



## **GROUP ANTI-CORRUPTION POLICY**

*approved by the Board of Directors of Moncler S.p.A. held on October 24th, 2017 (and then by all Moncler Subsidiaries)  
later approved by the Board of Directors of Sportswear Company S.p.A. held on July 22nd, 2021 (and then by all SPW Subsidiaries)*

We, in Moncler Group, believe that not only is important to reach our results but, even more so, we value the way these results have been reached.

The **Board of Directors** and the **Management Team of Moncler Group** are, therefore, highly committed in carrying out **fair, honest and ethical business**, in compliance with the applicable laws and local regulations **worldwide**.

We all know this is the only possible way to conduct business, and I am convinced that business ethical conduct will further contribute to enhance the **brand value**, strengthen **customers' loyalty** and reinforce our **competitive position**.

**Moncler Anti-Corruption Policy** should represent for all of us a **helpful tool and a guide to carry out our daily activities in an ethical manner**, ensuring value creation and protecting our deep beliefs.

**I count on all of you** to support actively the implementation of this Policy and to adhere to its principles.

**Remo Ruffini**  
**Chairman**

## **Group provisions and guidelines**

Moncler Group believes that *"it is an essential duty of anyone to treat colleagues, associates and all those the Company serve in the course of doing business with the highest levels of **honesty, integrity, consideration and respect**".*

The aim of this policy is providing specific rules for preventing, detecting and managing corruption risks, in the belief that ethic is the premise for the success of company's business.

### General Principles Definition

- A **task / activity** cannot be entirely done by a unique person
- Respecting Group **Delegation of Authority**
- Guaranteeing **Formalization and Traceability**
- Complying with **Policies and Procedures**
- Granting **Accuracy, Correctness and Completeness** of Accounting Records

*Please refer to Section 2 for details*

### Group Areas potentially exposed to Corruption Risk



*Please refer to Section 3 for details*

## **Local commitment**

Group and Local Functions shall effectively design, **implement the provisions contained in the Group Anti-corruption Policy and consistently adequate local operating procedures**, addressing sensitive areas identified at Group level as well as those specifically relevant at Local level, and the related relevant controls in order **to effectively reduce corruption risks**.



### **Comprehension**

- **Understanding Group provisions and guidelines** regarding business conduct, ethical values **and controls to reduce corruption risks**
- Analyzing local context and **identifying specific Areas at Risk** to be considered and addressed



### **Design**

- **Implement the provisions contained in the Group Anti-corruption Policy and consistently adequate local operating procedures**, addressing all sensitive Group and local areas, general principles and relevant controls
- **Spreading Policy provisions and guidelines** within the local organization



### **Implementation**

- **Monitoring** business and regulatory requirements **changes** relating to corruption risks **providing on-time information** to the Group
- **Reporting behaviors at risk** of violating laws or Group principles **through** the dedicated **Whistleblowing channels**

*Please refer to Section 4 for details*

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## Why a Group Anti-Corruption Policy

Moncler Group is an **international organization** that operates in various institutional, economic, political, social and cultural settings which are continuously and rapidly evolving. Global presence leads to **great challenges** and **key responsibilities**. The ability to abide by all applicable laws, regulations and social responsibilities is one of them, given the **multitude of jurisdictions** in which the Group operates<sup>1</sup>.

Current trends show that regulatory and social environments around the world are more and more focused on specific anti-corruption legislations. This evolution is aimed at strengthening **the fight against corruption, to avoid both ethical and business damages**. From an ethical point of view, corruption harms the integrity of all those involved and undermines the basic values of the organizations to which they belong. From a business point of view, corruption leads to sub-optimal outcomes for companies such as legal risks, reputation disruption and financial costs, including fines.

## A definition of Corruption

Corruption can be **defined as payments and provision of any other thing of value** to empowered persons - either in the private or public sector - **to ensure an illicit advantage for the Group or a personal benefit which can damage the Group's image**.

