

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	1
Art.	3	Duties of corporate officers	Page	2
Art.	4	Relationship with Customers and Suppliers	Page	3
Art.	5	Relationship with the Community	Page	3
Art.	6	Human Resources, occupational health and safety	Page	3
Art.	7	Harassment and violence in the workplace	Page	5
Art.	8	Environment	Page	5
Art.	9	Information	Page	6
Art.	10	Conflicts of interest	Page	6
Art.	11	Mass Media	Page	6
Art.	12	Compliance	Page	6
Art.	13	Breach of the Ethic Code	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, as well as in relations with business partners, public Authorities and local communities.

In this Code, "Company" means the organisation of individuals, made up of shareholders, directors, executives, officials, and any other employee or collaborator of the Company (hereinafter referred to as "corporate officers" for the sake of brevity).

Every corporate officer must undertake to comply with the laws in force in each country where it operates, as 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 (partners). 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, abiding by sustainability regulations on reasonability criteria basis.

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, sustainability, quality 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;
- 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 as well as with the appointed external control Bodies (i.e. Board of Statutory Auditors, Supervisory Board, Audit Company, Data Protection Officer);
- SUSTAINABLE GROWTH – Responsibly use of natural, human and financial resources according to a « ESG oriented » business planning and governance, by 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 private/public 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.

By complying with the anticorruption policy enforced by the Company, to the extent of exceptions therein, 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

	ZEGNA BARUFFA LANE BORGOSESIA S.p.A.	Page 3 of 7
		Rev. 07 - Board of Directors - September 7 th 2026

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, even of a small amount, 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, 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; behaviour with customer will be based on transparency, fairness, courtesy, and collaboration with reference to mutual Organizational Model 231 and sustainability, safety and security law.

The Company requires all suppliers and partners, as adherence to our Model 231 and ESG policy, 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, workers health and safety, privacy.

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 adhering to the following principles, which also the Company's partners are requested to.

- **Prohibition of Forced Labor:** The Supplier shall ensure that all workers have free choice of employment. All forms of forced labor and slavery are strictly prohibited. Workers shall not be subjected to degrading treatment, corporal punishment, and mental and/or physical coercion.



- **Prohibition of Child Labor:** The use of child labor is strictly prohibited for all suppliers. Child labor is defined as work performed by children under the minimum age (14, 15 or 16) established for the various types of activities by national law in accordance with international law and, in any case, work likely to compromise the education and full development of the child.
- **Formal Employment Relationship:** The relationship between the employer and the employee must be formalized by means of a contract drawn up in writing, which includes the rights and duties of the employee and defines the terms for the transfer of the contract.
Under no circumstances may workers be required to pay any amount or leave a deposit in order to be hired. Foreign workers shall be employed in accordance with the immigration and labor laws of the country in which they work.
- **Freedom of Association:** The Supplier shall ensure that workers have the right to collective bargaining, to establish or join a union of their choice, without penalty, discrimination or abuse from the employer.
- **Worker Health and Safety:** The Supplier shall ensure that all workers operate in a safe and healthy work environment in compliance with applicable laws. The Supplier shall implement appropriate measures to prevent accidents and injury to health arising out of, related to, or occurring in the course of work by reducing, to the extent reasonably practicable, the causes of hazards inherent in the work environment in order to prevent and manage accidents and injury to health. The same precautions apply to suppliers who provide lodging to employees, in accordance with all applicable rules and regulations.
- **Fair Compensation:** The Supplier shall provide all workers with a defined minimum wage based on national legal standards or industry benchmark standards, as applicable, as well as respect for the right to appropriate remuneration sufficient to meet the basic needs of workers and their families and, where appropriate, to recognize an additional portion of remuneration.
- **Standard Working Hours:** The Company complies with national laws and industry standards on working hours, off days and vacations. The number of worked hours shall in no way exceed the limits provided for by these regulations and by the sector Collective Bargaining, also as defined by the International Labour Organisation (ILO).
- **Non-Discrimination:** The Supplier shall treat all workers fairly and shall not discriminate against any employee - including but not limited to compensation, hiring, access to training, promotion, termination or retirement - based on gender, race, caste, national origin, religion, age, disability, marital status, sexual orientation, union membership or political party affiliation.
- **Prohibition of Mistreatment and Abuse in the Workplace:** The Supplier shall ensure that all workers are treated with respect and dignity. No physical, mental, verbal or sexual abuse, corporal punishment or other forms of intimidation shall be used against workers.
- **Organizational Well-Being and Continuous Improvement:** The Supplier should evaluate more agile forms of work, applying methods that improve the organization of work, its reconciliation with private life and the reduction of travel. It should also evaluate new working models to increase productivity and improve worker well-being.

