

# Ermenegildo Zegna Group

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## MISCONDUCT REPORTING POLICY

(as adopted on December 17, 2021 and updated on January 30, 2026)

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## 1. DEFINITIONS

**BAD FAITH WHISTLEBLOWING REPORT:** any Whistleblowing Report that, following the preliminary investigation under Section 4.2. of this Policy, does not qualify as a Good Faith Whistleblowing Report.

**BOARD:** the Board of Directors of Ermenegildo Zegna N.V.

**CONCERNED PERSON:** a natural person who is mentioned or is referred to in the Whistleblowing Report as the person to whom the Misconduct is attributed or with whom that person is associated.

**DATA CONTROLLER:** as defined in Section 6 of this Policy.

**DATA PROCESSOR:** as defined in Section 6 of this Policy.

**EMPLOYEE:** any individual having or having had an employment contract with Ermenegildo Zegna Group.

**ERMENEGILDO ZEGNA GROUP:** Ermenegildo Zegna N.V. together with its subsidiaries.

**ETHICS COMMITTEE:** a cross-functional internal body composed of two permanent members of management who include the Group Internal Audit in all cases, the Group Chief People Officer in HR-related Misconducts and the Group General Counsel in all other cases. Other members of the Ethics Committee can be designated by the Ethics Committee itself on a case by case basis, (a) considering - inter alia - the nature of the relevant Whistleblowing Report (e.g., for HR-related reports, the Ethics Committee will include the relevant HR Director; for ZEGNA IP-related reports, the Ethics Committee will include the ZEGNA Legal Affairs & IP Director), and (b) always ensuring an impartial assessment of the relevant Whistleblowing Report.

**GOOD FAITH WHISTLEBLOWING REPORT:** any Whistleblowing Report in which the Whistleblower reports - to the best of its knowledge - a Misconduct, provided that he/she (i) had grounds to believe and in good faith did believe that the information on the Misconduct was true at the time of reporting, and (ii) has not made falsely, maliciously, or for personal financial gain or (otherwise) the Whistleblowing Report, to cause unjust harm to any relevant person or entity reported or otherwise involved.

**MISCONDUCT:** any suspicion of possible misconduct or irregularities, or actual misconduct or irregularities, occurring in the Work-Related Context of Ermenegildo Zegna Group, including without limitations:

- breaches of Ermenegildo Zegna Group's Code of Ethics;
- breaches of applicable laws and regulations, at local, national and/or supranational level, including, without being limited to, breaches that, among others, concern the following areas: (i) prevention of money laundering and terrorist financing; (ii) product safety and compliance; (iii) transport safety; (iv) protection of the environment; (v) consumer protection; (vi) protection of privacy and personal data, and security of network and information systems, (vii) breaches affecting the financial interests of the European Union as referred to in Article 325 TFEU and (viii) breaches relating to the internal market as referred to in Article 26(2) TFEU;
- financial malpractice, including without limitation improper destruction of business or accounting records, misrepresentation of financial information, non-compliance with internal financial reporting policies or controls;
- conducts in breach of accounting, internal accounting controls or auditing rules and standards;

- threats to the environment;
- improper payments, such as offering or accepting a bribe or other corrupt payment;
- an aspect of Ermenegildo Zegna Group's operations or premises which may endanger someone's health or safety;
- drug or alcohol abuse in the Work-Related Context; and/or
- dishonesty or unethical behaviour.

**OTHER INTERESTED PARTY:** persons having an interest in submitting a Whistleblowing Report, including, without being limited to, persons carrying out or having carried out work for Ermenegildo Zegna Group, former employees of Ermenegildo Zegna Group, persons having self-employed status, third-party suppliers, contractors, sub-contractors of Ermenegildo Zegna Group, customers, agents, brokers and similar, officers, directors, shareholders and persons belonging to the administrative, management, control or supervisory body of an undertaking, including non-executive members, even when such functions are exercised merely de facto, volunteers and paid or unpaid trainees, any persons working under the supervision and direction of contractors, subcontractors, and suppliers of Ermenegildo Zegna Group, any other person having acquired information about the relevant Misconduct during a recruitment process or other pre-contractual negotiations, as well as any other subject or entity entitled to submit a Whistleblowing Report according to local laws.