**Corruption** definition includes both **(i)** offering, promising, giving, paying - or authorizing somebody to offer, promise, give or pay -, directly or indirectly, an economic advantage or any other benefit in favor of public or private parties - **"Active Bribery"** and **(ii)** accepting a request or solicitation - or authorizing someone to accept a request or solicitation - concerning an economic advantage or any other benefit from public or private parties - **"Passive Bribery"**.

## Anti-Corruption Policy Purpose

The provisions and guidelines contained in this **Policy** are inspired by company culture and the behavioral principles set out in Moncler's Code of Ethics and have been developed analyzing the potential activities that can expose the Group to the risk of corruption. **They promote the highest standards** in all of our business dealings, conducting activities with loyalty, fairness, transparency, honesty and integrity and **provide specific rules for preventing, detecting and managing corruption risks** within the Group's influence.

## Anti-Corruption Policy Recipients

**Officers, members of any committee** of the Group's companies, **directors, managers, employees, business partners**, entities working as **suppliers** and **consultants, eventual agents** and anyone acting on behalf of the Group **are required** to be honest, transparent, loyal and professional in their business conducts, wherever they operate, in order **to act in strict compliance with applicable laws and regulations**.

<sup>1</sup> Among others, main conventions and laws to refer to are: (i) OECD Recommendation for Further Combating Bribery of Foreign Public Officials in International Business Transactions; (ii) United Nations Convention against Corruption (UNCAC).

Moncler Group requires its people to operate in **compliance with applicable anti-corruption laws and regulations** and be aware of the **Group values, standards and principles**. Moncler firmly believes that acting in accordance with **principles detailed in the Code of Ethics**, in this Policy as well as in the laws and regulations will prevent cases of corruption and will contribute to **protect the ethical and responsible business conduct**.

**Moncler's Code of Ethics** states that *"In the course of their activities, both in Italy and abroad, the Addressees shall apply the principles of the Code of Ethics and shall abide by principles of fairness, correctness and transparency in the aim to preserve the equity of Moncler Group and to safeguard its respectability and its perception whilst respecting any legislation in force and maintaining clear relationships with shareholders and stakeholders"*.

In dealing with third parties *"are prohibited gifts, benefits and acts of kindness and hospitality unless their nature and value could not be interpreted as aimed at obtaining favorable treatment and, in any case, do not compromise the Company's image"*.

With regard to relations with Public Administration, *"the Addressees shall refrain from offering, directly or through a third party, money or other benefits to any public officer, to members of his/her family or to any other person in any way connected to him/her or seeking and maintaining any personal relationship to favor, influence, interfere which has the scope of directly or indirectly conditioning his/her activity"*.

### **Activities you should avoid**

- **Active and Passive Bribery - Moncler forbids** both **"Active Bribery"** and **"Passive Bribery"**, when such activities are aimed at inducing, influencing and compensating any unlawful activity both **to favor Moncler** and **to gain personal advantages in a way that can damage the Group's image**.
- **Facilitation Payments - Moncler forbids facilitation payments** - payments in favor of Public Officials, in Italy and abroad, aimed at expediting, supporting or securing the realization of a routine activity.

### **General Principles**

As general principles, in order to prevent and monitor breaches in applicable anti-corruption laws and regulations **Moncler** requires its **people** involved in Group's business daily activities, whenever possible and applicable, to:

- **avoid to assign the responsibility of completing one task/activity to a unique process owner (Segregation of Duties principle);**
- **respect the Group Delegation of Authority;**
- **guarantee the formalization and traceability of the decision making process;**
- **comply with applicable policies and procedures in place;**
- **guarantee accuracy, correctness and completeness of accounting records of each business transaction.**



The following areas have been evaluated as potentially exposed to corruption risks through a risk identification and assessment activity and identified with the involvement of the Group Executives, based on Group activities as well as international best practices<sup>2</sup>.

