

1895
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BERLUTI SA

Anti Modern Slavery Statement 2023

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 24th June 2024. 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 years, BERLUTI has introduced and keeps on introducing in its relationships with new stakeholders and/or for all new contracts the LVMH Supplier 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 a number of 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

1895

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gathered from organizations with expertise in social compliance issues, other companies, and various additional external resources.

Key policies and practices are:

1. LVMH Group Supplier Code of Conduct (the “Code”) – available upon request

In 2022 BERLUTI suppliers' code of conduct has been replaced by the Code with all its new stakeholders and/or for all new contracts.

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 a number of 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.

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).

2. Anti-Modern Slavery Policy

BERLUTI's Anti-Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent modern slavery from taking place in our business or our supply chains.

BERLUTI ensures that BERLUTI Group requires its suppliers to share its commitments and act in full compliance with the relevant laws, including all national, local and international laws relating to the management of their businesses.

3. Supplier and Contractor due diligence

BERLUTI ensures that BERLUTI 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.

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.

1895

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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.

4. Staff/Employees

o 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 mandatory anti-corruption and anti-bribery e-Learning module for BERLUTI personnel, including BERLUTI employees and all new starters, to help identify, prevent, and sanction bribery or corruption. Any BERLUTI employees who had to complete this mandatory training did so by the end of 2023. A record of attendance is maintained.

BERLUTI provides training to employees in general and employees with direct responsibility for supply chain management and purchasing in particular.

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-to-day work.

o Employees' Code of Conduct

BERLUTI's Employees Code of Conduct, signed by all the 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.

The Employee Code is available in 19 languages and is divided into three chapters: 1) a committed Group; 2) a responsible employer and 3) a Group with integrity.

The Employee Code applied to all LVMH Group employees, was distributed in all Maisons and LVMH Group entities and given to all new employees when they arrived. Each employee must personally comply

1895
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with these commitments in all circumstance, failing which they may be subject to disciplinary measures and sanctions proportionate to the seriousness of their actions. Such sanctions may include dismissal.

In 2023, BERLUTI has also initiated a new campaign to renew the written acknowledgment of its employees' consent to the latest version of the Employees' Code of Conduct.

○ Whistleblowing Policy /Internal Alert System

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, 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 Berluti 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 2023, 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 2022.

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



JEAN-MARC MANSVELT
Director of BERLUTI
June 24th, 2024