



HUMAN RIGHTS PROTECTION POLICY OF THE TOD'S GROUP

Approved by the Board of Directors of Tod's S.p.A. on 06/09/2023

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I. SCOPE

The Human Rights Protection Policy of the TOD'S Group¹ (hereinafter the “Group” or “TOD'S”) has been developed with a view to fostering the promotion and dissemination of fundamental human rights and with the commitment to support and adopt responsible business management at all levels of the value chain, while respecting and contributing to the protection of individual rights, health and safety and people's well-being. The Human Rights Protection Policy (hereinafter referred to as the “Policy”) was also drafted with the aim of promoting the principles of governance and social sustainability that have always guided the Group in the transparent and responsible performance of its activities in line with the Code of Ethics, the Supplier Code of Conduct, the Sustainability Policy and the Policy for the Protection of Diversity, Equity and Inclusion.

In order to further strengthen its commitment, TOD'S has adhered to the ten principles of the UN Global Compact², contributing to the achievement of the sustainable development goals (SDGs) of the UN 2030 Agenda.

2. RECIPIENTS

The recipients of this Policy are the corporate bodies, employees (without exception), contractors (including but not limited to consultants, agents, representatives, brokers, etc.), and anyone who works with TOD'S Group companies in any capacity.

The Group's main internal and external stakeholders, including employees, customers, suppliers and external laboratories, shareholders, investors and the financial community, territory and community, media and influencers, the Public Administration, governmental and supervisory bodies, schools, universities, design institutes and industry associations, are taken into account in the drafting and application of this Policy.

¹ TOD'S Group means parent company TOD'S S.p.A. and its subsidiaries

² These include: I - Promoting and respecting universally recognised human rights within its respective spheres of influence; II - Ensuring that it is not complicit, even indirectly, in human rights abuses; III - Upholding the freedom of association of workers and recognising the right to collective bargaining; IV - Working towards the elimination of all forms of forced and compulsory labour; V - Working towards the effective elimination of child labour; VI - Working towards the elimination of all forms of discrimination as concerns employment and professions.

3. STATUTORY FRAMEWORK

This Policy is aligned with and draws inspiration from the main national and international human rights laws and regulations, including:

- The United Nations (UN) International Charter of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- The Fundamental Conventions of the International Labour Organisation (ILO);
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work;
- The UN Guiding Principles on Business and Human Rights;
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises;
- The principles of the United Nations Global Compact;
- The United Nations Sustainable Development Goals (SDGs);
- Italian Legislative Decree 231/2001 “Administrative liability of companies and entities”;
- EU Directive 2014/95 on non-financial reporting (EU Directive 2022/2464 - on corporate sustainability reporting - CSRD);
- The European Commission’s Proposed Corporate Sustainability Due Diligence Directive (CSDD).

This Policy is integrated into the Group’s overall procedural system, which includes amongst its various components:

- Code of Ethics;
- Supplier Code of Conduct;
- Sustainability Policy;
- Policy for the Protection of Diversity, Equity and Inclusion;
- Occupational health and safety policy;
- Policy for philanthropy, solidarity and community support initiatives;
- Anti-Corruption Policy;
- Whistleblowing Policy (Whistleblowing Channel);
- Organisation, Management and Control Model of Tod’s S.p.A., pursuant to Legislative Decree 231/2021.

4. RESPECT FOR AND PROMOTION OF HUMAN RIGHTS

The TOD'S Group promotes the spread of a culture of respect for human rights by promoting management based on the principles of fairness, integrity and respect, which it considers to be essential and necessary values in both internal relations and in relations with third parties.

By adopting this Policy, the Group reaffirms its commitment to supporting the protection of human rights, acting in accordance with the Principles described below:

4.1. Child Labour

The TOD'S Group does not tolerate any form of child labour and therefore undertakes not to involve individuals below the minimum age required by law and local regulations.

TOD'S opposes the use of any form of child labour in its business activities. The Group prohibits the employment of minors who are under 16 years of age or who have not reached the age for the completion of compulsory education. TOD'S also prohibits the involvement of young workers under the age of 18 in hazardous work or difficult working conditions, such as long working hours or working at night.

4.2. Forced Labour

The TOD'S Group is strictly against the utilisation of involuntary labour, along with any form of forced or compulsory labour, imprisonment, slavery, indentured servitude or human trafficking.

The Group expresses a sense of responsibility towards (and pays particular attention to) the most vulnerable workers, such as domestic or international migrants or illiterate workers, as they are more exposed to such risks.

4.3. Non-discrimination

TOD'S combats any kind of discrimination on the basis of sex, race, skin colour, ethnic or social origin, genetic characteristics, language, religion or personal convictions, political or any other opinion, membership in a national minority, wealth, birth, disability, age or sexual orientation.

For the TOD'S Group, the promotion of diversity, equity and inclusion is a transversal principle that goes beyond the purely business context. In particular, the Group intends to promote messages of acceptance and diversity, freedom of expression, the repudiation of any form of discrimination and

the promotion of inclusivity as a form of enrichment, integrating them into its own culture and relationships with the communities in which it operates.

4.4. Working Conditions

TOD'S strictly prohibits all illegal conduct or any form of abuse, threat, or hostility to persons or to company property in the workplace.

Respect for the personal dignity of each individual is a fundamental value for the Group and under no circumstances are episodes of physical, sexual, psychological or verbal threats or abuse tolerated. All forms of coercion, pressure, threat, corporal punishment, intimidation and exploitation are strenuously prohibited.

