



BERLUTI SA

Anti Modern Slavery Statement 2024

Introduction

This Anti Modern Slavery statement is published by BERLUTI SA ("BERLUTI") pursuant to section 54 of the Modern Slavery Act 2015 and was approved by the Board on 16th June 2025. The statement is updated annually.

Since the publication of its first Anti Modern Slavery statement in June 2017, BERLUTI and its affiliated companies (together "the BERLUTI Group") have continued to focus on extending their work to combat modern slavery into their sourcing and operations chains and strived to work ever more closely with their suppliers to ensure their workforce, and the workforce of their supply chains, including contractors, are treated with respect and dignity.

Over the past year, BERLUTI has introduced in its relationships with new stakeholders and/or for all new contracts the LVMH Suppliers and Business Partners Code of Conduct to replace its existing supplier code of conduct and BERLUTI has been maintaining its actions and internal rules aimed at preventing and combatting slavery and human trafficking from taking place in its supply or operation chains.

BERLUTI recognises that its ethical trading program requires constant monitoring and improvement.

Business

BERLUTI, the French parent company of the BERLUTI Group is closely linked to the LVMH Moët Hennessy Louis-Vuitton SE ("LVMH") Group.

BERLUTI is the owner of the BERLUTI trademark and tradename throughout the world.

BERLUTI sells Luxury and high quality products under the BERLUTI trademark including shoes, leather goods, bags, accessories, ready-to-wear, home decoration, etc. (the "Products"), to clients in Europe, including in the United Kingdom, as well as in many other countries worldwide.

Supply chains

Products are mainly manufactured through BERLUTI's industrial subsidiary. BERLUTI purchases directly from local suppliers, services and products necessary to run its business.

Policies and Practices

BERLUTI's commitment is to act with integrity in all its business dealings and to promote ethical conduct, to enhance compliance with applicable laws and to provide guidance with respect to business conduct. It has several policies that are relevant to this commitment, which set out what BERLUTI expects from its employees, contractors, internal business and its external suppliers and their supply chain.

BERLUTI engages in multiple internal and external actions to gauge and combat the risk of modern slavery, including human trafficking occurring in its supply chains and to assess and manage potential risks related to its supply chain. BERLUTI's due diligence includes internal risk assessments utilizing information gathered from organizations with expertise in social compliance issues, other companies, and various additional external resources.

In the context of the new European Union directives regarding duty of vigilance, several audits have been conducted on direct and indirect sourcing production suppliers, to ensure compliance with our below listed policies and ethical standards. No major issue has been identified.

Key policies and practices are:

1. LVMH Group Suppliers and Business Partners Code of Conduct (the "Code") — available upon request

In 2024, the LVMH Group updated its Suppliers Code of Conduct to turn it into a wider Suppliers and Business Partners Code of Conduct, in order to include all its external stakeholders.

The Code applies to all LVMH Group Maisons, including BERLUTI. The Code accordingly helps Maisons maintain a consistent approach to their suppliers and supply chains, including in relation to combating the risk of modern slavery.

The Code includes several new and updated commitments to reflect changes in the law and societal norms and one new commitment is inserted notably to help protect local or indigenous communities.

The Code requires suppliers to commit to implementing an alert line for their own workers and stakeholders. It provides suppliers with access to the LVMH Alert Line where they can raise suspected or witnessed ethical breach, including suspicion of modern slavery.

Penalties for non-compliance of the Code include the right of a Maison to require a supplier to take corrective action and to refuse to take delivery of products until the violations are remedied to its satisfaction, and the right to terminate the business relationship (subject to compliance with legal duties and obligations). The Code also includes an audit clause allowing the Maison to conduct an audit, including in the suppliers' premises.

2. Supplier and Contractor due diligence

BERLUTI ensures that its new suppliers are carefully chosen for the entire BERLUTI Group and that prior to entering into any new contractual relationship with a supplier or contractor, supplier and contractor commit to comply with the Code. As such, the signature of the Code is a mandatory prerequisite without which BERLUTI cannot enter into relationship. The sending of the signed Code is mandatory under BERLUTI's accounting's supplier creation process.

BERLUTI reserves the right to check adherence of BERLUTI Group and its suppliers and contractors to the principles set out in the Code and to conduct compliance audits at any time.

Upon reasonable request, BERLUTI can require BERLUTI Group and its suppliers and contractors to supply requested information and grant access to BERLUTI representatives to verify compliance with the requirements of the Code. Suppliers and contractors are obliged to keep proper records to prove compliance with the Code and to provide access to complete, original, and accurate files to BERLUTI representatives.