**POLICY:** this Misconduct Reporting Policy.

**PRIVACY REGULATION:** as defined in Section 6 of this Policy.

**PROTECTED PERSON:** include: (a) facilitators (i.e., natural persons who assist a Whistleblower in the reporting process); (b) persons who are connected with the Whistleblower, such as colleagues or relatives of the Whistleblower; (c) legal entities that the Whistleblower owns, works for or is otherwise connected with; and (d) any persons working under the supervision and direction of contractors, subcontractors, and suppliers of Ermenegildo Zegna Group.

**WHISTLEBLOWER:** any Employee or Other Interested Party that is reporting or has reported Misconduct according to this Policy.

**WHISTLEBLOWING REPORT:** any report of Misconduct submitted by a Whistleblower. Personal complaints and grievances from an Employee or Other Interested Party against any supervisor or Employee of Ermenegildo Zegna Group that do not involve any Misconduct shall not be considered Whistleblowing Reports for the purposes of this Policy.

**WORK-RELATED CONTEXT:** current or past work activities in or for Ermenegildo Zegna Group through which, irrespective of the nature of those activities, Whistleblower acquires information on alleged Misconduct.

## 2. GOALS AND SCOPE OF THE POLICY

Ermenegildo Zegna Group is committed to conducting its business at all times in compliance with all applicable laws and regulations and its Code of Ethics. Therefore, it is of essence that Ermenegildo Zegna Group is made aware of any and all instances of Misconduct.

This Policy is intended to encourage any Employee and Other Interested Party to report any Misconduct, confidentially and without fear of reprisals. This Policy sets out reporting procedures applicable when reporting Misconduct, including how these will be followed up, and how Whistleblowers are protected.

This Policy applies to all Employees and Other Interested Parties and is formally adopted by the companies of Ermenegildo Zegna Group.

The Policy is available in various languages, according to the countries in which the Ermenegildo Zegna Group is present, together with internal operating procedure prepared to enable effective and immediate understanding of its contents.

The Audit Committee of the Board is responsible for (a) reviewing and recommending approval of this Policy to the Board, and (b) reviewing this Policy and proposing amendments for the approval of the Board from time to time as it deems appropriate.

### **3. EXTERNAL REGULATORY REFERENCE CONTEXT**

Ermenegildo Zegna Group operates and requires all its Employees and Other Interested Parties to act in full compliance with all applicable supranational, national and local laws and regulations. In some countries, Ermenegildo Zegna Group standards and rules may be broader than local legal requirements. In addition, Ermenegildo Zegna Group may prohibit certain behaviours, regardless of whether they are prohibited by law. Ermenegildo Zegna Group applies best standards independently of whether the Misconduct is legally prohibited.

This Policy is intended to meet:

- the requirements of Rule 10A-3(b)(3) under the U.S. Securities Exchange Act of 1934, as amended;
- Directive (Eu) 2019/1937 of the European Parliament and of the Council of 23rd October 2019 on the protection of persons who report breaches of Union law, as implemented by applicable national laws in the relevant jurisdictions.

Any derogation to this Policy is permitted only to the extent it is required by local applicable laws and regulations.

### **4. MANAGEMENT OF WHISTLEBLOWING REPORTS**

#### **4.1. CHANNELS OF COMMUNICATION**

Ermenegildo Zegna Group encourages an open culture and emphasises the importance of Employees and Other Interested Parties raising any concerns to assess, investigate and gather additional information, if required. Pursuant to this Policy, Employees and Other Interested Parties who become aware of Misconduct may file a Whistleblowing Report through any of the relevant channels of communication described in this Section 4.1.. In addition, before submitting a Whistleblowing Report, any Employee can also consult with, and/or report the relevant Misconduct to, his or her immediate supervisor or his/her relevant HR representative.