- 1. Relationships with Public Institutions Representatives.**
- 2. Relationships with Suppliers, Professionals and Consultants.**
- 3. Relationships with Agents and Intermediaries.**
- 4. Relationships with Business Partners of Joint Ventures and Executives.**
- 5. Managing Donations, Sponsorships, Entertainment Expenses, Gift and Gratuities.**
- 6. Managing Human Resources.**

<sup>2</sup> International best practices arise from:

- *United Nations Global Compact*: a strategic policy initiative for businesses that are committed to aligning their operations and strategies with 10 universally accepted principles in the areas of human rights, labor, environment and anti-corruption;
- *Organization of Economic Co-operation and Development (OECD)*: the organization promoting policies that improve the economic and social well-being of people around the world;
- *Transparency International (TI)*: the global civil society organization leading the fight against corruption. It is responsible for calculating country indexes quantifying corruption risks around the world.



Moncler Group interacts with different **Public Institutions Representatives** in/for:

- **Obtaining authorizations, licenses and permits** related to: new Directly Operated Stores (DOS) opening and DOS restructuring and maintenance, set up of new Subsidiaries and the organization of fashion shows and corporate events.
- **Inspections and requests for information** by Public Authorities and Customs: verifying headquarters, subsidiaries, offices, stores, showrooms, warehouses and product compliance with applicable laws and regulations (e.g. import/export duties and trade compliance).
- **Public subsidies**: Moncler receives public contributions and financial support for activities such as employees training. Moreover, the Group interacts with public entities in order to receives public funding and contribute, operating its business, to the local economic development.
- Managing all other **fulfillments of Public Authorities' requirements** (e.g. Consob).

#### **Related Corruption Risks**

Giving or promising money or anything of value to Public Officials in order to:

- **Obtain false licenses and authorizations**, or speed up the process or avoiding new opening stores verifications.
- **Bias** inspection outcomes or avoiding an inspection or causing the omission of possible irregularities.
- **Obtain undeserved / higher public subsidies** for eligible activities and **favor Moncler** influencing representatives in charge of the decisional process.

#### **Guiding principles and main controls**

- All relations with Public Institution Representatives shall be based on the **correctness and traceability** of the behaviors and are exclusively reserved for the **competent functions, officers and managers**.
- Everyone shall respect all **laws and procedures** the Group has to comply with, in order to operate in a lawful manner.
- Any kind of action aimed at **undermining** public institutions representatives' **integrity or reputation are not tolerated**.
- All the relationships with public institutions representatives shall be managed by duly **appointed individuals** within the Group, which should operate **according to established procedures**, ensuring **traceability** and correct archiving of the related **documentation**.
- Whenever possible and applicable, **contact with public institutions** representatives shall be undertaken, in the main phases of the negotiation or proceedings, by **at least two people**.
- **Remuneration of local architects, external collaborators, real estate and customs brokers and any third party** acting on behalf or in the interests of the Group, who manage relationship with public institutions representatives should **reflect services** effectively rendered and **aligned to the fair market value**.
- In case of any **inspection or request for information** by Public Authorities, **Worldwide Legal & Corporate Affairs Function should be promptly informed**. Inspection outcomes should be communicated to Corporate level.

Moncler Group engages in relationships with suppliers to source necessary products and services to carry out its business activities.

All relevant procurements are **budgeted and managed at Corporate level** (e.g. procurement activities related to marketing and communications, style and design, DOS opening and DOS restructuring / maintenance, IT, logistics, production, raw materials), which negotiate and set procurement guidelines (quantity, price and supplier mix).

Moreover, Moncler Group engages professionals (e.g. external accountants, architects) and consultants (e.g. for communication, style, IT, tax, etc.).

Relationship with suppliers related to **other local specific procurement needs**, are **managed by Local Functions**.

### **Related Corruption Risks**

- Providing, promising or accepting a request of **money, gifts or other benefits** to/from suppliers to obtain **favorable conditions** to Moncler both at Corporate and Local level.
- Using compensation as a means to **create illicit funds** for the purpose of corruption.
- Conducting **activities at risk** with third parties, in particular through suppliers and external consultants.