In accordance with the protection objectives referred-to-in above, the Company shares its Charter of Values to Suppliers, requesting those to adhere to, also for the prevention of offences pursuant to Model 231.

	ZEGNA BARUFFA LANE BORGOSESIA S.p.A.	Page 5 of 7
		Rev. 07 - Board of Directors - September 7 th 2026

SEVENTH - HARASSMENT AND VIOLENCE IN THE WORKPLACE

The Company endorses the European Social Partners' Agreement of April 26th 2007 "Framework Agreement on Harassment and Violence at Work" (hereinafter « ESPA »). Harassment and violence are caused by unacceptable behaviour by one or more individuals and can occur in different ways, some of which are more easily identified than others. The working environment can influence people's exposure to harassment and violence.

Under the ESPA of April 26th 2007:

- o harassment arises when one or more individuals are repeatedly and deliberately subjected to abuse, threats and/or humiliation in the workplace;
- o violence involves one or more individuals being assaulted in a workplace context;
- o harassment and violence may be perpetrated by one or more managers, or by one or more employees, with the aim or effect of violating a person's dignity, harming their health and/or creating a hostile working environment.

According to ESPA, the Company therefore states that:

- o any act or behaviour constituting harassment or violence in the workplace, as defined in the Agreement, is unacceptable;
- o it is therefore recognised that workers' dignity must be protected by preventing acts or behaviour constituting harassment or violence;
- o any harassment or violence suffered in the workplace must be reported;
- o workers must cooperate to a dignified working environment in which interpersonal relationships, based on equality and mutual respect principles, are fostered.

The Company is therefore committed to preventing, identifying and managing cases of harassment and violence in the workplace, by taking appropriate measures against those responsible for such misconduct.

EIGHTH - 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. At this purpose, the Company is committed to:

- o always act in compliance with international, transnational and national environmental laws, obtaining the permits required by the legislation in force (e.g. authorization to emissions into the atmosphere, authorization to discharge, etc.) and applying the appropriate waste management practices.
- o measure its energy consumption and related emissions in order to evaluate policies and projects to reduce them, in accordance with the common commitment to fight climate change and reduce its environmental impact.
- o progressively eliminate toxic and harmful chemicals for man and the environment from production processes (internal and/or external), through the application of a risk assessment and management system in line with the ZDHC program.

Therefore, in adherence to sustainability principles, the Supplier is required to:

- o reduce the environmental impact of its own activities and those of its supply chain;

	ZEGNA BARUFFA LANE BORGOSESIA S.p.A.	Page 6 of 7
		Rev. 07 - Board of Directors - September 7 th 2026

- 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.

In accordance with the Charter of Values, Model 231 and the principles of sustainability dealt-with-under the relevant regulation, the Suppliers are required to comply with environmental law.

NINTH - 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.

TENTH - 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, the company officers and external control Bodies 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, the company officers must guarantee neutral and impartial decisions. They must also disclose all conflicts of interest and discuss them with the company departments.

Specifically, the Directors are also subject to relevant rules provided for in Article 2391 of the Italian Civil Code thereto.

ELEVENTH - 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, unless authorized, from stating about the Company's activities to mass media as well as on personal or company social-media profiles.

TWELVETH - COMPLIANCE

All the corporate officers, the external control Bodies and all 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.

The Model 231 principles, policies and related documentation are also shared with Clients in the wake of a broader synergy to comply to sustainability criteria.

THIRTEENTH – BREACH OF THE ETHIC CODE

The Company hereby assumes the Code of Ethics as a pivotal ground of their business operations as well as interpersonal and commercial relations.

	ZEGNA BARUFFA LANE BORGOSESIA S.p.A.	Page 7 of 7
		Rev. 07 - Board of Directors - September 7 th 2026

In order to safeguard the values therein, the Company set-up a whistleblowing platform to allow Employees and Stakeholders (such as Customers, Suppliers, Outsourcers, Shareholders, etc...) reporting, also anonymously, about relevant alleged infringements.

It is worth to mention that filed reports should be based on concretely verifiable circumstances, hence appropriate legal actions shall be taken against those whose report is untruthful or aimed at harming third parties or the Company reputation.

In full compliance with the provisions of Legislative Decree 24/2023 (notably, the Italian Law which transposed UE-Directive n. 2019/1937), the Whistleblower shall be provided by the Company for protection from retaliation or discrimination, by ensuring the reporting confidentiality, unless otherwise laid-down by law.

For further information, please refer to the whistleblowing procedure posted on the Company's website.