To facilitate the submission of Whistleblowing Reports, Ermenegildo Zegna Group offers the following channels of communication:

- A written reporting channel through a dedicated Web Portal (see Section 4.1.1. below);
- An oral reporting channel (see Section 4.1.2 below);
- Where requested, the possibility to submit a Whistleblowing Report through an in-person meeting (see Section 4.1.3. below).

The availability of the above reporting channels may vary from one country to another, as detailed in Annex A to this Policy.

#### **4.1.1. WRITTEN REPORTING CHANNEL**

The Web Portal is hosted by an independent supplier and is available 24/7. Employees and Other Interested Party have access to the Web Portal through the following link: [zegna.ethicspoint.com](http://zegna.ethicspoint.com).

After selecting the relevant language, the Employee or the Other Interested Party is requested to choose the type of Misconduct and to describe the circumstances and the facts through a questionnaire.

While Employees and Other Interested Parties are encouraged to report their concerns openly, as this enables fuller and more effective investigation of the Misconduct, Employees and Other Interested Parties will have the option to remain anonymous. In any case, whether or not the Whistleblowing Report is anonymous, the Whistleblower is invited to provide a Whistleblowing Report with as many details as possible and based on precise and concordant elements.

When the written Whistleblowing Report has been completed, a unique case number is assigned, to allow the Whistleblower to monitor the progress of the case. Therefore, the Whistleblower is recommended to periodically access the Web Portal.

#### **4.1.2. ORAL REPORTING CHANNELS**

The oral reporting channel is available through the following tools:

- (a) a browser-based voice reporting system accessible via the Web Portal (“**Click Connect**”), which allows direct and secure voice communication with the independent service provider, without the recourse to a traditional phone line. It just requires a browser, microphone, and internet connection; or
- (b) in certain jurisdictions, as indicated in Annex A, only a phone hotline.

Both oral reporting tools are provided by an independent supplier and are available 24/7. Employees and Other Interested Parties making use of an oral reporting channel will have the option to remain anonymous.

After the oral report has been completed, a unique case number is assigned, to allow the Whistleblower to monitor the progress of the case. By referencing the unique case number assigned, the Whistleblower will be able to call back the hotline, access the Web Portal and/or monitor the progress of the case.

The oral report will be transcribed and submitted to the Ethics Committee. The Whistleblower shall have the right to review and rectify or confirm the transcription with its signature.

#### **4.1.3. IN-PERSON MEETINGS WITH THE WHISTLEBLOWER**

Where requested by the Employee and Other Interested Party, Ermenegildo Zegna Group shall make available the possibility to submit a Whistleblowing Report through an in-person meeting with any representative of the Ethics Committee, upon request to be submitted via the following email address: [ethicscommittee@zegna.com](mailto:ethicscommittee@zegna.com). The email can be used only and exclusively to request such in-person meeting, not for interactions between the Whistleblower and the Ethics Committee.

Such meeting shall be organized within a reasonable timeframe and may be held in person or through secure remote communication tools, ensuring confidentiality and compliance with applicable whistleblowing and data protection laws.

A written record of the meeting shall be prepared by the Ethics Committee. Where appropriate and with the consent of the Whistleblower, the minutes may be supported by an audio recording made using suitable electronic devices.

The written record shall then be submitted to the Whistleblower for review, rectification, or confirmation with its signature.

#### **4.2. PRELIMINARY INVESTIGATION**

Ermenegildo Zegna Group takes every Whistleblowing Report seriously.

Within seven days from the submission of a Whistleblowing Report and if he/she has provided his/her email address, the Whistleblower shall receive a notice as an acknowledgement of receipt.

If the Whistleblowing Report has not been submitted through the communication channels provided in this Section 4, but it was sent to a specific person, the recipient of the Whistleblowing Report shall promptly, and in any case within seven days from its receipt, forward the Whistleblowing Report to Ethics Committee, using appropriate confidentiality measures, and inform the Whistleblower.

