We Take Care of Everyone.
We like Smiling, We Look for Solutions, We Help Each Other, We are Supportive, We Build, We Take Responsibility.
We Listen, We Integrate Diversity, We Enable, We Empower, We Promote.
We are Devoted To Detail With Passion, Commitment and Accuracy.
We Include, We Learn, We Support With Ethic, We Measure, We Reward.
CODE OF ETHICS

Approved by resolution of the Board of Directors on February 04, 2022.
The Golden Manifesto

Golden Goose is a journey of love.

We strive for uniqueness, which for us is synonymous with authenticity.

This is why craft and manual touches are crucial for us. This is why our Italian heritage is and will always be at the core of the brand. We have a firm will to preserve traditional craft, making it the moment, channeling the warmth of the artisanal hand through perfect imperfections.

The way we treat surfaces is our signature. We like things that are lived in, distressed, touched with life.

In our family, we want everything to be as non-perfect as possible. Life is not perfect. We inject life into what we do.
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A Journey of Love
Golden Goose is a journey of love which began in Venice in 2000 inspired by the creative spirit of Francesca Rinaldo and Alessandro Gallo: a couple of young designers, outsiders with respect to the fashion world.

The intention that has always driven Golden Goose has been to stand out with an innovative, artisanal product, an unconventional communications strategy and a selective positioning in locations that share the brand’s philosophy.

Golden Goose defines itself as a lifestyle brand because every day it incorporates its values and culture into the products it makes. Every sneaker created, every store opened, every action reflects Golden’s values: Familiality, Positivity, Respect, Quality, and Success.

The Company strongly believes in the power of community and making each individual feel welcomed and valued in their uniqueness, regardless of their identity, culture, background, or any other diverse trait, just like in a family. In fact, its people make up the Golden Family while Brand Lovers represent the customer community.

At Golden, respect, trust, two-way dialog, and a common search for solutions are always placed at the center of every relationship, both within the Company and outside with its suppliers, customers, and partners. This way of relating, which is part of the corporate culture, allows for the creation of more authentic and lasting ties that generate value. In fact, Golden Goose believes that long-term success and growth do not depend only on the results achieved, but also on the manner in which they were achieved and the relationships created with its stakeholders.

Golden’s mission is to give life to unique creations that can be experienced and loved, inspiring everyone to express their inner star through creativity and daring to go beyond.

Everyone can be a Star.
We include and make everyone welcome in our House. We Take Care of Everyone.

We approach what we do with positive energy. We engage and support with optimism and self-confidence. We like Smiling, We Look for Solutions, We Help Each Other, We are Supportive, We Build, We Take Responsibility.

We truly engage in our internal and external relationships. We Listen, We Integrate Diversity, We Enable, We Empower, We Promote.

We encourage a culture of success and support result-oriented mindsets. We celebrate outstanding individual and team achievements. We Include, We Learn, We Support With Ethic, We Measure, We Reward.

Quality is intrinsic within our people, products, network, communication and behavior. Excellence is our obsession. We are Devoted To Detail With Passion, Commitment and Accuracy.

GOLDEN GOOSE FOUNDERING VALUES

1. **FAMILIALITY**
   - We include and make everyone welcome in our House. We Take Care of Everyone.

2. **POSITIVITY**
   - We approach what we do with positive energy. We engage and support with optimism and self-confidence. We like Smiling, We Look for Solutions, We Help Each Other, We are Supportive, We Build, We Take Responsibility.

3. **RESPECT**
   - We truly engage in our internal and external relationships. We Listen, We Integrate Diversity, We Enable, We Empower, We Promote.

4. **QUALITY**
   - Quality is intrinsic within our people, products, network, communication and behavior. Excellence is our obsession. We are Devoted To Detail With Passion, Commitment and Accuracy.

5. **SUCCESS**
   - We encourage a culture of success and support result-oriented mindsets. We celebrate outstanding individual and team achievements. We Include, We Learn, We Support With Ethic, We Measure, We Reward.
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GOLDEN GOOSE

FAMILIALITY

POSITIVITY

SUCCESS

RESPECT

QUALITY
Introduction
The Code of Ethics (hereinafter also referred to as the Code) sets out the values, principles, and rules of conduct of Golden Goose (hereinafter also referred to as Golden or the Company) that must orient the conduct of business, relations with stakeholders (employees, contractors, customers, suppliers, shareholders, lenders, State and institutions, the community, the environment, the media), and with all those the Company comes into contact with in the course of its activities.