### **Guiding principles and main controls (1/2)**

- The relationships with suppliers shall be managed in accordance with **policies and procedures** in place.
- The **Segregation of Duties** principle shall be granted in all phases of the procurement process. If having more than one person required to complete a task/activity is not applicable due to the Local organizational structure, the existence of compensating controls should be granted.
- A **due diligence or ethical screening of strategic professionals (external accountants) and strategic suppliers (e.g. for logistics, facons)** shall be conducted to identify possible counterparty risks. Moncler should enter into business relationships only with suppliers that have a **respectable reputation**, which are **engaged** exclusively **in lawful activities, inspired by ethical principles** comparable to those of the Group.
- **All relationships**, including related **economic terms and conditions** (e.g. over commissions, bonuses) shall be **formalized** in a written and traceable manner and signed by people with adequate **Powers of Attorney**.
- Any supplier that have business relationship with the Group, is required to sign **specific contractual clauses** disciplining the respect and acceptance of the **Anti-Corruption Policy** and the other provisions contained in the **Code of Ethics** and in the **Code of Conducts for Suppliers**, establishing this latter mandatory standards relating to: Labor and Human Rights, Health and Safety, Environment, Animal Health and Welfare, Safety and Quality of goods and services and Business Ethics.

**Guiding principles and main controls (2/2)**

- Traceability of **goods and services receiving and acceptance** should be ensured by Functions involved in purchasing processes (e.g. goods receiving documentation and recording, reporting documentation on services provided to the Company).
- **All payments** shall be made in accordance with **agreement/contract provisions** and **upon receipt of proper invoices**, correctly approved according to the **Delegation of Authority** and appropriately recorded.
- Cash payments<sup>3</sup> and payments with corporate credit card<sup>4</sup> to suppliers are **not allowed**.
- A **monitoring process** of suppliers performance and behaviors shall be ensured and anomalies correctly reported and investigated.

<sup>3</sup> Except for the management of "petty cash".

<sup>4</sup> Except for travel expenses.

For specific markets the Group can engage **agents** to manage relationships with Wholesale Customers and to carry out day-by-day business activities. **Agents represent the Group and act on its behalf.**

For specific markets the Group can engage **distributors**, whom are appointed for the exclusive sale and distribution of the products for certain markets.

According to its strategy, the Group sources potential locations and stores worldwide. Moncler Group manages relationships with **local intermediaries and real estate brokers** in order to execute pre-screenings of new stores locations. Also operations for importing products are executed by **local customs brokers**.

#### **Related Corruption Risks**

- **Performing** - by agents and intermediaries - **actions** that can be deemed as **non-complying with laws and regulations**.
- **Carrying out** - by agents and intermediaries - any **activity, or providing, promising or accepting a request of money, gifts or other benefits** in order to obtain licenses, permits or specific locations **exposing indirectly Moncler to corruption risks** which could potentially damage the Group's reputation.
- **Conducting** - by agents and intermediaries - **activities at risk with third parties** or activities which can serve for the purpose of **creating illicit funds** to be used for corruption.

#### **Guiding principles and main controls**

- **Agents, distributors and intermediaries** shall **abide by the present content of this Policy**, the standards and behavioral principles set out in Moncler Code of Ethics.
- **Agents, distributors and intermediaries** shall **operate in compliance with all local laws in the country** in which they operate, acting with **integrity, honesty and transparency**.
- A **due diligence or ethical screening of agent and intermediary** shall be conducted to identify possible counterparty risks. Moncler should enter into business relationships only with agent and intermediaries that have a **respectable reputation**, which are **engaged exclusively in lawful activities, inspired by ethical principles** comparable to those of the Group.
- The **relationships** with agents and intermediaries shall be **transparent, fair and regulated by a formal written agreement to be signed by people with adequate Powers of Attorney**.
- The **remuneration scheme** shall be **adequate, fair and aligned** to market value.
- **Business activities performed by agents, distributors and intermediaries** on Moncler behalf **shall be traceable** (e.g. reporting on agents' sales performance; formalization of negotiation phases carried out by local intermediaries and real estate brokers).
- Everyone shall monitor and **report any action performed by an agent, distributor or by an intermediary that can be classified as unlawful** or that does not comply with Moncler's internal rules of conduct.

