

# HUMAN RIGHTS POLICY

**GOLDEN GOOSE**



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GOLDEN GOOSE ★



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# 01 Introduction



As a global luxury brand, Golden Goose Group (hereinafter also referred to as Golden or the Group) is aware of its responsibility towards society and the challenges it is currently facing, with human rights issues standing out amongst the most pressing concerns of our time. Given the significance of such issues and the magnitude of the potential risks involved, Golden Goose is strongly committed to **protecting and promoting human rights** to the fullest extent possible, by preventing any form of complicity in human rights violations and by taking steps to mitigate any adverse impacts that may arise from its operations, both across its supply chain and for the well-being of its people worldwide.

Considering the extent and complexity of human rights issues, the Group has adopted a multi-disciplinary approach to conduct a thorough **assessment of its value chain** to identify the actual and potential risks associated with human rights violations and the **key priority areas** of intervention. This process has also led to the definition of the specific values and principles – as outlined in this Human Rights Policy – that Golden Goose is committed to upholding across the value chain and, hence, are to be respected by all employees and business partners.







## 02 Recipients of the Human Rights Policy



This Human Rights Policy applies to **all Group employees**, regardless of their level or position, and may also extend, in full or in part, to any natural and/or legal person associated with Golden Goose, if deemed appropriate to achieve its purpose and if feasible considering the nature of the relationship.

The Policy also applies to Golden Goose's **suppliers** and **business partners**, as well as their **subcontractors** and any other third party within the value chain, given Golden Goose's commitment to ensuring they all adhere to the same principles and provisions set forth herein, as stated in the Supplier Code of Conduct that they sign as part of their business contract with the Group.







## 03 The 'Golden' approach



In each country of operation, Golden Goose strives to ensure compliance with all applicable national and international laws on human rights, while engaging with local and national public institutions, NGOs, and industry associations to enhance collaboration in upholding and promoting them.

In case of conflict between national laws and the human rights principles upheld by Golden Goose as stated herein, the Recipients are required to adhere to the provisions that provide the highest level of protection of human rights. Should compliance with this Policy violate relevant local regulations or guidelines, Recipients must ensure conformity with the latter while promptly informing Golden Goose.

Golden Goose's approach to human rights is guided by the principles of the main **international standards, regulations, and conventions**, including:

- the United Nations (UN) Universal Declaration of Human Rights (UDHR)
- the International Covenant on Civil and Political Rights (ICCPR)
- the International Covenant on Economic, Social, and Cultural Rights (ICESCR)
- the UN Guiding Principles on Business and Human Rights
- the Conventions of the International Labour Organization (ILO)
- the Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD)
- the Charter of Fundamental Rights of the European Union
- the Italian Legislative Decree 231/2001 (for operations in Italy)
- the UN Convention on the Rights of the Child.

Golden Goose has also embraced the Ten Principles of the **UN Global Compact (UNGC)** and joined the United Nations' call to action on the **2030 Agenda for Sustainable Development**.









### 03.1 OUR COMMITMENT

Golden Goose recognizes the utmost importance of promoting and protecting fundamental human and labor rights in its operations and throughout its value chain. Based on a review of its business model and the expectations of its stakeholders, the Group has identified **10 human rights**, both labor and non-labor related, considered top priority, on which it is focusing its attention and efforts as described below.

Given that other **emerging human rights issues** may become priorities over time due to changes in the internal and external context, Golden Goose will periodically revise and update this Policy and other relevant documents as the human rights landscape continues to evolve.

### 03.2 CHILD LABOR

Golden Goose upholds and respects children's rights and **unequivocally prohibits** the use of child labor, which is defined as any form of work performed by a person younger than 15 years of age, or younger than the minimum age for admission to employment under local laws if this is higher than 15<sup>1</sup> (but not lower than the age of completion of compulsory education).

As part of this commitment, Golden Goose expects its **suppliers** to verify the age of workers prior to hiring them, terminate any employment relationship that does not comply with the aforementioned provisions, and promptly address any other actual or potential Policy violations, bearing in mind that younger employees should never be exposed to hazardous substances or extreme working conditions, including night shifts and/or overtime hours.

### 03.3 FORCED OR BONDED LABOR

Golden Goose rejects and **prohibits any form of forced or compulsory labor**, defined as work that a person is coerced to perform under the menace of a penalty<sup>2</sup>. No employee may be coerced into working by force, intimidation, or retaliation, and all employees must be free to terminate their employment relationship with Golden Goose at any time, without fear of reprisal.

