

CANALI

**SUPPLIER AND BUSINESS PARTNER
CODE OF CONDUCT
CANALI**

12 October 2026

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INTRODUCTION

Canali Holding S.p.A. and the companies it directly or indirectly controls (hereinafter also “CANALI” or the “Companies”) are committed to operating with integrity and in compliance with applicable laws and regulations, with particular regard to labour standards, social responsibility, environmental protection, and business ethics and integrity. CANALI therefore expects its Business Partners and Suppliers to operate in compliance with applicable laws and regulations and, to this end, has adopted this “Supplier and Business Partner Code of Conduct” (the “Code”), which sets out the essential standards applicable to any Supplier or Business Partner that does business with CANALI.

For the purposes of this Code:

- “Supplier”: any company or individual that supplies products, materials, manufacturing operations, personnel or services to CANALI, including, where relevant, its personnel, subcontractors and sub-suppliers involved in the supply;
- “Business Partner”: any other third party that has a business relationship with CANALI, including distributors, licensees, agents and joint venture partners.

The Code supplements the contractual provisions in force between the parties. Acceptance of and compliance with the Code are an essential condition for establishing and continuing the relationship with CANALI.

CANALI recognises that Suppliers and Business Partners may differ in size, structure and activities: the requirements of the Code therefore apply in a manner proportionate to the nature of the supply and the related risks. The fundamental principles concerning compliance with the law, human and labour rights, health and safety, integrity and protection of information are, in all cases, non-negotiable.

The provisions specifically relating to the manufacturing supply chain apply to parties involved, directly or indirectly, in the production, processing, transformation, finishing, manufacturing, packaging or supply of raw materials and components intended for CANALI products. The provisions concerning data, digital systems, cybersecurity and artificial intelligence apply where such elements are involved in the supply.

ESSENTIAL PRINCIPLES

1. Comply with applicable laws and act with integrity.
2. Do not use child labour, forced labour, or any irregular, unregistered or undeclared work.
3. Treat every worker with dignity and respect, without discrimination or harassment.
4. Ensure lawful employment relationships, remuneration, working hours and rest periods in compliance with applicable laws and standards.
5. Protect workers’ health and safety.
6. Reduce environmental impacts and ensure the compliance of materials, substances and products.
7. For the manufacturing supply chain, do not entrust CANALI manufacturing operations to unauthorised parties or sites.

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8. Conduct business with integrity, preventing corruption, money laundering, conflicts of interest, anti-competitive practices and breaches of applicable trade restrictions.
9. Protect CANALI information, data, intellectual property and systems, and use artificial intelligence responsibly and in compliance with applicable laws.
10. Promptly report potential material violations, cooperate with checks and promptly remedy non-compliance.

1. LAWS, STANDARDS AND APPLICABILITY

Suppliers and Business Partners must comply with all applicable laws in the countries in which they operate and, where relevant, with the principal international standards on human and labour rights, including the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the fundamental Conventions of the International Labour Organization (ILO).

Where compliance with this Code would conflict with mandatory provisions of applicable local law, the Supplier must promptly inform CANALI. Where the Code and applicable law pursue the same objective, CANALI requires application of the standard that provides the greater level of protection, to the extent permitted by law.

2. ETHICAL PRINCIPLES FOR THE PROTECTION OF WORKERS

2.1 Dignity, respect and non-discrimination

Suppliers and Business Partners must treat all persons with dignity and respect. Discrimination, harassment, including sexual harassment, abuse, violence, threats, intimidation, coercion or retaliation are not tolerated. Employment-related decisions must be based on lawful and non-discriminatory criteria.

2.2 Protection of minors, forced labour and undeclared work

Suppliers and Business Partners must not employ persons under the age of 16 or under any higher minimum age established by local law. Workers under the age of 18 must not be employed in hazardous activities, night work or overtime in breach of applicable laws and standards.

Forced or bonded labour, modern slavery, human trafficking and any form of irregular, unregistered or undeclared work are prohibited. Workers must be able to retain their identity documents, move freely and terminate their employment in accordance with the conditions established by law. Deposits or improper recruitment fees must not be required as a condition of employment.

2.3 Employment relationships, remuneration, working hours and freedom of association

Employment relationships must be lawful and documented in accordance with applicable law. Workers must receive understandable information on the principal terms and conditions of employment. Temporary or flexible contractual arrangements must not be used for the purpose of circumventing protections provided by law or applicable collective bargaining agreements.