Everyone who works at and for Golden Goose is committed to observing and enforcing the principles of this Code. In no way can the belief that you are acting for the benefit or in the interest of the Company justify conduct that conflicts with this document.

The goal of the document is therefore to:

- Explain and clarify the principles, values, and conduct to be followed both internally and externally.
- Make these principles compulsory also with a view to preventing corporate crimes.
- Hold accountable anyone who has dealings with Golden Goose for any reason for compliance with them.

The Code of Ethics is inspired by some of the main national and international regulations, guidelines, and documents on corporate social responsibility and corporate governance, Human Rights and the Environment, such as for example the United Nations Charter of Rights, the Charter of Human Rights of the European Union, the decent work standards contained in the ILO (International Labor Organization) conventions and the Guidelines for Multinational Enterprises of the OECD (Organization for Economic Cooperation and Development).

The ethical principles shared in Golden are:

- Act with integrity and a sense of responsibility.
- Comply with laws and regulations.
- Respect the dignity and rights of each individual.
- Act with respect for the natural environment.
- Use Company assets and resources in the best interests of the Company and its shareholders.
- Encourage its people in their solidarity and sustainable development initiatives.
- Respect business confidentiality.

In general, those who work on behalf of Golden Goose must comply with the laws and regulations of the countries they do business in and abide by the norms of the international community. However, the Company requires Recipients of the Code to comply with ethical standards and principles of conduct that may be more restrictive than the mandatory laws of some countries that it operates in.
Recipients of the Code of Ethics
This Code of Ethics applies to all Golden Goose facilities (corporate offices, warehouses, production sites, and stores) in all countries where the Company operates and to all aspects of its business.

Therefore, this Code is addressed to the members of the Board of Directors, the members of the control bodies, the managers (or any person who holds representative, administrative, or managerial positions or exercises the management and control of Golden Goose or one of its units, even in a de facto manner), the employees, and all those who for various reasons — directly or indirectly, permanently or temporarily — act in the name or on behalf of Golden Goose or establish relationships with it, and work to pursue its objectives. For example: temporary workers, contractors, and subcontractors of works or services, consultants, agents, direct and indirect suppliers, third parties who have a partnership relationship, etc.

All Recipients are required to be familiar with the Code of Ethics, to observe its provisions both in their relations with each other and with third parties, to contribute actively to the implementation of its principles, and to report any shortcomings to the bodies responsible for updating it (see “Implementation of the Code”).

Golden Goose ensures the widest possible dissemination of the Code to all Recipients and the general public.
4 Everyone Can Be a Star
4.1 PEOPLE

Golden Goose recognizes the centrality of its people in the creation of value for the company, protecting their physical and moral integrity, promoting their development in a safe, meritocratic, stimulating, and inclusive work environment where diversity is valued and where everyone is put in a position to better express their skills, potential, and talent. Inclusion, participation, sharing: these are the words that best describe Golden. Each person is encouraged to be themselves and follow their dreams.

4.1.1 Equal opportunities and non-discrimination

In all stages of the relationship with its people Golden Goose makes assessments and considerations of merit, avoiding any form of discrimination, is committed to offering equal opportunities from the first stage of selection, and to support the creation of an inclusive and collaborative environment.

To ensure a welcoming work environment where no one is discriminated against, Golden Goose:

- Guarantees the principle of equal opportunity at all stages of the employment relationship (selection, development and training, remuneration, disciplinary procedures, termination of employment, retirement), committing itself to preventing and avoiding discrimination on the basis of ethnic origin, race, religion, gender, sexual orientation, disability, age, political opinion, marital status, maternity or paternity, personal opinion, or any other form of diversity.

- Rejects all forms of violence and harassment (physical, verbal, sexual, psychological, moral or mobbing, intimidation, or threats) towards employees, suppliers, customers, or visitors (see also “Human Rights”).
4.1.2 Health and safety

Golden Goose is committed to safeguarding the health and safety of its people, suppliers, customers, visitors, consultants, and anyone else who enters its sphere of influence by complying with health and safety regulations in the countries it operates in.

The Company develops all the activities necessary for prevention and protection: training on health and safety regulations, development of the skills necessary to carry out the work with training and education programs useful to promote safe conduct, supervision of the application of health and safety regulations and procedures, analysis of the causes of injuries and accidents, etc.

Safety is everyone’s responsibility. It is important that everyone be required to comply with health and safety regulations and take appropriate preventive measures to protect themselves and others.