If a Whistleblowing Report concerns any member of the Ethics Committee as Whistleblower, Concerned Person or Protected Person, the affected member shall abstain from the management of the Whistleblowing Report, which shall be carried out by the other members of the Ethics Committee with the same guarantees of independency and impartiality.

The Ethics Committee proceeds with an initial assessment and classifies all Whistleblowing Reports received, based on the description of facts, events and/or circumstances. In case a Whistleblowing Report is not sufficiently detailed or is not clear enough, the Ethics Committee is entitled to require the Whistleblower, where feasible, to provide additional information and documentation.

The Whistleblower is recommended to periodically access the reporting channel employed, in order to monitor the progress of the Whistleblowing Report and/or to submit additional information or clarifications, as may be required to investigate the reported matters.

The Web Portal, the oral reporting channels and, where applicable, emails with the persons engaged in the in-person meeting, are the only communication channels between the Whistleblower on the one side, and the Ethics Committee or any other person involved in the investigation process on the other side.

The Ethics Committee examines Whistleblowing Reports, decides whether the Whistleblowing Report constitutes a Good Faith Whistleblowing Report or a Bad Faith Whistleblowing Report, and accordingly decides whether to continue the investigation process.

In case of a Bad Faith Whistleblowing Report, as well as in case the Whistleblowing Report is manifestly not grounded, is out of scope or is irrelevant according to this Policy and/or applicable laws requirements, the Ethics Committee shall close the case and shall inform Whistleblower about the reasons for which the case has been closed.

### **4.3. INVESTIGATION**

The purpose of the investigation phase is to proceed with reviewing, evaluating and analysing any Whistleblowing Report.

Depending on the circumstances, the Ethics Committee will decide whether the investigation is conducted by the Internal Audit department, by other internal functions, and/or by third-party providers or consultants duly appointed in this respect, with the appropriate guarantees of confidentiality and protection of the Whistleblower's identity. The decision will be based on multiple factors, including, without being limited to, the complexity and the nature of the reported facts.

Due to the diverse nature of Whistleblowing Reports, it is not possible to set precise timelines for the completion of the investigation phase, although such investigation should be conducted as promptly as practicable without affecting the quality and depth thereof.

At the end of the investigation phase, an investigation report will be prepared by the team that has conducted the investigation and submitted to the Ethics Committee.

### **4.4. EVALUATION**

Subject to the provisions of Section 4.8. below with regard to accounting, internal controls or auditing matters, the Ethics Committee:

- a) examines the investigation report;
- b) decides whether the investigation is sufficient or if further investigations are needed;
- c) approves any actions necessary or appropriate to remedy the issues highlighted in the investigation report;
- d) decides any action (including disciplinary measures) against the Concerned Person and/or the Whistleblower who submitted a Bad Faith Whistleblowing Report.

If the Ethics Committee establishes, as a result of the investigation of a Whistleblowing Report, that Misconduct has occurred, Ermenegildo Zegna Group will take appropriate measures (including disciplinary measures) proportioned to the extent and severity of the Misconduct against the Concerned Person.

If it emerges, from the results of the investigation phase, that a report is a Bad Faith Whistleblowing Report, the Ethics Committee will decide on any potential action (including disciplinary measures) to be taken against the Whistleblower.

Any decision from the Ethics Committee will be subsequently adopted and implemented by the relevant company of Ermenegildo Zegna Group. The Ethics Committee monitors the implementation of any measures adopted based on the outcome of the investigation of a Whistleblowing Report and ensures that the Whistleblower is promptly informed, where feasible and appropriate.

#### **4.5. FEEDBACK**

Unless any other longer period is required due to the complexity of the case and the subsequent investigation, within three months from the acknowledgement of receipt or, if no acknowledgment of receipt was sent to Whistleblower, within three months from the expiry of the seven-day period from the reporting of the Misconduct, the Whistleblower shall be informed on the status, the outcome of the investigation and the decisions taken by the Ethics Committee, in any case subject to Sections 4.6. (*CONFIDENTIALITY*) and 6. (*PROCESSING OF PERSONAL DATA*) of this Policy.