Remuneration, benefits, overtime, working hours, rest periods, holidays and leave must comply with applicable law, applicable collective bargaining agreements and, where more protective, recognised

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industry standards. Systematic reliance on overtime work is not permitted. Suppliers and Business Partners must respect workers' rights to freedom of association and collective bargaining, without interference or retaliation.

2.4 Health and safety

Suppliers and Business Partners must provide healthy and safe working environments and adopt appropriate measures to identify, prevent and manage health and safety risks, including, where relevant, psychosocial risks. Depending on the activities performed, appropriate training, emergency procedures, personal protective equipment, first aid, and measures relating to building safety, fire safety, machinery, equipment and hazardous substances must be provided.

Where accommodation is provided to workers, it must be safe, healthy and compliant with applicable law.

3. ETHICAL PRINCIPLES IN INTERNAL PROCESSES

3.1 Anti-corruption and business ethics

CANALI adopts a zero-tolerance approach to corruption. Suppliers and Business Partners must not offer, promise, request or accept, directly or through third parties, payments, favours or other improper advantages, nor make facilitation payments. They must comply with applicable anti-corruption laws and adopt preventive measures proportionate to their activities and related risks.

Gifts and hospitality connected with the relationship with CANALI must be lawful, appropriate, reasonable and not intended or capable of improperly influencing business decisions. Suppliers and Business Partners must not, on behalf of CANALI, offer gifts or hospitality to public officials or make political contributions on behalf of CANALI.

3.2 International sanctions, export controls and customs

Where applicable to the supply, Suppliers and Business Partners must comply with applicable economic and trade sanctions, international restrictions and import and export control rules. They must not involve in activities performed for CANALI any persons or entities subject to applicable prohibitions or restrictions. Where relevant, they must also comply with customs laws and provide accurate information on the classification, value and origin of goods. Transshipment, routing through third countries or other arrangements or other transactions intended to circumvent trade restrictions, import or export controls, or rules of origin are prohibited.

3.3 Anti-money laundering, competition and integrity of information

Suppliers and Business Partners must not be involved in money laundering, terrorist financing or the financing of other unlawful activities and must comply with applicable laws. They must also comply with competition and antitrust laws, avoiding anti-competitive agreements or practices, including price fixing, market allocation or the unlawful exchange of sensitive information. Documents, records, certifications and information provided to CANALI must be accurate and truthful; any falsification or intentional alteration is prohibited.

4. ENVIRONMENTAL PROTECTION AND RESPONSIBLE PRODUCTION

4.1 Environmental protection

Suppliers and Business Partners must comply with applicable environmental laws, permits and requirements and adopt proportionate measures to reduce the impacts of their activities, with particular attention to energy and water consumption, emissions, waste and the use of hazardous substances.

Where applicable and at CANALI's request, Suppliers and Business Partners must monitor and make available environmental data relevant to the supply. Smaller Suppliers may adopt simplified management systems, including non-certified systems, provided they are appropriate to the main environmental risks and impacts.

4.2 Responsible sourcing of materials

Suppliers and Business Partners must use raw materials, components, chemicals and packaging responsibly, complying with applicable restrictions and, where possible, reducing the use of hazardous substances and unnecessary resources.

Where relevant to the supply, they must ensure adequate traceability of the origin of materials and comply with applicable provisions concerning labelling, product origin, requirements governing the use of the 'Made in Italy' designation, and sourcing from conflict-affected or high-risk areas.

4.3 Product compliance and chemicals

The provisions of this section apply to Suppliers in the manufacturing supply chain. Materials, components and products intended for CANALI must comply with the specifications communicated by CANALI and with applicable laws concerning safety, composition, labelling and chemicals, including the REACH Regulation where applicable, as well as any PRSL/MRSL communicated by CANALI.

Suppliers must properly manage and document the use of chemicals, maintain appropriate evidence demonstrating compliance and allow CANALI, directly or through appointed third parties, to carry out testing and checks on the materials and products supplied.

5. ETHICAL PRINCIPLES IN RELATIONSHIPS WITH CANALI

5.1 Privacy, information security and business continuity

The provisions of this section apply where the supply involves the processing of personal data or access to CANALI data, information, systems or infrastructure. Suppliers and Business Partners must comply with applicable laws and the agreements entered into with CANALI and adopt appropriate technical and organisational measures to protect the confidentiality, integrity and availability of the data and systems involved in the supply. Where necessary in view of the service, they must also ensure appropriate business continuity measures.