Golden Goose expects the same commitment from its **suppliers**, who must avoid any kind of forced or compulsory labor practices, refrain from requiring workers to pay for their employment (including recruitment costs), and grant them freedom of movement and control over their travel and personal identification documents at all times. Particular attention must be given to the employment of migrant workers, who are at higher risk of forced or bonded labor due to their status, bearing in mind that Golden Goose will not tolerate human trafficking, migrant smuggling, or any other form of modern slavery within its supply chain.



1. As per ILO Conventions No. 138 on Minimum Age and No. 182 on the Worst Forms of Child Labor; the UN Convention on the Rights of the Child; and the Children's Rights and Business Principles developed by UNICEF, the UN Global Compact, and Save the Children.

2. As per ILO Fundamental Conventions No. 29 on Forced Labor and No. 105 on the Abolition of Forced Labor.

### 03.4 DISCRIMINATION AND EQUAL TREATMENT

As stated in Golden Goose's Inclusion & Belonging Act, the Group is committed to **fostering equal employment<sup>3</sup> opportunities** for all and to shaping a work environment where everyone feels welcome and included. In the belief that differences should be valued to create more inclusive organizations, Golden Goose sees uniqueness as an asset. This means that all employees should be able to express their authentic selves, free from any form of discrimination on the basis of gender, sexual orientation, ethnicity, race, origin, disability or medical condition, age, cultural or social background, religion or belief, personal or political opinion, social or marital status, pre-natal, maternity or paternity status, or any other form of diversity.

Golden Goose is committed to providing equal opportunities to everyone wishing to join the Group, and **prohibits discrimination** and bias of any kind at all stages of recruitment and employment. This means that hiring decisions must be based solely on applicants' qualifications and talent, and that all forms of discrimination are strictly prohibited when making any considerations or decisions that affect the employees – be it in relation to training and development, remuneration and benefits (including social security), promotions, disciplinary procedures, termination of employment, retirement, working hours, or task assignments – unless such decisions are dictated by a job's inherent requirements or medically necessary to safeguard the integrity of the employee and respective colleagues.

Additionally, the Group aims to break down any gender barriers that may hinder professional advancement. It also provides dedicated welfare and benefit plans designed to support women in specific circumstances (e.g., pregnancy, breastfeeding, parenthood, etc.) and promotes parenting as a shared responsibility.

To ensure these commitments are effectively translated into actions, Golden Goose engages all its employees in **training and awareness** initiatives. It has also put in place a whistleblowing process, managed by a third party, for reporting and escalating any actual or potential incidents of discrimination, taking appropriate corrective or disciplinary action as needed.



Similarly, Golden Goose expects its **suppliers** to foster inclusive workplaces that reject any form of discrimination, respect individual personalities and distinctive characteristics, value diversity, and ensure equal opportunities at all stages of the employment relationship. Suppliers must strictly prohibit and duly address all discriminatory practices, particularly with regards to recruitment, remuneration, training, career advancement, employment termination, and retirement. Suppliers are also encouraged to implement targeted initiatives providing additional support to women in realizing their professional and personal goals.

3. As per ILO Fundamental Convention No. 111 on Discrimination (Employment and Occupation).





### 03.5 ABUSE, VIOLENCE, AND HARASSMENT

Golden Goose rejects any type of physical, verbal, sexual, or psychological harassment, abuse, offence, threat, unwanted advance, humiliation, intimidation, or punishment in the workplace. Indeed, the Group is committed to ensuring that employees are treated with **dignity and respect** at all times, and hence will not tolerate any form of harassment intended to cause offence or humiliation.

Golden Goose is also committed to ensuring that labor discipline is never maintained through verbal abuse or physical aggression (such as slapping, pushing, kicking, or any other form of physical assault), and will therefore not tolerate the use of intimidation, humiliation, or discriminatory and/or offensive language to enforce it. In the workplace, it is strictly prohibited to impose punishments of any kind, be it a threat or psychological abuse, including, for example, coercing employees to sign letters of self-criticism or publicizing the names of employees facing disciplinary action.

Similarly, Golden Goose expects its **suppliers** to eradicate all forms of workplace harassment, abuse, violence, intimidation, offence or hostility, whether explicit or unspoken, physical, verbal, sexual, or psychological. Suppliers are also required to adopt a **zero-tolerance approach** towards behaviors that go against the aforementioned principles, implementing disciplinary measures as needed.

### 03.6 FAIR COMPENSATION

Golden Goose is committed to providing all its employees with a stimulating and rewarding environment that ensures fair and equitable compensation for their work, through an adequate remuneration package consisting of wages and other benefits. **Employees must be paid for actual hours worked**, including overtime, in accordance with applicable laws and national collective labor agreements, if available and more favorable.

