment, people and human rights;
- to engage all its value chain in the application of current and future initiatives;
- to communicate and report all initiatives in a correct, complete and transparent way;
- to promote mindset and training on sustainability key themes amongst its workers and, as much as possible, amongst suppliers and local communities with whom the Company interacts.

THIRD - DUTIES OF CORPORATE OFFICERS

Each corporate officer, in the performance of their duties, must respect the principles of correctness, good faith, transparency, integrity, and loyalty, toward both their colleagues and third parties with whom they come into contact and must refrain from carrying out any activity or from pursuing any interests in conflict with those of the Company.

Each corporate officer must also refrain from disclosing or using for their own profit or that of third parties any news or confidential information concerning company activities; especially due to the fact that confidentiality is considered a fundamental asset of the Company in the face of its customers.

No corporate officer shall offer money, goods, services, or benefits of any kind, either on behalf of the Company or on their own behalf, to employees of individuals, companies, organisations, or bodies, or to persons used by them, in order to induce, prevent, or otherwise influence any action or fact in the interest of the Company.

No corporate officer is authorised to provide, directly or indirectly, on behalf of the Company, any funding or contribution to political parties or organisations or political or trade union candidates.

Corporate officers and other persons or entities with the objective possibility of influencing the Company's choices must absolutely avoid using, even implicitly,

 <p>Zegna Baruffa Lane Borgosesia S.p.A. SPINNING TRENDS - SINCE 1850</p>	<p>ZEGNA BARUFFA LANE BORGOSESIA S.p.A.</p>	<p>Pagina 4 di 6</p> <hr/> <p>Rev. 04 CDA del 30 03 2023</p>
--	--	--

their position to influence decisions in their favour or in favour of relatives, friends, and acquaintances for purely personal purposes, whatever their nature.

FOURTH – RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS

The Company aims to achieve high quality in the products and services offered, also thanks to customer service and the willingness to comply with requests. It should answer to the needs of customers in a timely, qualified, and competent manner; customer behaviour will be based on transparency, fairness, courtesy, and collaboration.

The Company requires all suppliers to comply with all principles of social responsibility and health and security of their workers, in particular: prohibition of forced labor, prohibition of child labor, formal employer relationship, freedom of association, fair compensation, standard working hours, non-discrimination, prohibition of mistreatment and abuse in the workplace, organisational well-being and continue improvement, worker health and safety.

FIFTH – RELATIONSHIP WITH THE COMMUNITY

The Company intends to contribute to the economic well-being and growth of the communities where it carries out its activities.

In line with these goals and with the responsibilities assumed, the Company deals with public local, national and supranational Authorities, under full and effective collaboration and transparency, with mutual autonomy, respecting financial goals and the values contained in this Code.

The Company welcomes and, where appropriate, provides support for social, cultural, and educational initiatives aimed at promoting the individual and improving their living conditions

SIXTH – HUMAN RESOURCES – OCCUPATIONAL HEALTH AND SAFETY

The Company acknowledges the importance of human resources in the belief that the main success factor of every company is the professional contribution of the people who work there, in a framework of mutual loyalty and trust. Therefore, it protects occupational health and safety and considers it is essential to comply with all national legislation aimed at protecting workers when carrying out its economic activities, besides respecting workers' rights, complying with all the national legislation set in place to protect the workers, including underage workers, having also implemented, among other things,

fundamental principles of social responsibility and ethics set forth by the International Labour Organization - ILO and by the Social Accountability 8000 standard. The management of labour relations is focused on guaranteeing equal opportunities and promoting the professional growth of all.

SEVENTH - ENVIRONMENT

Without prejudice to compliance with the applicable regulations, the Company believes in sustainable global growth in the common interest of all, through investment and business choices that are in compliance with respect for the environment and public health.

The Company tends to favour the adoption of technologies and methods of production - if operationally and economically feasible and sustainable - that reduce the environmental impact of its activities.

As far as applicable, the Supplier is required to:

- reduce the environmental impact of its own activities and those of its supply chain
- always act in compliance with international, transnational and national environmental laws,
- measure its energy consumption and related emissions to evaluate policies and projects to reduce them
- progressively eliminate chemicals that are toxic and harmful to humans and the environment from internal and/or external production processes

To this end, the Company has drawn up a 'Charter of Supply Chain Sustainability Values', a document in which the policies and values that guide the Company's activities towards the achievement of its economic, social and environmental sustainability objectives are explained, and on which the Company asks for the involvement and adherence of all its suppliers.

EIGHTH - INFORMATION

The Company is aware of the importance of correct information regarding its activities. In light of this, despite complying with the confidentiality requirements required by the management of the company, relationship transparency is considered to be a goal.

 <p>Zegna Baruffa Lane Borgosesia S.p.A. SPINNING TRENDS - SINCE 1850</p>	<p>ZEGNA BARUFFA LANE BORGOSESIA S.p.A.</p>	<p>Pagina 6 di 6</p> <hr/> <p>Rev. 04 CDA del 30 03 2023</p>
--	--	--

NINTH - CONFLICTS OF INTEREST

A conflict of interest situation arises when personal interests or activities affect the ability to operate in the full interest of the Company.

When conducting any activity, situations where the parties involved in the transactions are in conflict of interest must always be avoided.

In particular, all staff and collaborators, in the exercise of their duties, must refrain from participating in activities in which there may be a conflict of interests, even if only potential, that involves personal interests or interests of related third parties.

In the exclusive interest of the Company, staff and collaborators must guarantee neutral and impartial decisions. They must also disclose all conflicts of interest and discuss them with the company departments.

TENTH - MASS MEDIA

All relations with mass media will be managed through a special structure, which, while providing external communications, adheres to the principles of truthfulness, transparency, and clarity, ensuring that the information produced is consistent, accurate, and always compliant with company policies and programs.

Employees and collaborators must therefore abstain, except in the case of express authorisation, from issuing statements regarding the activities of the Company to news media or other mass media.

ELEVENTH - COMPLIANCE

All the corporate officers as identified above and all external collaborators and suppliers must comply with the Code. External collaborators and suppliers must strive to also make their suppliers and collaborators comply with this Code.