Any information shared with the Whistleblower about the investigation and any actions taken in connection therewith must be treated as confidential by the Whistleblower.

Ermenegildo Zegna Group cannot guarantee the outcome expected or desired by the Whistleblower. However, Ermenegildo Zegna Group is committed to dealing with the Whistleblower's genuine concerns fairly and appropriately.

#### **4.6. CONFIDENTIALITY**

Ermenegildo Zegna Group will treat any Whistleblowing Report under this Policy confidentially, in order to allow for an adequate investigation and to comply with applicable privacy laws. Ermenegildo Zegna Group will ensure that appropriate measures are taken to preserve the confidentiality of the data and of the information included in the Whistleblowing Report, and that the identity of the Whistleblower, of the Protected Person and of any third party mentioned in the Whistleblowing Report is protected. It shall also adopt the necessary technical and organizational measures to prevent access thereto by non-authorised subjects.

The Whistleblowing Report and, to the extent known, the identity of the Whistleblower who submitted a Good Faith Whistleblowing Report, will not be disclosed to others within or outside Ermenegildo Zegna Group, unless (a) the Whistleblower gives his or her prior written consent, provided that the Whistleblower is entitled to deny or withdraw his or her consent at any time and must be informed of this right prior to giving consent, (b) it is required so in connection with a judicial, regulatory or administrative proceeding (by oral questions, interrogatories, request for information or documents, subpoena, civil investigation demand or similar process), (c) such disclosure is recommended by Ermenegildo Zegna Group's legal counsel (internal or external) in writing in order to comply with a law or to defend the Ermenegildo Zegna Group rights in legal proceedings.

In any case, the disclosure of the Whistleblowing Report and/or of the identity of the Whistleblower who submitted a Good Faith Whistleblowing Report (whenever it is allowed under the conditions of the preceding Section) shall be carried out on a strict need-to-know basis and in compliance with rigorous standards of prudence, temperance, proportionality and confidentiality. In this regard, the Ethics Committee may decide to blacken those data which are not strictly necessary, to use password-protected files, to share a redacted or summarized version of the Whistleblowing Report, depending on the contents and the kind of facts and information reported, on a case-by-case basis.

The Ethics Committee may notify the Concerned Person that concerns have been raised in relation to him or her. In such case, Ermenegildo Zegna Group will make this notification within a reasonable time and take into consideration the interests of the investigation. In such circumstances, disclosure to the Concerned Person may be postponed until such condition of secrecy is no longer needed. The Concerned Person will have the opportunity to respond and address the concerns that have been raised in relation to him or her. Ermenegildo

Zegna Group will take all reasonable measures to prevent the Concerned Person from learning the identity of the Whistleblower.

If it is determined that the Whistleblower Report was not a Good Faith Whistleblowing Report, Ermenegildo Zegna Group shall not be bound by the confidentiality undertakings described in this Section 4.6, subject to any applicable privacy laws and regulations. Only information for which local or internal regulations require it to be stored will be archived.

Records regarding Good Faith Whistleblowing Report will be maintained and stored as per applicable laws.

#### **4.7. PROTECTION**

No Whistleblower who submits a Good Faith Whistleblowing Report (as well as no Protected Person) will suffer harassment, retaliation, intimidation, reputational damage, unfavourable treatment, discrimination, or any other adverse (including employment-related) consequences as a result of raising a Good Faith Whistleblowing Report.

Ermenegildo Zegna Group will not tolerate any form of the foregoing actions or behaviours and will take (disciplinary) actions against any person doing or engaging in such conduct, where appropriate.

An Employee or an Other Interested Party who believes he or she has suffered retaliation because of his/her Whistleblower status or due to his/her participation in the investigation of a Whistleblowing Report, is encouraged to immediately report such conduct to his or her manager or relevant HR representative or to the Ethics Committee to allow Ermenegildo Zegna Group to take appropriate measures.