Golden Goose is also committed to assessing and preventing work-related stress and developing initiatives to promote and protect the health of its people, ranging from wellness programs and prevention campaigns to a ban on smoking in the workplace.

RECIPIENTS OF THE CODE MUST:

- Facilitate the adoption of preventive measures necessary to avoid endangering their own safety or that of others.
- Report any unsafe behavior or working conditions.
- Employ appropriate protective equipment and perform risk assessments with implementation of improvement plans.
- Promote a culture of prevention.

Ensure the regular maintenance of workplaces, equipment, facilities, and safety and protective devices, as well as the adoption of innovative technologies and systems to operate safely.

Avoid any form of aggression, whether physical or verbal.

Not abuse alcoholic beverages and/or use narcotics or any other substance that may alter one’s state of consciousness, preventing the effective performance of work and exposing oneself and others to a safety hazard.

4.1.3 Golden Family

The Golden community is an extended family, united by the same principles and values where everyone can feel welcome and free to express themselves. Golden Goose works to encourage motivation, to support the development and growth of its people, and strives to ensure that the energy and creativity of individuals find full expression in the achievement of corporate objectives.

The Company strongly promotes participation and sharing in all business decisions and expects its people at all levels to work together in an atmosphere of mutual respect and listening and to promote the exchange and dissemination of information essential for the creation of shared value.

Moreover, in order to maintain a good work-life balance and to support wellbeing in the workplace, Golden is committed to fostering a supportive, caring, and productive work environment. To this end, the Company implements policies and mechanisms based on local needs that facilitate each individual’s daily life and quality of work life: remote work, flexible hours, parental leave, concierge services, corporate volunteering.
4.2 CUSTOMERS

Golden Goose understands that customer relationships are key to building long-term success. Every moment of contact is an opportunity to welcome and get to know customers, but also to recount, engage, and co-create.

The Company believes it is essential that its customers are always treated honestly, fairly, transparently, and impartially, and is committed to ensuring that their expectations are fully met.

RECIPIENTS OF THE CODE MUST:

Ensure that products meet market expectations and requirements, such as but not limited to the safety of the materials and chemicals used to process the materials.

Ensure the high quality standards of the products and services offered.

Provide accurate, complete, and truthful information about the products and services offered so that customers can make informed decisions.

Ensure maximum attention to the suggestions and complaints of customers.

Fulfill all commitments and obligations.

Protect the information provided by customers in accordance with applicable laws by ensuring confidentiality.

Conduct themselves in a manner that conveys openness, respect, courtesy, and the highest professionalism.

Avoid any kind of discrimination in negotiations with customers.

Disapprove of the use of advertising and/or communications tools designed in any way to mislead the customer about the quantity, quality, origin, and provenance of the products/services offered.

Ensure communication that is not offensive to human dignity, discriminatory, or suggestive of violence or dangerous behavior patterns.
Golden Goose is committed to establishing a partnership with its suppliers that is based not only on the excellence and reliability of the technical and qualitative level of the product, but above all on the sharing of social, ethical, and environmental values and principles.

The Company does not work with partners who do not adhere to the same standards of conduct, and, through the Supplier Code of Conduct, a document that is separate from this Code, informs all its suppliers of the details of these principles, asking them to accept and respect them.

In the selection of suppliers and in the formulation of purchase conditions, Golden is inspired by principles of objectivity, competence, competitive pricing, transparency, propriety, quality of the good or service, and to the respect of the relevant internal procedures, carefully evaluating the guarantees of after-sales support and the panorama of offers in general. Indeed, the Company is committed to seeking professionalism and full acceptance of the principles of the Code of Ethics and of the Suppliers’ Code of Conduct adopted by Golden in its suppliers and external contractors and promotes the building of lasting relationships for the progressive improvement of performance in the protection and promotion of the Code’s principles and contents.

The Company avoids entering into or continuing relationships with suppliers suspected of belonging to or facilitating criminal organizations or whose conduct does not comply with applicable laws and shared principles.

All suppliers must read and comply with all contracts stipulated with Golden Goose, which includes the obligation to comply with the Code of Ethics and other rules of conduct that the Company has prepared and communicated, the violation of which – qualified as a serious breach – is associated with specific penalties.

**RECIPIENTS OF THE CODE MUST:**

Deal with suppliers with the utmost propriety and professionalism, encouraging ongoing relationships and mutual growth, building solid and lasting relationships of trust in compliance with laws and regulations.