In some countries, Moncler Group pursues **growth through Joint Ventures** in order to enter in new markets, open new stores and establish its presence globally. In this context, **the Group builds relationships with foreign Business Partners**, who are in charge to manage the business jointly with Moncler.

**Moncler Group oversees operations** in the regions where the brand is present, **with local organizations** (Subsidiaries) which autonomously operate their business, supervised and coordinated by Moncler Headquarter.

#### **Related Corruption Risks**

- **Providing, promising or accepting a request of money, gifts or other benefits** to/from potential Business Partners and Executives in order to speed up the transaction processes favoring Moncler.
- **Conducting activities at risk with third parties** or activities which can serve for **creating illicit funds** to be used for corruption, in particular **in case the activities are performed by Business Partners and Executives**.

#### **Guiding principles and main controls**

- Moncler Group ensures that all **Business Partners and Executives are managed in compliance with the statements set out in this Policy and abide by the Group's behavioral conduct and ethical values**.
- **Business Partners and Executives** who manage the business locally **shall act in compliance with integrity, professional ethics, honesty and transparency**.
- A **due diligence or ethical screening of Business Partners and Executives** shall be conducted to identify possible counterparty risks. Moncler should enter into business relationships only with Business Partners and Executives that have a **respectable reputation**, which are **engaged exclusively in lawful activities, inspired by ethical principles** comparable to those of the Group.
- All operations shall be regulated by a **formal agreement** including reasonable and **adequate compensations and compliance provisions** to be signed by people with adequate Powers of Attorney.

Moncler Group engages in **sponsorship activities** to promote its products to potential client segments and organizes **fashion shows** and **corporate events** sustaining entertainment expenses.

Moreover, **donations, gifts and gratuities** are done and intended as a **form of common courtesy and community commitment**.

#### **Related Corruption Risks**

- **Providing, promising or accepting a request of money or other benefits** through gifts, gratuities, donations, sponsorships, hospitality and entertainment expenses, **not compliant with local laws and common practices**, in order **to obtain undue advantages** for Moncler's business **or influence the independence of judgment and actions of any counterparty**.
- Using Gifts, Donations and Sponsorships as a means for **creating illicit funds** for corruption purposes.

#### **Guiding principles and main controls**

- Donations, sponsorships, entertainment expenses, gifts and gratuities **done with a specific intent to influence a particular third parties' act are not allowed**.
- A **due diligence or ethical screening of "non institutional" recipients for donations** (e.g. charity organizations) **and for sponsorships** shall be conducted to identify possible counterparty risks. Moncler should enter into relationships only with counterparty that have a **respectable reputation**, which are **engaged exclusively in lawful activities, inspired by ethical principles** comparable to those of the Group.
- All offered and accepted **gifts** shall be other than cash payment, reasonable and bona fide, compliant with applicable local laws and regulations. Any gifts provided shall be **recorded in a traceable manner**, specifying the related recipient (concerning gifts of clothing, they should be recorded in the system).
- Each subsidiary shall annually define and monitor a **budget for donations, sponsorships, entertainment expenses, gifts and gratuities**.
- All **sponsorships, donations and hospitality activities** shall be **formalized in written form** and **approved by Worldwide Marketing and Communication Department**. All payments shall be made as stated in the agreement/contract and correctly recorded.
- All **entertainment expenses** shall be **approved in accordance with Delegation of Authority**, correctly recorded and the related supporting documentation shall be complete, correct and appropriately filled.
- **Rebates shall be applied only to the VIP list** approved at Corporate level and, anyway, authorized by Worldwide Marketing & Communication Director, with **respect to applicable policies and procedures**.