Wages must be commensurate with the employees' level of education, qualifications, experience, and skills, taking into account individual achievements when setting and revising compensation and ensuring full transparency towards employees. The benefits included in the remuneration package may come in the form of bonuses, welfare systems, and other services meant to contribute to the well-being of employees (including access to social security). In any case, wage schemes should guarantee **equal pay for equal work** and eliminate differences in compensation based on gender (i.e., gender pay gaps) or other discriminatory biases.

Golden Goose expects its **suppliers** to ensure that employee remuneration is at least equal to the legal minimum wage or the industry's standard rate, whichever is higher, and that no employee is paid below the **living wage**<sup>4</sup>. The **amount of compensation** must be clearly communicated to employees prior to the start of employment, and stated in writing in the employment contract in a language they understand.

4. Pay for a standard workweek that can adequately cover the worker's basic expenses and allow for some discretionary income.

### 03.7 WORKING HOURS

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Golden Goose recognizes the **employees' right to set working hours**, at least one day of weekly rest, and paid annual leave. It also recognizes their right to adequate rest breaks during the working day and that these should never be denied. Moreover, the Group fosters **work-life balance** to preserve the well-being of its employees, by listening to their specific needs, promoting flexibility (e.g., part-time work), and respecting their right to vacation and leisure time.

Golden Goose ensures compliance with all applicable international, national, and local legal requirements on working hours with any **collective labor agreements** in place. Without prejudice to the different working time limits provided for by law in each country of operation, the standard working week (including overtime) must not exceed 48 hours, with the understanding that overtime and atypical working hours must always be exceptional and fairly compensated.

Golden Goose expects its **suppliers** to comply with all applicable local laws and respect workers' right to appropriate weekly rest and daily breaks. Temporary adjustments to these restrictions may be allowed during seasonal peaks, with the understanding that the employees' normal working hours and regular rest periods must be reinstated as soon as feasible, in line with legal requirements. Whenever possible, employees must be informed at least 24 hours in advance if obligatory overtime becomes necessary.

### 03.8 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

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Golden Goose recognizes and respects the fundamental right of employees to **freedom of association, collective bargaining**, and to be **represented by labor organizations**<sup>5</sup>, and maintains a relationship of mutual recognition, dialogue, and cooperation with trade unions and employee representatives. All employees, irrespective of their position, shall be granted the freedom to establish and join groups and associations of their choice, without prior approval from the Group and without fear of retaliation or disciplinary action.

Relations with trade unions must be guided by the highest principles of transparency and independence, and managed in strict compliance with current laws.

Golden Goose is committed to acting responsibly when managing Group reorganizations involving its activities and/or facilities (including closures, new openings, and restructuring), also by engaging in constructive negotiations with employee representatives as needed.

Golden Goose expects its **suppliers** to respect their workers' right to freedom of association, union membership, and collective bargaining, and to refrain from any kind of retaliation aimed at preventing or discouraging the effective exercise of such rights. Suppliers are also expected to foster open dialogue with trade unions and ensure that employee representatives can perform their functions without fear of reprisal.

### 03.9 OCCUPATIONAL HEALTH AND SAFETY

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As expressly stated in its Code of Ethics and Health and Safety Policy, Golden Goose is committed to **protecting the physical and mental health and safety** of its employees, suppliers, customers, visitors, consultants, and anyone who comes into contact with the Group, in full compliance with the health and safety laws and regulations in force in the countries where it operates.

Similarly, Golden Goose expects its **suppliers** to safeguard the physical and mental health and safety of their workers by ensuring a safe working environment and proper work-life balance. Suppliers should also provide employees exposed to hazardous substances or working conditions with adequate training, safety devices, and personal protection equipment.

5. As per ILO Fundamental Convention No. 87 on Freedom of Association and Protection of the Right to Organise; ILO Convention No. 98 on the Right to Organise and Collective Bargaining; and ILO Convention No. 135 on Workers' Representatives.



### 03.10 FREEDOM OF EXPRESSION, OPINION, AND INFORMATION

Golden Goose is committed to respecting all employees' **right to exercise their freedom of expression**, which includes freedom to hold an opinion without interference and freedom to seek, receive, and impart **information**<sup>6</sup>, thus fostering open dialogue with all stakeholders. The Group regards the diversity of opinions and perspectives as a valuable means to fight bias, promote critical and creative thinking in the identification of solutions, and foster mutual growth. It therefore strictly prohibits all forms of discrimination, intimidation, or retaliation against employees for expressing their political, personal or professional opinion.

Similarly, Golden Goose expects its **suppliers** to foster a work environment that promotes freedom of expression, where workers can express their opinion without fear of judgment or negative impact on their professional career.