Educate suppliers on the principles set forth in the Code of Ethics, encouraging all suppliers to adopt their own Code of Ethics throughout their companies and supply chains.

Monitor effective compliance with the principles set out in the Code of Ethics and the Suppliers’ Code of Conduct.

Not offer or accept gifts or any other form of benefit that could be construed as a means of obtaining favorable treatment for any activity related to Golden Goose and are not attributable to normal business dealings or courtesy (see also “Conflict of Interest” and “Corruption”).

Avoid entering into contractual relationships that involve forms of mutual dependence.
Golden Goose is committed to maintaining a relationship with shareholders and the financial market based on trust, transparency, and integrity, and is convinced that a responsible use of resources aimed at increasing the value produced by the company can ensure a long-term return on investment.

The Company promotes the timely, complete, and accurate dissemination of communications that can affect investment or divestment decisions by shareholders, without generating any information asymmetry among the parties.

Golden also complies with applicable financial and accounting regulations (see also “Accounting Control and Transparency”), publishes financial results on a regular and reliable basis, maintains all records, business books, financial and reporting documents in a manner that provides accurate and truthful information.

**RECIPIENTS OF THE CODE MUST:**

Ensure that transactions are recorded in accordance with applicable accounting standards and have been executed with the authorization of the designated persons as appropriate to the activities performed.

Ensure that security measures are implemented to protect the confidentiality, availability, and integrity of Golden Goose accounting and financial information.

Promote an ongoing dialog with shareholders and the financial market to increase knowledge and understanding of the Company’s results and future development plans, among others.
4.5 CONTROL BODIES

Golden Goose’s relations with control bodies are based on principles of maximum cooperation and transparency.

RECIPIENTS OF THE CODE MUST:

Refrain from any action or omission aimed at obstructing research or distracting the attention of the control bodies from their respective supervisory activities.

4.6 OTHER GROUP COMPANIES

The Company undertakes to avoid conduct or decisions for its own benefit that are detrimental to the integrity, autonomy, or image of other companies in the group that Golden Goose belongs to (the “Group”).

RECIPIENTS OF THE CODE MUST:

Encourage communication between Group companies, synergies, and cooperation in the common interest, including but not limited to the drafting of consolidated financial statements and existing contractual relationships.
4.7 PUBLIC ADMINISTRATION

Golden Goose ensures maximum cooperation with the Public Administration, public officials, or persons providing a public service, conducting itself in strict compliance with applicable laws and regulations and protecting its integrity and reputation.

The Company acts with the utmost transparency, clarity, propriety, and impartiality in its relations in order not to create partial, false, ambiguous, or misleading interpretations in the public institutions it interacts with in various ways.

RECIPIENTS OF THE CODE MUST:

Not offer - even through an intermediary - money or other benefits to public officials, their family members, or to persons connected to them in any way with the aim of directly or indirectly influencing their activities [see also “Corruption”].

Avoid seeking or establishing personal relationships of favor, influence, or interference and soliciting or obtaining confidential information that could compromise the integrity or reputation of both parties or which in any case violate the equal treatment and public evidence procedures put in place by Public Institutions or Public Officials.

Refrain from accepting a public official’s request for money, gifts, or services in order to perform or not perform an expected or facilitated activity as part of their job [see also “Corruption”].

Not accept any request for contributions or sponsorships [see also “Sponsorships and contributions”] that could influence business negotiations or favor the Company in the event of controls/inspections/audits by the Authorities.

Refrain from being represented in relations with the Public Administration by contractors and/or third parties where a conflict of interest may arise, even if only in theory [see also “Conflict of interest”].

Refrain from allocating contributions, subsidies, or funding obtained from the State or from another public body to purposes other than those for which they were granted, even if of modest value.

Refrain from any conduct aimed at obtaining any type of contribution, financing, subsidized loan, or other disbursement of a similar type from the State or other public body by means of altered or falsified statements and/or documents or by means of omitted information, including those made by means of a computer or electronic system.

Refrain from reticent, omissive, or obstructive conduct towards national and foreign judicial authorities.
4.8 TRADE UNIONS AND POLITICAL PARTIES

Golden Goose recognizes and respects the right of employees to be represented by labor organizations, and maintains a relationship of mutual recognition, dialog, and cooperation with such representatives.

Relations with trade unions and political parties are managed in compliance with the highest principles of transparency, independence, and propriety, and in strict compliance with current laws.