5.2 Artificial intelligence

The provisions of this section apply where artificial intelligence systems, whether traditional or generative, are used in connection with services or activities provided to CANALI. Suppliers and Business Partners must inform CANALI sufficiently in advance of any use of such systems, comply with applicable laws and adopt a responsible approach to the use of artificial intelligence. CANALI data, content or information may not be used to train or improve artificial intelligence models or systems of the Supplier or any third party without CANALI's prior written consent.

5.3 Protection of intellectual property, confidentiality and public statements

Suppliers and Business Partners must protect CANALI's confidential information, trade secrets, trademarks, know-how, content, products and other intellectual or industrial property rights and use them solely for authorised purposes. Any public statement or communication using CANALI's name, trademarks or references to CANALI must comply with confidentiality obligations and be authorised in advance where required.

5.4 Conflicts of interest

Suppliers and Business Partners must avoid conflicts of interest and promptly disclose to CANALI any actual, potential or perceived conflict that may affect the business relationship or the impartiality of decisions. Information obtained in the relationship with CANALI must not be used to obtain improper personal benefits or for unauthorised purposes.

5.5 Subcontracting and transparency of the manufacturing supply chain

The provisions of this section apply to Suppliers involved in CANALI's manufacturing supply chain. Supply chain transparency is an essential requirement: Suppliers must disclose to CANALI, in accordance with the required procedures, the manufacturing sites and parties involved in activities carried out for CANALI and must not entrust such activities to subcontractors, sub-suppliers, homeworkers or other parties not previously authorised in writing by CANALI.

Suppliers must not use unregistered workshops or workshops that otherwise fail to comply with applicable law. They must notify CANALI in advance of material changes to their manufacturing sites or authorised supply chain and obtain the required approvals before such sites or parties are used for CANALI supplies. They must also ensure that authorised sub-suppliers comply with principles equivalent to those set out in this Code, carry out controls proportionate to risk and maintain sufficient information to reconstruct, where requested, the supply chain for manufacturing operations and materials intended for CANALI products.

Unauthorised overproduction or production entrusted to unauthorised parties or sites constitutes a serious breach of this Code.

6. MONITORING, COMPLIANCE, ENFORCEMENT AND REPORTING

6.1 Reporting

For questions or requests for clarification concerning this Code, Suppliers and Business Partners may contact their relevant CANALI representative. The Supplier or Business Partner must promptly inform

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CANALI of violations or reasonable suspicions of violations of the Code connected with activities performed for CANALI. This obligation does not limit the possibility of using CANALI's Whistleblowing channel. Violations or suspected violations may be reported safely and confidentially through CANALI's Whistleblowing channel, available at the following link: <https://it.canali.com/segnalazioni>

Suppliers in the manufacturing supply chain must make their workers aware of access to the CANALI channel in a manner appropriate to the context. Where proportionate to their size and risks, Suppliers and Business Partners are also encouraged to make available their own reporting or grievance mechanisms, ensuring protection against retaliation.

6.2 Audits and checks

CANALI may verify compliance with this Code through document requests, questionnaires and audits, directly or through independent third parties, using a risk-based and proportionate approach. Suppliers and Business Partners must cooperate and make reasonably necessary information available.

For Suppliers in the manufacturing supply chain, checks may include access to work areas and internal records and, where deemed appropriate, confidential interviews with workers, as well as verification of any accommodation provided to them.

Audits may be announced, semi-announced or unannounced, to the extent permitted by law and the applicable contractual arrangements.

6.3 Corrective action plans and consequences

In the event of non-compliance, CANALI may request clarifications and agree with the Supplier or Business Partner on a corrective action plan with timeframes appropriate to the nature and severity of the violation. The Supplier or Business Partner must cooperate and promptly implement the agreed measures.

Serious, repeated or unremedied violations, failure to comply with a corrective action plan, or failure to cooperate with checks may result, depending on the severity and in accordance with applicable law and contractual arrangements, in the suspension of orders or of the business relationship, termination of the contract, and any further remedies available under the contract or applicable law.

The following are considered particularly serious, without limitation: violations relating to child or forced labour, corruption, unauthorised overproduction or unauthorised subcontracting, serious health and safety or environmental violations, and the intentional concealment of information requested by CANALI.

RESPONSIBILITY OF THE SUPPLIER AND BUSINESS PARTNER

The Supplier or Business Partner is responsible for compliance with this Code in connection with the activities performed for CANALI and, where applicable, must communicate the principles of this Code to its sub-suppliers and subcontractors involved in the supply. CANALI may periodically update the Code to reflect regulatory, organisational or risk developments, providing appropriate notice.