

Ermenegildo Zegna Group

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2023

(as approved on September 17, 2024)

INTRODUCTION

This statement was approved by the Board of Directors of Ermenegildo Zegna N.V. on September 17, 2024, and describes the measures taken by the Ermenegildo Zegna N.V. and its consolidated subsidiaries to ensure the absence of slavery, servitude, forced or compulsory labor or human trafficking within their organizations and along their supply chains, as required by section 54 of the United Kingdom Modern Slavery Act 2015.

The contents of this statement refer to the financial year ended December 31, 2023.

Ermenegildo Zegna N.V. is a Dutch public limited liability company (*naamloze vennootschap*), listed on the New York Stock Exchange (NYSE) since December 20, 2021, and is the parent company of the Ermenegildo Zegna Group (collectively “Ermenegildo Zegna Group”, “the Group”, “we”, “our”, “us”). Ermenegildo Zegna Group is a leading global luxury player, who owns the world-renowned ZEGNA and Thom Browne brands, and operates the TOM FORD FASHION business since April 28, 2023, through an exclusive long-term license agreement with The Estée Lauder Companies Inc. At the Group’s core is a unique *Filiera*, a one-of-a-kind textile platform integrated with state-of-the-art industrial know-how, which brings together the best Italian craftsmanship and innovation to ensure excellence and utmost quality.

We recognize the pivotal role of our people in driving sustainable growth and fostering a positive societal impact. Our commitment to environmental, social, and governance principles is integral to our DNA. We promote and protect the respect of human dignity, oppose all forms of discrimination, and combat child labor and modern slavery in every country where we operate, avoiding all forms of exploitation. We work closely with our suppliers, requiring them to adhere to our ethical standards, to enhance compliance with applicable law and to ensure that their workforce, including subcontractors, is treated with respect and dignity.

OUR BUSINESS ACTIVITIES

The Group designs, manufactures, markets and distributes luxury menswear, footwear, leather goods and other accessories (such as eyewear, cufflinks and jewelry) under the ZEGNA, Thom Browne and TOM FORD FASHION brands, luxury womenswear under the Thom Browne and TOM FORD FASHION brands and childrenswear under the Thom Browne brand. We are present in all major markets (approximately 85 countries around the world) through:

- the direct-to-consumer channel, consisting of single-branded stores managed directly by us, or directly operated stores, outlets, concessions within department stores, as well as directly managed online boutiques and other e-commerce platforms through which we sell directly to our customers. As of December 31, 2023, the three brands retail through 390 stores, of which 253 are directly operated by ZEGNA, 86 by Thom Browne, and 51 by TOM FORD FASHION.
- the wholesale channel, represented by franchisees, specialty stores, department stores and online retailers. As of December 31, 2023, we have 246 wholesale mono-brand stores: 151 for ZEGNA, 25 for Thom Browne and 70 for TOM FORD FASHION.

As of December 31, 2023, the Group has a total of 6,925 employees, representing a 14.8% increase in the number of employees excluding temporary staff from 6,030 at the end of 2022.

The Group welcomes an open dialogue with all its employees and continues to foster a positive and constructive relationship with them. In the past, we have not experienced any material job action or labor stoppage that has had a material impact on our business.

Additional information on Ermenegildo Zegna Group is publicly available online on our corporate website (www.zegnagroup.com).

OUR SUPPLY CHAIN

The Group's business model includes a commitment to vertical integration. The full verticalization of our supply chain, supported by Italian manufacturing predominantly, is a key competitive advantage for us. Our *Filiera* allows us to focus on innovation and research of the highest performing, high-quality textiles. Our *Filiera* also performs important research on the modularization of our manufacturing process in an effort to increase flexibility and efficiency.

Through our long-term relationships with our suppliers, we enjoy privileged access to the procurement of the finest fibers, yarns and fabrics, and we are able to ensure enhanced traceability and quality control of the raw materials.

We manage the entire production process (including the final stages of fabric making and manufacturing) throughout its life cycle, regardless of if it is being handled in-house or through our network of trusted, long-standing external manufacturers. Specifically, the Group's production facilities are located in Verrone, Italy, for knitwear; San Pietro Mosezzo, Italy for formal jackets and suits; Parma, Italy, for outerwear and leather accessories; Mendrisio, Switzerland, for jackets, suits, and shirts; and Turkey, for shirts. Each facility produces both ready to wear and Made to Measure products. For those products or categories that are not manufactured internally, each brand of the Group relies on a selected network of external longstanding suppliers. We acknowledge the impact our operations may have on local communities and society in general. Through dialogue and collaboration, the Ermenegildo Zegna Group seeks to understand community concerns when making strategic decisions.