Moncler Group invests great energy in selecting the **best talent and their professional development**, offering a secure, meritocratic and stimulating working environment where diversity is valued and each person has the opportunity to fully express their skills, potential and talent.

Moncler's **remuneration and benefits system is designed is based on principles of fairness, equal opportunities and meritocracy.**

#### **Related Corruption Risks**

**Providing, promising or accepting a request of money or other benefits in the form of hiring, career advancements, bonuses and MBOs recognition** to public official's or to any other third parties' close relatives in order to obtain undue advantages for Moncler.

#### **Guiding principles and main controls**

- Personnel recruitment process should be initiate in accordance to **effective needs**. Any extra-budget hiring should be formally authorized in accordance with Delegation of Authority.
- **Decisions** concerning recruitment, selection processes, career advancement and performance bonuses **shall be based on** objective and unbiased factors such as **performance evaluation and technical professional competences**.
- **Multiple functions / managers / directors** shall be **involved during selection, hiring and evaluation** processes.
- All the processes shall be **traceable**, the decisions **formalized** and the **documentation complete and correct**.
- **Checks on previous professional experience** and on suitability for the role shall be always granted and the presence of any potential **conflicts of interest** or relations with public institutions representatives, suppliers and other relevant public or private parties shall be highlighted and considered.
- **Checks on personal criminal records** on people to hire shall be conducted whenever relevant, according to the responsibility, role and powers to assume and if allowed by local Law.
- All **employment relationships** shall be **formalized in written form** to be signed by people with adequate Powers of Attorney.
- Performance bonuses, targets and other incentivizing **elements of remuneration shall be always authorized in accordance with the Delegation of Authority** and reviewed periodically to verify that there are reasonable safeguards in place to prevent resources from encouraging bribery.
- Bookings for **business trip's accommodations are managed through a Travel Agency** with wide market reputation.
- **Types of reimbursable expenses and related value limits are defined in policies and procedures** which all employee shall respect.
- **Expenses' request for reimbursement** shall be formal **authorized** in accordance with Delegation of Authority.
- **Advance payments** to employees and cash payments for business travel **should be authorized in accordance with limits and procedures** defined by the Group.



Moncler Group defines the **anti-corruption compliance processes** and the **related roles and responsibilities** to facilitate the Group to abide by anti-corruption laws and regulations. The Anti-Corruption Governance System is based on the following:

#### **SET-UP AND TRAINING**

1. **Monitoring of change in business activities and regulatory requirements**
2. **Bribery risk identification and assessment**
3. **Policy design and update**
4. **Communication and Training**

#### **MONITORING AND REPORTING**

5. **Non-compliance notifications - Whistleblowing**
6. **Audit activities**
7. **Reporting**
8. **Disciplinary measures**

#### **UPDATING**

9. **Group Anti-Corruption Policy Update and Approval**

While anti-corruption is Moncler responsibility, the Anti-Corruption Governance System is the primary **responsibility owned by the Worldwide Compliance Function in coordination with the Internal Audit Department.**

#### **4.1 Monitoring of change in business activities and regulatory requirements**

Moncler Group is eager to comply with laws and regulations of each country in which we operate. For this purpose, it is essential to perform a periodic monitoring of applicable requirements to comply with anti-corruption laws.

**Presidents of Regions** and **Local Head of Functions**, in coordination with **Worldwide Compliance Function** and with local legal support, are in charge of monitoring applicable anti-corruption requirements and changes in local legislation. In case of changes in local legislation, the **Anti-Corruption Governance System will then be reviewed** to evaluate its compliance and effectiveness and the **corrective actions defined**.

#### **4.2 Bribery risk identification and assessment**

The **WW Compliance Function, in cooperation with Internal Audit Function and other Group and Local Functions**, are in charge of **risk identification and assessment** to be carried out on a periodic basis. Activities within this area are aimed at **identifying the Group's areas of exposure to bribery risks**, considering Moncler business, social environment and third parties, as well as **evaluating the suitability and effectiveness of the existing controls**.

