

Ermenegildo Zegna Group

CHEMICALS MANAGEMENT POLICY

(as adopted on December 18, 2024)

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1. INTRODUCTION & PURPOSE

Ermenegildo Zegna N.V. and its subsidiaries and associates¹ (hereafter the “**Group**” or “**EZG**”) have always believed that the highest quality products come from the highest quality natural resources, and that these resources must be cared for. Responsibility towards people, community and the natural world has been at the heart of the Ermenegildo Zegna Group’s belief since its founding in 1910.

For this reason, the Group is committed to minimising environmental and occupational health and safety risks associated with chemical exposures and hazardous wastes, while strictly adhering to applicable local and international regulations and standards, as described in section 4 of this Policy.

The chemical management policy (the “**Chemical Management Policy**” or the “**Policy**”) sets out general standards and activities for handling chemicals responsibly and safeguarding the environment, workers and consumers, in compliance with applicable local and international regulations.

The Group bases all actions, operations, dealings, and transactions undertaken in its business activities on the ethical principles and rules of conduct set out in the Group’s Code of Ethics. Accordingly, this Chemical Management Policy should be read together with the Group’s Code of Ethics and other relevant policies, including but not limited to the Supplier Code of Conduct, the Environmental Policy and Occupational, the Occupational Health & Safety Policy.

2. SCOPE OF APPLICATION

The Chemical Management Policy applies to all business operations involved in the manufacturing of products for the Group’s brands, including at the Group’s direct suppliers.

All employees involved in operations, including manufacturing and sourcing activities, must act in compliance with this Policy.

The Group expects its direct suppliers to ensure that their sub-suppliers comply with the general standards and procedures outlined herein. In addition, the Group expects its direct suppliers and their sub-suppliers to have processes and remediation plans in place for addressing any non-compliance with the standards outlined in this Policy. The Group will evaluate any deliberate or repeated failure to address non-compliance according to the provisions set forth in the Supplier Code of Conduct and the contractual agreements between the parties.

¹ Ermenegildo Zegna Group refers to the Ermenegildo Zegna N.V. and its subsidiaries. With respect to any subsidiary or associate that Ermenegildo Zegna N.V. does not, directly or indirectly, control, it will use its reasonable best efforts to influence such non-controlled entities to adhere to this Policy.

3. GOVERNANCE OF THE POLICY

This Chemical Management Policy has been adopted by Ermenegildo Zegna N.V. as of December 18, 2024, through approval by the Group Chairman and Chief Executive Officer and shall be considered as the document of reference for chemical management matters by all its subsidiaries and associates.

In each of the Group's segments, based on the organizational structure, there is a dedicated inter-functional team composed of personnel from various functions, including the quality function and procurement function, who engage directly with suppliers. This team may also include external consultants with chemical expertise and product quality assurance skills. This inter-functional team is responsible for overseeing the implementation of this Policy and providing requirements and guidance to internal personnel and external suppliers regarding chemical management practices, supporting documentation and tests results. Their role includes ensuring that products meet established quality standards throughout the manufacturing process.

This dedicated inter-functional team meets periodically to discuss any amendments to the Group Restricted Substances List (EZG RLS) and evaluate any exceptions on the EZG RLS reported by suppliers, with support from the Legal Affairs function of each segment. The function team is also responsible for ensuring compliance with applicable regulations and standards. Additionally, this team reports annually to the Group Compliance and Risk Management function, as well as the Group Sustainability function, on the implementation status of this Policy.

This Policy is available on the Group's corporate website and any future amendments shall be deemed incorporated hereto [\[link\]](#).

4. POLICY STATEMENT & COMMITMENT

The Group has been a signatory of the ZDHC² Roadmap to Zero Program since January 1st, 2024, and is thus committed to zero discharges of hazardous chemicals from procedures and processes associated with the manufacturing and use of its products. This commitment includes:

- Ensuring compliance with all applicable laws and regulations in the countries where the Group's manufacturing processes take place, as well as where Group's finished products are sold.
- Identifying and eliminating hazardous chemicals from the supply chain through the adoption of the **EZG RSL**. The EZG RSL is comprised of:

² Zero Discharge of Hazardous Chemicals.