Ermenegildo Zegna Group may only take disciplinary actions against a Whistleblower in relation to a Whistleblowing Report if Ermenegildo Zegna Group concludes that a Whistleblowing Report is a Bad Faith Whistleblowing Report.

If it is determined that the Whistleblower has been personally involved in Misconduct, reporting such Misconduct does not exempt the Whistleblower from possible actions (including disciplinary measures) by Ermenegildo Zegna Group or civil, criminal or regulatory liability. In its actions, Ermenegildo Zegna Group will, however, take into consideration if a Whistleblower has voluntarily submitted a Good Faith Whistleblowing Report.

#### **4.8. ESCALATION TO AUDIT COMMITTEE OF THE BOARD FOR ACCOUNTING, INTERNAL CONTROLS OR AUDITING MATTERS**

Whistleblowing Reports relating to accounting, internal controls or auditing matters, as determined by the Ethics Committee, shall be communicated to the Audit Committee of the Board for consideration at the next scheduled meeting of the Audit Committee. The internal audit department will provide original copies or records of all communications relating to such Whistleblowing Reports to the Audit Committee of the Board. However, depending on the length and number of communications received, the internal audit department may provide only a summary of the communications along with the original copy or record of any communications deemed particularly important. The original copies or records of all communications will be available to any member of the Audit Committee of the Board upon request. The Company Secretary will maintain a log of each communication received by the Audit Committee of the Board, the date such communication was distributed to the Audit Committee and whether it was distributed in summary or original form.

The Audit Committee of the Board will determine whether any action or response is necessary or appropriate in respect of a Whistleblowing Report relating to accounting, internal controls or auditing matters. If so, the Audit Committee of the Board will take or direct the Ethics Committee to take such action as it deems appropriate. The Ethics Committee or any other person designated by the Ethics Committee will report on the status of any further action directed by the Audit Committee of the Board at least on an annual basis.

The determinations of the Audit Committee of the Board in respect of Whistleblowing Reports relating to accounting, internal controls or auditing matters and any further action taken will be recorded in the log maintained by the Company Secretary, under the direct control of the Audit Committee of the Board.

## 5. EXTERNAL CHANNELS

Employees and Other Interested Parties are encouraged to submit Whistleblowing Reports using the Reporting Channels set forth in this Policy. However, there are also external reporting options, which Whistleblowers can use if the conditions set forth in the relevant local applicable laws are met.

Given the possible severe consequences provided by law in case of external reporting, Employees and Other Interested Parties are encouraged to seek advice before reporting any concern outside Ermenegildo Zegna Group.

In the Netherlands, Employees and Other Interested Parties can also consult the advisory department (*afdeling advies*) of the Institute for Whistleblowers (*Huis voor Klokkeluiders*). For more information regarding the Institute for Whistleblowers and its procedures, please consult the website: <http://www.huisvoorklokkeluiders.nl>.

## 6. PROCESSING OF PERSONAL DATA

Processing of personal data in relation to Whistleblowing Reports will be carried out in compliance with Regulation EU 2016/679 (the "**Privacy Regulation**") on the protection of natural persons with regard to the processing of personal data and other applicable laws and/or regulations and with any additional mandatory regulations in force in the individual countries in which it will be applied. This means that the processing should at all times be lawful, taking into account the rights of the subjects involved.

The data controller of personal data, referred to in Article 4, paragraph 7 of the Privacy Regulation (the "**Data Controller**") with regards to personal data processed as part of managing Whistleblowing Reports, is the company Ermenegildo Zegna N.V., Amsterdam, parent company of the Ermenegildo Zegna Group. The Data Controller will process personal data also involving subsidiaries and services suppliers, duly instructed and appointed as Data Processors as per Article 28 of the Privacy Regulation.

The data subject is the identified natural person to which the personal data relates to as per Article 4, paragraph 1 of the Privacy Regulation.