### 03.11 LOCAL COMMUNITIES AND MINORITIES

Golden Goose is committed to **contributing to the economic and social development** of the local communities and territories in which it operates, maintaining an open dialogue with the main local stakeholders and representatives to ensure the Group's integration and legitimacy to operate in each jurisdiction.

Golden Goose is also committed to respecting the local cultures and traditions of each country of operation, adapting its business activities to local customs and practices whenever possible. Initiatives in support of local communities must be particularly mindful of listening, protecting, and fulfilling the **needs of minorities and vulnerable groups**, including indigenous populations.

Golden Goose expects its **suppliers** to be respectful of the local communities in which they conduct their business, with particular attention to developing countries and nations where human rights and the environment are at greater risk.



6. As per the United Nations' Universal Declaration of Human Rights.





## 04 Implementation and control



## 04.1 IMPLEMENTATION OF THE POLICY

The protection of human rights is a collective responsibility shared by Golden Goose, its employees, and suppliers. To this end, the Group is committed to promoting active engagement and dialogue with all relevant stakeholders to seek collaborative solutions to shared challenges.

Golden Goose has adopted an integrated approach to identify, assess, and address its actual and potential adverse impacts on human rights. The assessment was carried out by the Sustainability Department with the support of both its main internal stakeholders and an external specialized consultancy firm.

Inspired by the UN Framework and Guiding Principles on Business and Human Rights, the implementation of the provisions outlined in this Policy follows a structured and systematic approach involving the following steps:

- **risk assessments:** risk assessments and socio-environmental audits across the supply chain are conducted on a regular basis to identify, prevent, and mitigate any actual or potential adverse impacts on human rights associated with the Group or its suppliers, with a focus on addressing industry-specific risks
- **mitigation:** appropriate mitigation measures are implemented to address any human rights risks identified and reduce their impacts, including grievance mechanisms to report concerns regarding potential non-compliances
- **monitoring:** adequate monitoring mechanisms, including self-assessment questionnaires and on-site audits, are implemented to verify compliance with Golden Goose's commitments to human rights by all suppliers and business partners
- **communication:** accurate information on the main risks identified and on the mitigation measures adopted is periodically shared with stakeholders, including through the Group's Sustainability Report.

The responsibility for managing and overseeing Golden Goose's human rights commitments and actions, as well as compliance with this Policy, lies with Management, which is also responsible for engaging internal and external stakeholders in such endeavors.

## 04.2 NON-COMPLIANCE AND WHISTLEBLOWING

Golden Goose is strongly committed to upholding the fundamental human and labor rights of all persons working for and with the Group, ensuring a work environment where everyone feels safe and protected. It therefore encourages everyone to speak up when a concern arises, ensuring in turn access to remedy to address any adverse impact on human rights that it might have contributed to or caused.

Golden Goose's suppliers are required to monitor the implementation of and compliance with the human rights provisions set forth herein by their respective employees, colleagues, business partners, and any other third party within the value chain.

A whistleblowing system is available to all Golden Goose employees, external partners, and direct suppliers to report concerns or grievances. All Recipient of this Policy in possession of information regarding the commission of crimes or practices not in line with the rules and principles of conduct set forth herein may submit a non-compliance report, anonymously or otherwise, as per Golden Goose's Whistleblowing Policy.

Several communication channels are in place to ensure this Policy is disseminated and made accessible to all Recipients. Within the organization, it is provided to the entire Golden Family during the onboarding process, in addition to being available on the Group's intranet. Golden Goose is also committed to providing adequate human rights training to its employees, to enhance their awareness and understanding of the Policy's provisions.

In order to share Golden Goose's commitment to protecting human rights with as many people as possible, this document is also available to all interested stakeholders through the Group's website.

This Policy is a living document that is regularly edited and/or updated to ensure high standards and the continued relevance and effectiveness of its contents and implementation. The Policy will therefore be subject to periodic revisions in response to changes in laws and regulations, the latest best practices and standards, and the outcomes of human rights risk assessments and audits.

Recognizing that dialogue with stakeholders may lead to important insights for the continuous improvement of this Policy, Golden Goose encourages all Recipients to share any questions, comments or suggestions with the Group's Ethics Committee.

### REFERENCE DOCUMENTS

This Policy is part of a broader framework of policies and procedures adopted by Golden Goose in relation to protecting the human rights of its people, other employees within the supply chain, local communities, and the environment, which are applied both within the organization and across the value chain and include the following:

- Code of Ethics
- Supplier Code of Conduct
- Whistleblowing Policy
- Inclusion & Belonging Act.





This Policy has been adopted  
on February 29, 2024  
following approval  
of the CEO of Golden Goose Group S.p.A..

**GOLDEN GOOSE**