Regarding external productions, the Group's tier 1 suppliers are defined as suppliers that transact directly with the Group, such as finished-goods manufacturers (e.g., cut and sewn facilities). Tier 1 suppliers also include yarn manufacturers, fabric manufacturers, tanneries and other providers of semi-finished products and production services (e.g., dye houses, washing facilities, sundry manufacturers and embroiderers), for both prototyping as well as industrial productions.

The sourcing of the Group is predominantly concentrated on Italian suppliers, which represent around 85% of our total spending, whereas suppliers from the rest of Europe and from Japan account for a combined 11% of our spending. All our suppliers are selected based on their degree of specialization in specific raw materials manufacturing and production processes. This is a testament to our commitment and long-term efforts to purchase only the finest raw materials and fabrics from selected suppliers.

Suppliers beyond tier 1 are the key direct suppliers to our tier 1 suppliers. Currently, we have only partially identified suppliers beyond tier 1. In some cases, tier 1 suppliers of an entity belonging to the Ermenegildo Zegna Group may be a "beyond tier 1" supplier for another Ermenegildo Zegna Group entity.

GOVERNANCE

The Group believes in and complies with the principles and values of legality, integrity, equality and impartiality, transparency, fairness and reliability, professionalism, confidentiality and human rights, health and safety, environmental protection, and fair competition.

The Group takes a cross-functional approach to governance over human rights, which is integrated into its overall sustainability governance structure. Specifically, human rights governance involves various

functions, operating independently at the brand level, including Human Resources, Diversity Equity & Inclusion (DE&I), Procurement, Sustainability, Compliance and Risk, and Internal Audit.

The Audit Committee, composed exclusively of independent Directors of Ermenegildo Zegna N.V., is responsible for assisting and advising the Board of Directors in the oversight of, among other things, the Group's compliance with legal and regulatory requirements, the design and operation of the internal risk management and control system, risk assessment guidelines and policies, and the steps taken to monitor and control such risks, as well as the effective implementation of the Group's ethics and compliance program.

The Governance and Sustainability Committee, composed of a majority of independent Directors, advises and assists, among other things, the Board of Directors on sustainability policies and oversees the integrity of the sustainability report which details the Group's social commitments and approach to supply chain management.

RESPONSIBLE BUSINESS PRACTICES AND POLICIES

The Group promotes and safeguards the respect of human dignity and opposes all forms of discrimination based on age, gender, sexual orientation, personal and social condition, race, language, nationality, political opinion, trade union membership and religious belief. The Group respects human rights and guarantees employment founded upon principles of dignity and respect and without any form of coercion, mistreatment, abuse or corporal punishment.

Human resources are indispensable to the existence and future development of the Group. Human resources management aims to improve the abilities of each employee, including through training courses and development activities. Working conditions are designed to ensure that employees perform their duties in a climate of collaboration, respect and calm. In order to guarantee full respect for the individual, the Group is involved in the fight against child labor in each of the countries it operates. The Group has adopted a Code of Ethics, applicable to all stakeholders and prohibiting all forms of exploitation of child labor.

The Group has also adopted a Code of Conduct for Suppliers, which is a set of standards that at a minimum must be applied to the production facilities of all suppliers, and requests direct suppliers to guarantee that their subcontractors and suppliers also comply with the Code.

The Group shares with its suppliers a commitment to high ethical standards, including the respect of human rights. In particular, the Group requires external suppliers to comply with regulations and with national and international conventions relating to matters including:

- Hours of work;
- Prohibition of harassment, abuse and discrimination;
- Prohibition of child labor;
- Freedom of association;
- Employment contracts, compensation and benefits;
- Health & safety; and
- Workplace conditions.

The Group requires its suppliers to accept and adhere to the principles of the Code of Ethics and other relevant policies. Suppliers must also sign the Code of Conduct for Suppliers which requires them to accept audits. In the event of a breach of the Code of Ethics, Code of Conduct for Suppliers, or any relevant policies, the Group may terminate the relationship with the supplier. The Code of Ethics is published on our website [here](#).

The Group fosters an open culture and emphasizes the importance of employees and other interested parties raising any concerns to assess, investigate and gather additional information if required. To support this, the Group has adopted a Misconduct Reporting Policy that encourages everyone working for, or with, the Group to report any misconduct confidentially and without fear of reprisals. To facilitate the receipt of whistleblowing reports, the Group provides a web portal and a dedicated phone line as a communication channel. Both are available in multiple languages and are hosted by an independent supplier, accessible 24 hours a day, seven days a week. Under the Misconduct Reporting Policy, employees and other interested parties who wish to report misconduct (i.e., “whistleblowers”) can file a misconduct report through one of the channels of communication mentioned above. Employees can also seek advice and/or report the alleged misconduct to their immediate supervisor or relevant HR representative. The Misconduct Reporting Policy is available [here](#).

SUPPLY CHAIN DUE DILIGENCE PROCESS

The Group maintains long-term relationships with its suppliers, not only to ensure the procurement of the finest fibers and fabrics but also to create value through ongoing sharing of technical and quality control improvements, as well as investing in the same material certification schemes.