BERLUTI suppliers and contractors could be required to improve and correct any deficiency discovered during such audits.

BERLUTI shall use its reasonable endeavours to ensure that all BERLUTI Group supplier and contractor template contracts contain clauses that require them to adopt similar anti-modern slavery standards and practices.

BERLUTI requires its staff, suppliers, and their supply chains to engage in and promote honest and ethical conduct, act in accordance with our values and culture, comply with all applicable laws, rules and regulations in their own area and act responsibly, with due care, competence and diligence when dealing with staff, customers, suppliers, agents, and intermediaries.

As such, BERLUTI has amended its Terms and Conditions and their contractual terms to make suppliers more accountable for the conduct of their eventual subcontractors. The signature of a contract or the Terms and Conditions is a mandatory prerequisite without which BERLUTI cannot enter into relationship. The sending of the signed Code is mandatory under BERLUTI's accounting's supplier creation process.

3. Staff/ Employees

○ Training and Awareness

According to the guidelines from the British Standards Institution, specifically BS 25700:22 titled "Organizational responses to modern slavery — Guidance;" it is acknowledged that practices of modern slavery are possible across all nations and sectors of industry. Additionally, it highlights certain elements that may heighten the likelihood of such exploitation. These include discriminatory practices rooted in ethnic background, gender identity, social caste, tribal affiliation, religious beliefs, as well as issues surrounding bribery and corruption.

In response, the LVMH Group launched a new dedicated e-Learning module campaign, in 2024, related to anti-corruption and anti-bribery, including BERLUTI employees and all BERLUTI new joiners, to help identify, prevent, and sanction bribery or corruption. A record of attendance is maintained and completion is strictly monitored.

In 2023-2024, BERLUTI provided specific training to employees with direct responsibility for supply chain management and purchasing in particular. This will be renewed in 2025-2026.

The purpose of BERLUTI's ethics and compliance training program is to ensure that BERLUTI is promoting a working environment where all individuals are equipped with the ability to identify unethical or potentially unethical practices as they perform their day-today work.

○ LVMH Employees' Code of Conduct

LVMH's Employee's Code of Conduct, signed by all the Group's employees (including BERLUTI's employees) and received and signed during all new staff onboarding, demonstrates BERLUTI's ambition for its staff to act with, and commit to, integrity in the conduct of its business in an environment that is free from all form of unethical behaviour including forced or compulsory labour, child labour, slavery, human trafficking, discrimination, corruption and harassment and therefore provides a common framework of values and principles to provide guidelines to its staff.

In 2024, the LVMH Group has also updated its Employees' Code of Conduct in 2024 along with the publication of a brand new Anticorruption Charter. This has been communicated to all BERLUTI employees at worldwide level in 2024.

The Employee Code of Conduct is available in 25 languages and is divided into three chapters: 1) a committed Group; 2) a responsible employer and 3) a Group with integrity.

Each employee must personally comply with these commitments in all circumstances. Any failure may be subject to disciplinary measures and sanctions proportionate to the seriousness of their actions. Such sanctions may include dismissal.

- Whistleblowing Policy/Internal Alert Systems

All members of staff or external partners with inquiries regarding the interpretation of our company's internal policies or who possess ethical worries are encouraged to voice their concerns or seek guidance through our whistleblowing alert system. Our whistleblowing system aims to encourage all members of staff or external partners to identify and raise concerns of past, present, or future wrongdoing, whether suspected or witnessed, including any related to modern slavery within BERLUTI Group or our supply chains, using appropriate, confidential channels.

Moreover, any personnel cognizant of transgressions against prevailing legal statutes, our Code of Conduct, or any directives and policies set forth by BERLUTI and/or by the LVMH Group, are urged to communicate such instances either to the Human Resources department or directly to their Maison's Ethics and Compliance Officer.

To complement, our conglomerate offers all employees and associated parties access to the LVMH Alert Line, a digital portal which ensures anonymity and security for those wishing to report, in good faith, any breaches of legal obligations or internal ethical standards.

In 2024, all employees have continued to benefit from the whistleblowing alert system and have had regular reminders about the principles of the Employees' Code of Conduct each time a new communication regarding ethics and compliance policies of BERLUTI has been sent inside the company.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes BERLUTI's Anti-Modern Slavery statement for the financial year ending 31 December 2024.

The Board of Directors of BERLUTI has approved this statement and it has been duly signed by the following director:

JEAN-MARC MANSVELT

President du Directoire – Berluti SA

Date : June 23rd 2025