In particular, in relation to the management of Whistleblowing Reports, personal data of the Whistleblower, where the report is not anonymous, will be processed to the extent strictly required for the purpose of receipt, processing and management of Whistleblowing Reports, necessary to (i) fulfill of any legal obligations under national or / and U.S. and European laws or regulations and Ermenegildo Zegna Group policies, to which the Data Controller is subject as well as by provisions ordered by Authorities legitimated by the law and / or by Supervisory and control bodies; (ii) perform internal audit activities. The personal data of the subject who is

being reported, such as name, position held, contact details and other personal information, including data belonging to special categories, will also be processed for the same purposes only.

After completing all work and the necessary investigations, personal data are deleted, except for the personal data that will be necessary to process further for the establishment, exercise or defence of legal claims or for compliance with the applicable legal obligation.

Pursuant to Article 29 of the Privacy Regulation, personal data will be processed by persons authorized to process who have been expressly given adequate instructions by the Data Controller regarding the need to guarantee the protection of the personal data of data subjects involved in the report.

Where there is a substantial risk that communicating relevant information will compromise the ability to effectively assess the merits of the Whistleblowing Report or to collect the necessary evidence, the person reported may not be informed of the registration of his/her data, as long as it is necessary to ensure proper management of investigations and in any case in compliance with the provisions in the applicable rules and legislation.

Full information notice on the processing of personal data is provided as Annex B to present document and in accordance with the Privacy Regulation, also through multiple contact channels, such as the technological platform for communication of reports and the internal communication tool.

## 7. ANNEX A - WHISTLEBLOWING CHANNELS

**Web Portal Link:** [zegna.ethicspoint.com](https://zegna.ethicspoint.com)

**Click Connect:** [zegna.ethicspoint.com](https://zegna.ethicspoint.com) (available for countries other than Canada, the US, China and Italy).

**Phone hotline** (available only for Canada, the US, China and Italy):

Country:	Telephone Number:
Canada	833-672-1492
United States	833-672-1492
China	400-120-0302
Italy	800-168-040

## 8. ANNEX B – PRIVACY POLICY

Dear Mr./Ms.,

the undersigned **Ermenegildo Zegna N.V.**, with registered office in **Viale Roma 99/100, 13835 Valdilana (Trivero)**, parent company of the Ermenegildo Zegna Group (hereinafter also referred to as the “**Controller**” or the “**Company**”) informs You that it will process Your Personal Data in its capacity as Data Controller in order to manage the report of circumstances related to unlawful behavior under the European Whistleblowing Directive 2019/1937 (“**Whistleblowing Reports**”), submitted through the internal whistleblowing channels made available by the Company, including written, oral and in-person reporting channels, as better described in the applicable Whistleblowing Policy. For the abovementioned purposes, Your Personal Data, including name, position held, contact details and data belonging to special categories such as those related to health status, religious beliefs and judicial ones, may be processed.

### 1) Method of processing

The processing of Your personal data for the purposes mentioned above is carry out using mainly automated methods (electronic support), in compliance with the rules of confidentiality and security provided for by law, by regulations and specific internal provisions. Personal Data may also be processed through oral reporting channels (including voice reporting systems or telephone hotlines) and, where requested, through in-person meetings, in accordance with the Whistleblowing Policy and applicable data protection laws.

### 2) Purpose and legal basis of the processing

The Data Controller specifies that the information acquired in the context of the whistleblowing channel of communication, including written reporting systems, oral reporting channels (such as voice reporting systems or telephone hotlines) and, when requested by the reporting person, through in-person meetings, will be processed in line with the laws related to the protection of data and confidentiality obligations, for the following purposes (“**Purposes**”): receipt, processing and management of Whistleblowing Reports, necessary to (i) fulfill of any legal obligations under national or / and U.S. and European laws or regulations, to which the Data Controller is subject as well as by provisions ordered by Authorities legitimated by the law and / or by Supervisory and control bodies; (ii) perform internal audit activities.

The legal basis of the processing activities lies in legal obligations of the Company, as well as in the legitimate interest of the latter in (i) investigating any circumstances and behaviors that can result to be not in line with the ethics values of Ermenegildo Zegna Group and the applicable local equal opportunity and discrimination legislation, and (ii) preventing behaviors and criminal offences or granting security of networks and information. If Your local mandatory law does not consider as a valid legal basis the fulfilment of the foreign law and/or legitimate interest of the Company, the latter will request Your prior consent as a basis for the processing of Your personal data.