RECIPIENTS OF THE CODE MUST:

Refrain from making direct or indirect contributions of any kind to political parties, movements, committees, and political and trade union organizations, their representatives, or candidates, both in Italy and abroad.

Refrain from any direct or indirect pressure on political officials including but not limited to acceptance of recommendations for hiring people or stipulating consulting contracts.

4.9 ASSOCIATIONS

Golden Goose believes that dialog with associations that represent its interests is important for the development of its business and encourages the creation of channels of communication based on principles of impartiality and independence in order to cooperate in accordance with mutual interests.

RECIPIENTS OF THE CODE MUST:

As much as possible ensure responses to comments from all associations.

Refrain from making contributions to organizations where there may be a conflict of interest, including but not limited to consumer protection associations.
5 Rules of Conduct
5.1 HUMAN RIGHTS

Golden Goose recognizes the importance of promoting Human Rights and respecting the rights of workers throughout the value chain. The Company rejects forced and child labor and any type of physical, verbal, sexual, or psychological harassment, abuse, threats, or intimidation in the workplace, thereby ensuring respectful and favorable working conditions in the countries it operates in, including in terms of working hours and wage determination.

RECIPIENTS OF THE CODE MUST:

Ensure a workplace free from discrimination and harassment (see also “Equal opportunities and non-discrimination”).

Not consciously entertain direct or indirect relations of any kind with parties who violate the regulations on the protection of child labor and the protection of women and/or the illegal use of labor deriving from immigration trafficking in any way.

Prohibit any form of physical or verbal intimidation, threats, harassment, or abuse that may create an intimidating, offensive, or hostile work environment (sexual harassment, offensive language or attitudes, racial, ethnic, sexual, or religious insults).

Make every effort to ensure that its people and contractors work in a safe, healthy, and legally compliant environment (see also “Health and safety”).

Recognize the right to free association and collective bargaining.
5.2 ENVIRONMENT

Considering the environment to be the heritage of the community and of future generations, Golden Goose is committed to promoting its protection and conservation, encouraging corporate conduct aimed at reducing its environmental impact in all the countries it operates in, including through the limitation of emissions and the reduction of energy consumption, waste, and potentially hazardous substances in production processes, in its facilities (corporate offices, warehouses, production sites, and stores), as well as in logistics. The Company is also committed not to contributing to deforestation in the procurement of packaging and leather.

RECIPIENTS OF THE CODE MUST:

- Comply with applicable environmental regulations and standards throughout the value chain.
- Commit to spreading a culture of respect for the environment, promoting responsible behavior and contributing to its protection.
- Promote the research of knowledge and technologies for the reduction of environmental impact and control production processes for their continuous improvement.

5.3 ANIMAL WELFARE

When sourcing raw materials of animal origin, Golden Goose requires its people and suppliers to commit to ensuring that such materials have not been obtained through cruel breeding and/or harvesting practices, repudiating any form of mistreatment and other harmful activities. The Company also requires suppliers to comply with the “Five Freedoms”1 for farm animal welfare.

Golden also commits not to use animal furs or skins of endangered animals (according to the CITES list) in the manufacturing of its products.

RECIPIENTS OF THE CODE MUST:

- Comply with all applicable animal health and welfare laws and regulations and ensure the welfare of animals with respect to, for example, their breeding, transportation, hunting, and slaughter.
- Ensure the legality of the origin of animal materials.
- Promote compliance with the most advanced and recent scientific standards and best practices related to animal welfare throughout the supply chain.
- Ensure that the fragrances or related ingredients supplied have not been tested on animals for the production of the fragrances.

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1 Brambell Report published in 1965: the Five Freedoms describe the right to welfare of animals under human control (i.e. referred to as “...kept in intensive farming systems”).
5.4 CONFLICT OF INTEREST

In accordance with the values of honesty, impartiality, and propriety, Golden Goose commits to adopt all necessary measures to prevent and avoid conflicts of interest.

Every business activity must be oriented towards the satisfaction of the Company's interests and the pursuit of social development.

RECIPIENTS OF THE CODE MUST:

Prevent the emergence of situations and/or activities that could lead to conflicts of interest, or that could interfere with or prejudice their independence of judgment and choice - and therefore their impartiality - when making company decisions.

Act in accordance with ethical and legal standards, with an explicit prohibition on illegitimate favoritism, collusive practices, corruption, or solicitation of personal benefits for oneself or others.