#### **4.3 Policy and Procedures implementing and update**

**Group and Local Functions** shall **effectively implement**, eventually with the assistance of WW Compliance Function and Internal Audit Dept., the provisions contained in the **Group Anti-corruption Policy**.

It is important that all local documents (e.g. operating procedures) are compliant with external requirements and also consistent with Anti-Corruption Policy and other Company procedures.

Local Management shall communicate to WW Compliance Function any specific needs to formalize/update appropriate rules and local controls.

#### **4.4 Communication and Training**

Communication and training activities are necessary for an effective Anti-Corruption Program implementation and to ensure that everyone is fully aware of the Anti-Corruption Policy. For this purpose, on a regular basis Moncler develops **training, awareness material and activities at Group level** enhancing the understanding and continuous update of Anti-Corruption requirements, risks and expected behaviors. At **Local level** training and awareness **activities** will be developed coherently with Group initiatives to meet specific needs and requirements.

The **WW Group Compliance Function** shall **assist** other Group Functions **in development and review of training material**, in coordination with the Human Resources Function.

**Everyone is required to attend** the above mentioned training activities, to peruse the relevant documentation and to give evidence of such activities.

#### **4.5 Non-Compliance Notifications - Whistleblowing System**

Moncler Group is eager to be aware of any potential misconduct which might lead to anti-corruption breaches. Should anyone has reasonable belief that a behavior might be at risk of violating the law or the Group principles, **he / she should promptly report the issue through the available whistleblowing system**. *(Please refer to the “Whistleblowing Procedure” for further details)*

**Moncler Group encourages employees to communicate any concerns about wrongdoing and malpractices** to their Managers first or directly to the Internal Audit Director as “Designated Officer”. The WW Compliance Function shall be involved in **technical analysis aimed at understanding and investigating non-Compliance issues reported**.

#### **4.6 Audit Activities**

The WW Compliance Function, in coordination with the Internal Audit Function, conducts periodic auditing activities to **verify (i) compliance with Group guidelines (ii) whether measures to prevent corruption risks** are adequately designed and work effectively **(iii) non-compliance notifications received**.

#### **4.7 Reporting to Top Management**

**Group Heads of Functions shall immediately inform the WW Compliance Function of significant risks, changes in applicable laws and regulations and non compliance issues**.

**WW Compliance Function shall provide the Top Management and the Risk Control and Sustainability Committee** with the **results of** activities related to **the Anti-Corruption Program implementation** - whistleblowing, auditing activities, proposed corrective actions, status of training activities and periodic reviews and updates to the documents.

#### **4.8 Disciplinary Measures**

**Moncler people are all required to comply with the principles contained in this Policy. Any violation** of the Group’s Anti-Corruption Policy constitutes a breach of the Group’s values, and might **lead to disciplinary actions evaluated**, on a case by case basis, **by the WW Human Resources Function**, and, when appropriate, supported by WW Compliance and Legal & Corporate Affairs Functions.

#### **4.9 Group Anti-Corruption Policy Update and Approval**

The Group Anti-Corruption Policy is **updated by WW Compliance Function**, with the support of other **Group Functions**, and **approved by Board of Directors**.




### SPREAD THE WORD

**Be the first example** for colleagues in carrying out day-to-day activities. Help the Group to **spread a sensitive anti-corruption culture** ensuring everyone is conscious about potential anti-corruption risk situations so that we can effectively tackle issues as a team.