- **EZG Manufacturing Restricted Substances List (EZG MRSL).** The Group aligns its MRSL with the latest version of the ZDHC MRSL³ and expects all its supply chain partners to adhere to the restrictions and limitations set out in the EZG MRSL. To ensure chemical formulations used in the manufacturing processes of products and/or components and/or raw materials meet the EZG MRSL requirements, suppliers shall implement a chemical inventory and update it on a regular basis;
- **EZG Product Restricted Substances List (EZG PRSL).** The Group requires that each product and/or component and/or raw material purchased complies with the restrictions and limitations set out in the EZG PRSL. To ensure products and/or components and/or raw materials meet the EZG PRSL requirements, suppliers shall implement regular testing and quality assurance programs.
- Minimising water pollution through the adoption of the **ZDHC Wastewater Guidelines (ZDHC WWG)** at all wet-processing facilities. Wet-processing facilities within the textile segment of the Group and along the supply chain are therefore required to perform regular wastewater testing in accordance with the ZDHC Wastewater Guidelines and disclose results on the ZDHC Gateway – Wastewater Module. The Group is in the process of extending this requirement to all suppliers and subcontractors to promote compliance with these standards.
- Implementing a sustainable chemical management system to ensure the regular monitoring, reporting and continuous improvement of the Group chemical management practices.

5. CHEMICAL MANAGEMENT COMPLIANCE PROGRAM

The Group is committed to complying with all applicable laws and regulations relating to the management of chemicals in the Group's business operations. This commitment includes compliance with regulatory frameworks, including but not limited to the REACH Regulation (Registration, Evaluation, Authorization and Restriction of Chemicals). The Group also commits to complying with any other specific regulations regarding chemical management that may vary from country to country, applicable to the Group's manufacturing processes and the markets where the Group's finished products are sold.

Additionally, as a signatory of the ZDHC initiative, the Group aligns its practices with the ZDHC standards. To ensure effectiveness of this Chemical Management Policy, the following Group mechanisms have been put in place:

³The EZG MRSL includes also additional restrictions concerning perfluorinated compounds (PFCs).

5.1 Awareness and training

Information about this Policy is provided to all employees involved in chemical management or procurement activities with suppliers. Specific training may be conducted to ensure that employees understand their responsibilities and procedures related to chemical management, as well as the importance of strict compliance with regulations and company standards.

5.2 Supplier Compliance Monitoring and Reporting

Suppliers are required to comply with the EZG RSL and other relevant chemical management standards.

The Group has a systematic approach to monitoring compliance, including regular reviews of supplier declarations and chemical test results. This comprehensive process ensures strict adherence to established standards and includes continuous verification of supplier compliance through ongoing assessments. The Group may require suppliers to provide supporting documentation for all testing conducted.

The Group publicly reports on its chemical management commitments, targets and performance in its annual Sustainability Report, available at the Group's website (www.zegnagroup.com).

6. REPORTING ON VIOLATIONS

It is the responsibility of all individuals working with or for the Group to report any potential violations of this Policy or any violation of chemicals management laws and regulations.

The Group has established processes for employees and all other interested parties to raise concerns about misconduct confidentially and without fear of retaliation. Employees and third parties are invited to report any suspected violation of this Chemical Management Policy committed in the course of business activities in accordance with Section 4 of the Misconduct Reporting Policy, [available on the Group's website](#).

The Group reserves the right not to investigate grievances that fall outside this Policy or lack sufficient evidence.

7. MONITORING AND IMPROVEMENT

The Group is committed to continuous improvement in chemical management practices and will communicate its implementation efforts and progresses made towards the ZDHC Roadmap to Zero Program within its annual Sustainability Report.

The dedicated inter-functional team will regularly review this Policy and monitor its implementation to ensure it remains effective and takes into account emerging best practices, new scientific findings, technological advances and regulatory changes.