If, moreover, Your consent is required by the regulation in force in your country for the transfer of your Personal Data across borders, it will be requested before sending the Whistleblowing Report.

### 3) Mandatory or optional nature of the provision of data

The provision of Your data is not necessary; Whistleblowing reports, in fact, can be submitted anonymously. It is recommended therefore to only indicate Data that are extremely necessary for the report and to leave out further data that are not pertinent and excessive. In particular, it is strongly recommended to leave out data belonging to special categories (for instance data related to health, sexual orientation and/or religious beliefs) where not strictly related to the Report.

#### 4) Data retention period

Data related to Whistleblowing Reports will be processed for the time strictly necessary to manage them and for any further activities related to the legal protection of subjects involved and obligations of the Data Controller under the applicable regulation.

#### 5) Categories of recipients who may have access to the data

The categories of recipients listed below may have access to your personal data: (i) service providers (services related to the management of the reports/technological platform), (ii) internal functions and authorized personnel involved in the management of Whistleblowing Reports, including members of the Ethics Committee, Internal Audit, and depending on the nature of the report, the Human Resources and/or Legal functions, duly authorized to process Personal Data; (iii) external consultants (such as technical consultants and lawyers, doctors, etc.) and subjects who are part of Supervisory Board or any other control bodies appointed by the Controller; (iv) companies of the Ermenegildo Zegna Group and related companies as well as supervisory bodies depending on local applicable laws; (v) Authorities, Police Forces, Entities and Public Bodies, for the performance of their respective institutional functions, within the limits established by law and applicable regulations. These parties will act as appointed Data Processors or autonomous Data Controllers.

Your personal data will also be disclosed to the employees of the Data Controller, specifically appointed as authorized subjects, where necessary for the Purposes referred to in Paragraph 3 of the present Policy, who act in the capacity of subjects authorized by the Data Controller to carry out certain activities related to the role covered and to the function they have within the Company's internal structure. The recipients of Your Personal Data shall act in accordance with the instructions provided by the Controller as well as the provisions of the applicable laws respecting security measures, protection and safeguard of data.

#### 6) Data transfer

The data will be processed mainly in Italy, Europe and UK. However, they could also be transferred to countries outside the European Union, including US, always granting adequate protection and safeguard of Data, in accordance with the provision of the European Regulation 2016/679 (hereinafter also referred to as the "**Privacy Regulation**"), through the use of the Standard Contractual Clauses approved by the European Commission and through further safeguards, as set out in Art. 45 ss of the Privacy Regulation. It is however always possible to contact the Data Controller to obtain further information related to the location of Your Data.

Your data will not be disseminated in any way.

#### 7) Rights of the data subject

Art. 15, 16, 17, 18, 20 and 21 of the Privacy Regulation grant you several rights, including the right: (i) to access to Your personal data, to obtain information about the data processed, the purposes and methods of processing; (ii) to obtain the rectifications and updating of data, (iii) to request the deletion or restriction of the processing of Your data; (iv) to object to the processing of Your data for legitimate purposes as well as to exercise Your right to data portability and deletion, where possible; (v) to withdraw Your consent previously given.

To exercise these rights, you may contact the Data Controller at the above-mentioned address, for the attention of the Legal Department or by writing to the Data Protection Officer at [privacy@zegna.com](mailto:privacy@zegna.com). Please note that the Data Controller reserves the right, within the limits of the applicable law, to restrict the above-mentioned rights in order to comply with the applicable reporting legislation and to protect both the identity and confidentiality of the reporting party.

Please also note that it is always possible to lodge a complaint with the competent Supervisory Authority if You believe that the processing of Your Personal Data violates privacy legislation. To facilitate the exercise of the right to complain, the name and contact details of the EU Supervisory Authorities are available at the following link: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).