### PLEASE SPEAK UP

**When suspecting someone is behaving illegally or unethically** please speak up.

The following **speaking up channels** have been put in place by Moncler:

-  **Your Line Manager**, who will notify the matter to the Internal Audit Director through email ([whistleblowing@moncler.com](mailto:whistleblowing@moncler.com)) ;
-  **Website form** available on the Corporate web page ([www.monclergroup.com/it/governance/whistleblowing](http://www.monclergroup.com/it/governance/whistleblowing));
-  **Letter** to the following address:

*Whistleblowing Moncler Group  
c/o Moncler S.p.A. - Internal Audit Director  
Via Solari 33  
20144 MILANO – ITALY*

### ASK FOR ADVICE

This Policy does not address every situation you may encounter in day-to-day working life. For this reason, **in case of doubts** about how to behave please remember Moncler Group's values and act in compliance with them.

If seek for advice, please contact:

- **Worldwide Compliance Function.**
- **Internal Audit Function.**

**Bribery**

*Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.*

**Facilitation payments**

*Payments in favor of Public Officials aimed at expediting, supporting or securing the realization of a routine activity (e.g. issuance of permits, licenses or other official documents, preparation of government documents, such as visas or other work orders and deployment of security forces to provide security).*

**Public official / public institution representatives**

*Whoever has been elected or appointed to exercise a legislative, judiciary or administrative function;*

*Whoever acts - on an official basis - on behalf of (i) a national, regional or local Public Administration, (ii) an agency, office or body of the European Union or of a (national or foreign, regional or local) Public Administration, (iii) an enterprise controlled or participated by a (national or foreign) Public Administration, (iv) a public international organization, such as the European Bank for the Reconstruction and Development, the International Bank for the Reconstruction and Development, the International Monetary Fund, the Global Bank, the United Nations or the World Trade Organization or (v) a political party, a member of a political party or a candidate for a (national or foreign) political office;*

*Any person in charge of a public service and, as a consequence, anyone who performs a public service, where public service means any activity which - even if ruled by the same provisions applicable to public functions - does not imply the use of those powers pertaining a public function. Such definition does not include ordinary functions or material activities.*

**Business partners**

*The term "Business Partners" includes, but is not limited to, Joint Ventures.*

**Due Diligence**

*A corruption risk-based Due Diligence should be performed with the aim of identifying and documenting any reference to unethical or suspicious conduct of the potential counterparty to be engaged in business relationships (i.e. business partners for joint ventures, Executives, strategic suppliers, external accountants, agents and intermediaries, brokers, "non institutional" recipients for donations and sponsorships) and should consist of the below listed activities. Additional investigations may be appropriate in certain circumstances.*

- **Background check:** *gather all the relevant information disclosed related to the counterparty: identity, any related entities (e.g. parent companies, subsidiaries, etc.), Principals, Executives or key employees/management, business references (history and experience)<sup>1</sup>;*

[continue]

<sup>1</sup> Possible sources: contacting former employer/client/partner, media search, databases subscription, Embassies, Consulates, etc.

- **Integrity check:**

- Checks criminal records for the counterparty, principals and key management personnel and individual (if legally permissible in the country concerned);
  - Gather information about debarred or restricted parties lists (e.g. the list of companies published on the World Bank website).
  - Alternatively, provide to the counterparty a questionnaire to be filled in with all the relevant information to be verified in terms of completeness and correctness.
- Obtain financial references of the counterparty. For relevant counterparties, a third party financial referee may be requested to state the length of the relationship and provide an opinion of reliability, financial capabilities and probity.
  - Search and review counterparty's codes of ethics, anti-corruption compliance programs (e.g. policy and procedures, whistleblower policy), entertainment or gifts procedures and policies, codes of conduct for suppliers and other relevant documents, in order to understand if the supplier operate according to Moncler ethical principles.

**Joint venture**

Any agreement aimed at establishing a joint venture, consortium, associations (including temporary associations among enterprises), collaboration agreements or any further entity (whether legal or not), in which Moncler has an interest.

**Suppliers**

All the Companies or professionals from whom Moncler Subsidiaries purchase materials, equipment and all other goods or services necessary for carrying out their activities.

**Gifts and Gratuities**

Anything of value or benefit provided to a third party as action of commercial courtesy, which is free of charge.

**Local Management**

President of Regions and Head of Local Functions.