

# Ermenegildo Zegna Group

## **OCCUPATIONAL AND HEALTH AND SAFETY POLICY**

(as adopted on December 19, 2024)

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## **1. INTRODUCTION AND PURPOSE**

Ermenegildo Zegna N.V. along with its subsidiaries and associates<sup>1</sup> (hereafter the “**Group**”) is committed to organizing and maintaining safe and healthy workplaces that comply with health and safety laws, regulations and standards (collectively “**OHS Laws**”) in all the countries in which the Group operates.

The purpose of this Occupational Health and Safety Policy (the “**OHS Policy**” or the “**Policy**”) is to establish a framework for the health and safety of all employees, customers, visitors, suppliers and contractors.

The Group promotes a safety-oriented culture built on the values of and awareness of the risks involved in its workplace’s activities, as embedded in its Group Code of Ethics.

The Group recognizes the importance of employee insights in fostering a healthy and responsible corporate culture and in maintaining a healthy and safe working environment for its stakeholders, such as customers, visitors, suppliers and contractors.

This Policy should be read together with other relevant policies, including but not limited to the Group Code of Ethics, the Misconduct Reporting Policy, the Human Rights Policy, the Environmental Policy and Chemical Management Policy and the Supplier Code of Conduct.

## **2. SCOPE OF APPLICATION**

This Policy applies to all business activities carried out by Ermenegildo Zegna N.V. and its subsidiaries and associates in the various types of premises, including production facilities, offices, warehouses and stores.

The Group expects employees at all levels to act responsibly and to respect the safety system adopted and the procedures that form part of it. Employees, collaborators and any other parties who enter the Group’s premises for any reason are called upon to contribute towards maintaining the safety and quality of the workplace environment. The Group is committed to distributing this Policy widely to raise awareness of its contents.

The Group expects suppliers and contractors to adhere to the principles of this Policy. Additionally, suppliers and contractors are required to adhere to the Supplier Code of Conduct which recalls compliance with applicable OHS Laws, as well as the adoption of safety protocols for safe and healthy work environments for their employees.

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<sup>1</sup> Ermenegildo Zegna Group refers to the company 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. IMPLEMENTATION AND APPROVAL OF OHS POLICY**

This Policy has been adopted by Ermenegildo Zegna N.V. as of December 19, 2024, through approval by the Group Chairman and Chief Executive Officer. It shall be considered the document of reference for occupational, health and safety management matters by Ermenegildo Zegna N.V. and its subsidiaries and associates.

The Group Health, Safety and Environment (HSE) function is responsible for the implementation of this Policy. This includes developing a health and safety plan with the Top Management of each of the Group's entities and ensuring that the OHS Policy is regularly updated to reflect evolving regulations and best practices with the support of the Group Compliance & Risk management function.

Top Management is fully committed to leading by example and fostering a culture of health and safety within the organization.

Managers and supervisors at all levels are responsible under this Policy for the persons reporting directly to them. They oversee the correct application of safety procedures by their teams, address any inappropriate behaviors by their team members and respond to their concerns to ensure a culture of safety.

All employees are encouraged to participate actively in occupational health and safety initiatives. The Group consults and collaborates actively with workers' representatives where required by local OHS Laws, and holds meetings with them where scheduled.

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

### **4. GROUP COMMITMENT TO OCCUPATIONAL HEALTH AND SAFETY IN WORKPLACES**

The Group is committed to complying with all relevant OHS Laws to prevent accidents, incidents, injuries or occupational diseases in the workplaces and to reduce risks across its business operations by focusing on preventive metrics, including near misses, unsafe acts and unsafe conditions. This includes local laws and regulations such as the Italian Legislative Decree No. 81/2008, the Swiss Labor Law and Accident Insurance Law, the Turkish Occupational Safety and Health Law No. 6331 and any other similar OHS laws in other jurisdictions in which the Group operates.

The Group is committed to ensuring that workplaces prioritize the health, safety and well-being of employees. To uphold this commitment, the Groups strives to:

- Reduce workplace injuries and occupational diseases by implementing preventive safety measures and educational and informational programs;
- Create a culture of safety that empowers everyone to take responsibility for their own safety and the safety of others;
- Promote physical and mental health by ensuring a safe work environment and encouraging healthy behaviors, also through initiatives for stress management and work-life balance.

Furthermore, the Group is committed to implementing an occupational health and safety management system that adheres to internationally recognized standards such as ISO 45001 in premises where it is feasible.

## **5. COMPLIANCE PROGRAM**

Compliance with this Policy is essential as non-compliance – whether direct or indirect – can result in significant legal issues such as fines and criminal, administrative and civil proceedings against the Group entity involved, as well as the employer. Additionally, it may lead to reputational harm, affecting stakeholder trust and potentially resulting in financial losses.

The Group HSE function plans and conducts regular risk assessments to identify potential hazards and determine the actions or controls necessary to reduce risks in the workplaces. These actions include health surveillance, safety training and awareness campaigns including emergency and first aid procedures, reporting of hazards and contributing to discussions on safety improvements, also with the assistance of external experts.

The Group HSE function monitors compliance with applicable OHS Laws and verifies the effectiveness of the safety measures implemented. These assessments can be conducted by internal personnel with specific expertise in safety matters or by accredited external firms. Additionally, the Group Internal Audit function conducts audits to verify compliance with this Policy.

The Group requires its suppliers and contractors who carry out activities or provide services on the Group's premises to provide documentation of safety measures as part of the supplier and contractor qualification process. Additionally, suppliers and contractors who have access to the Group's operations are required to follow the specific provisions and procedures related to health and safety adopted by local operations. In the event of any violations by suppliers or contractors, the relevant Group company reserves the right to terminate or revoke the assignment.

## **6. OBLIGATIONS OF EMPLOYEES AND DISCIPLINARY ACTIONS**

All employees, regardless of their location or position, and all suppliers working on Group premises, have the following obligations:

- Comply with all applicable OHS Laws and company procedures and instructions adopted by each premises;
- Take reasonable care to protect their own health and safety as well as that of their colleagues;
- Promptly report any hazards, defects or unsafe conditions to their supervisors;
- Acknowledge and participate in safety awareness campaigns and safety training, as required by local OHS Laws;
- Properly use and maintain any Personal Protective Equipment (PPE), if required;
- Not be under the influence of alcohol or drugs while at work.

Violations of the OHS Policy or OHS Laws may result in disciplinary actions. Depending on the severity of the violation and applicable laws and national collective bargaining agreements, these actions may include but are not limited to:

- Verbal or written warnings;
- Compensation consequences;
- Suspension of work;
- Termination of employment.

Severe breaches, including willful negligence or repeated violations, could also result in legal consequences, including civil or criminal charges, in accordance with local laws and regulations.

## **7. REPORTING 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 OHS laws, regulations and conventions.

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 OHS 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.

## **8. MONITORING AND IMPROVEMENTS**

The Group is committed to continuously monitoring and improving this OHS Policy in line with business developments, emerging best practices and identification of areas for improvement.

The Group recognizes that effective occupational health and safety measures in the workplaces require not only regular assessment of Group's internal procedural framework but also cooperation with external partners, such as local industry associations.