Any implementation of disciplinary measures and fines shall comply with applicable law; such fine amounts shall not exceed universal standards applicable to human rights, and shall not be excessive in nature.

4.5. Freedom to Unionise; Right to Collective Organisation and Bargaining

The TOD'S Group respects and guarantees workers the right to collective bargaining and the right to form and join trade union organisations of their choice, and also undertakes to respect and protect workers' representatives and facilitate an open dialogue with them and with all employees. TOD'S also provides employee representatives with the information necessary for constructive collective bargaining.

4.6. Compensation and Benefits

The TOD'S Group defines its employee remuneration system on the basis of a series of criteria, including the characteristics of the role, the responsibilities assigned and the skills of the individual, paying particular attention to acting impartially, ensuring equal opportunities and meritocracy, far from any discriminatory approach.

In the countries where the Group operates, employees are entitled to receive remuneration at least equal to the minimum wage set forth by law or in accordance with collective labour agreements, whichever is higher, also with reference to overtime and benefits, with the aim of ensuring that

employees can meet their basic needs and live a free and dignified existence, for themselves and their families.

4.7. The Work Day

The TOD'S Group guarantees working conditions that respect personal well-being, recognising the right to rest and leisure as well as the need for everyone to strike the right balance between work and private life.

The Group complies with applicable laws, regulations, and collective-bargaining agreements in terms of the workday and overtime pay, including breaks, rest periods, holidays and various other types of leave. Overtime shall be voluntary. Overtime hours shall be paid pursuant to provisions of applicable statutes and regulations. Should legislation be silent on the matter or afford lesser protection, overtime pay must in any event be paid at a rate higher than base pay.

Should national legislation be silent on such matters or provide lesser protection, the work week (including any voluntary overtime) shall not exceed sixty (60) hours.

4.8. Occupational Health and Safety

As stated in the Occupational Health and Safety Policy, the TOD'S Group promotes compliance with the strictest local and international standards and regulations.

The Group spreads a culture of health and safety in the workplace at its own sites and in those of its supply chain, working to ensure that there are safe environments, workplaces and processes for every worker.

Aside from meeting the legal obligations associated with its business, the TOD'S Group undertakes:

- to ensure safe and healthy workplaces and provide Personal Protective Equipment in order to prevent occupational accidents and illness;
- to adopt a preventive approach with a view to eliminating significant hazards, reducing risks and taking advantage of opportunities to safeguard occupational health and safety;
- to involve workers and their representatives, favouring their participation to boost awareness of risks while also promoting responsible conduct;
- to spread a culture of health and safety by developing the skills required to carry out work activities and organising specific training and instruction plans.

4.9. Privacy

The TOD'S Group is committed to safeguarding the right to privacy and the protection of the data and personal information of all persons involved in its activities, in the strictest compliance with current privacy legislation, in the countries in which it operates.

5. DISSEMINATION, TRAINING AND REPORTING SYSTEM

5.1. Dissemination, training and method of application

The TOD'S Group promotes the broadest possible circulation of this Policy through the use of informational, training, and awareness-raising tools with respect to its content.

All the Recipients of this Policy are required to be familiar with its content, contributing, insofar as each is responsible, to ensuring compliance with it.

Furthermore, the Group is responsible for keeping this Policy updated over time and for disclosing and disseminating any amendments to the Recipients.

This Policy is also made available through publication on the company website at www.todsgroup.com.

With the aim of increasing accountability towards its stakeholders, TOD'S is committed to reporting on its human rights protection performance within its sustainability reporting processes and tools, made available to stakeholders on the corporate website.

In order to ensure compliance with this Policy, the Group promotes risk assessment activities and control and monitoring initiatives, with a view to actively assessing and avoiding potential human rights issues within its operations.

5.2. Reports, violations and penalty system

All Recipients, should they become aware of any suspected violation of this Human Rights Protection Policy or of any behaviour that does not comply with the rules of conduct adopted by the Group Companies, must provide information through the dedicated IT platform, available at the following link: "<https://areariservata.mygovernance.it/#!/WB/tods>".

Roles, procedures and responsibilities concerning the whistleblowing system are defined within the "Whistleblowing Management (Whistleblowing Channel)" procedure, which should be referred to for the details.

Any violation of the provisions set forth herein may constitute a violation on the part of TOD'S Group Company employees of their employment relationship and/or a disciplinary infraction, with all attendant legal consequences, including in terms of keeping their job, and may give rise to a claim for damages arising from such violation.

With reference to any third party, any breach of the provisions contained in the present document may lead to serious consequences, including contract performance being tolled and/or contract rescission or termination for breach, as well as a restriction against any commercial interactions with TOD'S Group, without prejudice to any claim for damages relating thereto.

6. APPROVAL AND UPDATES

The present Human Rights Protection Policy has been approved by the Tod's S.p.A. Board of Directors.

The Companies belonging to the TOD'S Group have adopted the Policy by resolution of their respective Governing Bodies, adapting it as needed to their particular needs and local customs in accordance with the principle of managerial independence.

Any change and/or update to the same shall be approved by the same body, and promptly provided to all Recipients.

7. CONCLUSIONS

This document has been drafted in accordance with the principles and rules established in the Group's Code of Ethics, and in other official documents, which delve further into the issues discussed herein.