To strengthen the collaborative approach with its suppliers, in 2023 the Group adopted an open vendor management software platform to facilitate the exchange of information, data and documents among parties. This software platform solution enhances the monitoring of suppliers' performance on different aspects, including compliance with legislation and policies, in terms of both sustainability and risk management.

The Group has a social and environmental compliance program for suppliers, to monitor significant, actual and potential impacts along the supply chain. The program includes audits (through independent third-party auditors) of our suppliers to monitor their social and environmental performance, and their compliance with local legislation and with our Code of Conduct for Suppliers. The audits follow a checklist that includes internationally recognized standards and regulations (e.g., International Labor Organization recommendations, UN Universal Declaration of Human Rights, ISO 14001, etc.). The checklist includes 188 requirements across different areas (employees, health & safety, environment, supply chain), tailored according to the category of supply.

When planning yearly audits, the Group conducts a risk analysis on its supplier base, assigning each supplier a score based on quantitative criteria to identify strategic suppliers (e.g., relevance to the Group, product category, dependence from the Group, geography, etc.).

In 2023, we audited 45 raw materials and finished-product suppliers. This number corresponds to 17% of 2023 relevant tier 1 suppliers. During the FY 2023 audits, 24 priority non conformities out of a total of 7,896 checkpoints were found on 14 suppliers, which represents 37% of suppliers audited. The non-conformities found at these suppliers' production sites were related to employees and health & safety aspects. As to the severity of the issues, no zero-tolerance non-conformities (e.g., potential child labor and forced labor issues) were found. All non-conformities detected were addressed by requiring the affected sites to draw up a corrective action plan, corresponding to a corrective action rate equal to 100%. Our Internal Audit department monitors the implementation of the corrective actions, with specific attention to detecting priority non-conformities. Based on the results of the audits, no supplier relationship was terminated during 2023.

With regard to due diligence processes aimed at verifying respect of human rights at work, in our corporate premises and in the relationships with employees, clients and communities, the Group uses different operational tools (e.g., surveys, internal communication channels and a whistleblowing system)

and conducts periodic audits. Additionally, our HR policies and commitments promote work-life balance and general well-being of employees. More than 62% of our employees are covered by collective bargaining agreements. These regulate relations between employers and workers and facilitate agreements on working conditions.

TRAINING

We actively engage with partners who share our commitment to responsible business practices. Building a strong and long-lasting relationship with our suppliers is at the core of our strategy. We maintain regular communication with our suppliers and over the years we have built a collaborative approach based on mutual trust and mutual sharing of knowledge to drive innovation. We engage with our suppliers in the development of materials and product standards, and we actively involve them in projects to foster responsible practices along our value chain.

In 2023, the Group started an awareness campaign promoting the adoption of behaviors compliant with the Code of Ethics across the organization. As part of this initiative, employees are requested to inform third parties with whom they have business dealings about the relevant provisions of the Code of Ethics. Additionally, an awareness-raising campaign was conducted for the Misconduct Reporting Policy, which was followed by compulsory training for all employees.

Relevant functions in the Group are also trained on the principles and requirements of our Code of Conduct for Suppliers, to increase the internal knowledge and awareness of relevant topics for the Group, such as social and environmental issues.

During 2023 the Group has also provided training on the vendor management software platform to internal teams and suppliers involved in the pilot project.

The Group offers training and performance review programs to employees, and an induction program for new hires that is a comprehensive onboarding program with the goal to provide a holistic and insightful introduction.

Training on specific topics, such as health and safety aspects, is mandatory for all new joiners and updates are provided periodically and when there are changes in legislation.

LOOKING AHEAD

The Group is committed to continuously identifying opportunities for improvement and strengthening systems and controls to ensure respect for human rights throughout the supply chain. This includes regularly assessing the adequacy of our procedural framework. Additionally, the Group is consistently reviewing and optimizing its suppliers to further minimize its risk profile.

In 2024, our control activities will continue to effectively monitor and mitigate risks associated with supply chain management. Specifically, the Group plans to further increase the number of direct suppliers' sites and their subcontractors' and suppliers' sites, audited by third-party entities.

During 2024, the Group will broaden the rollout of the vendor management software platform to include relevant tier 1 suppliers and will continue delivering adequate training to our partners. Lastly, through this tool and other possible solutions currently under evaluation, the Group aims to complete the mapping of its extended supply chain.

We will also maintain essential training programs to foster a corporate culture focused on respect for human rights and sustainability issues. Moreover, we will keep delivering relevant trainings to all internal functions involved in direct relationships with our suppliers.

Signed by Ermenegildo Zegna di Monterubello – Chairman and Chief Executive Officer of the Ermenegildo Zegna Group on September 17, 2024.