Immediately report any conflict, even if potential, and refrain from any activity related to the situation giving rise to the conflict.
5.5 CORRUPTION

Golden Goose strictly prohibits all forms of bribery and corruption, including favoritism, in all countries it operates in, even in countries where such activities are allowed or not prosecuted.

RECIPIENTS OF THE CODE MUST:

Ensure that the bribery of public officials is not employed when dealing with governmental authorities on matters such as customs, tax, entry visas, and permits where local agents, consultants, or third party intermediaries are used.

Not directly or indirectly offer or accept from and/or to public officials, political representatives or parties, customers, suppliers, consultants, agents, business partners, or any other person or organization: money, gifts, services, or gratuities unless of modest value on the basis of local customs [in any case the Company prefers to donate them in turn to support charitable associations], and any other form of benefit, respecting the autonomy of their decision-making processes.

Not to incur entertainment expenses that could give rise to suspicions of impropriety or the appearance of influencing the actions of public officials, political parties or representatives, customers, suppliers, consultants, agents, business partners, or any other person or organization.

Avoid obtaining false licenses and permits, expedite the process, and avoid new store opening audits.

Avoid influencing the outcome of inspections, ensuring that they are carried out correctly and providing the required information and documentation in full.

Ensure maximum transparency and propriety in the preparation of the documentation for the request for public contributions or financing and in the management of relations with the officials of the public funding bodies.

Prevent the possibility of funds being created that are linked to illegal activities.

Ensure that the autonomy of regulators and public institutions is respected when managing normal relationships with representatives of institutions or political parties.
5.6 MONEY LAUNDERING

Golden Goose condemns any conduct that may even indirectly facilitate the receipt, laundering, or use of income, property or benefits derived from criminal activities in any form or manner.

The Company is committed to complying with applicable anti-money laundering and anti-organized crime and terrorism laws in any relevant jurisdiction, taking care that the transactions it is a party to do not even potentially present a risk of facilitating the receipt or substitution or use of money or property from criminal activities.

RECIPIENTS OF THE CODE MUST:

- Not be implicated in any way or under any circumstances in events connected with the laundering of money from criminal activities or the receipt of goods or other benefits of illicit origin.

- Verify the information available on suppliers, contractors, partners, consultants, and major customers in advance in order to ascertain their ethical integrity and possession of technical and professional requirements, not to mention the legitimacy of their activities, before establishing business relations with them.

- Avoid entering into or continuing business relationships with counterparties suspected of belonging to criminal organizations.

- Pay attention during commercial transactions when receiving and spending coins, banknotes, credit instruments, and valuables in general in order to avoid the danger of disseminating counterfeit instruments.

- Strictly comply with the law, ensuring full traceability of incoming and outgoing financial flows and full compliance of such transactions with anti-money laundering laws.

5.7 SPONSORSHIPS AND CONTRIBUTIONS

Golden Goose can decide to sponsor events and initiatives by making agreements with serious, qualified beneficiaries.

The Company only considers requests for contributions from non-profit organizations and associations or entities of cultural and social value according to procedures established internally. When participating in these initiatives, it commits to pay particular attention to possible situations of conflict of personal or corporate interests. Sponsorships may be stipulated subject to the definition of specific agreements and verification of the reputation of the beneficiary and the event/initiative promoted, avoiding the sponsorship of counterparts which are even only suspected of belonging to criminal organizations or committing money laundering offenses.

RECIPIENTS OF THE CODE MUST:

- Evaluate the reliability of the beneficiaries and their consistency with the Company’s values.

- Ensure that contributions made are compliant and consistent with applicable laws, and accurately documented.
5.8 CONFIDENTIAL INFORMATION, PRIVACY, AND SOCIAL MEDIA

CONFIDENTIAL INFORMATION
Golden Goose commits to protect any sensitive, confidential, privileged, or reserved information concerning the Company and to operate in accordance with the principles of fairness, propriety, equal access to information, and transparency and in full compliance with current laws on market protection and abuse of confidential information.

RECIPIENTS OF THE CODE MUST:

Maintain the confidentiality of any non-public information acquired as a result of their position within Golden Goose (or the fact that they are doing business with Golden Goose) and not use such information to gain personal advantage for themselves or for anyone unrelated to the Company’s business objectives. Such information may relate to current and future activities, information, and news not yet published, even if soon to be released. This prohibition is valid even after the termination of the employment and/or contractor relationship.

Not disclose false or misleading information about Golden Goose or other parties that the Company deals with in the course of its business. It is also prohibited to disclose any “price sensitive” information acquired while conducting company business or other professional or official activities.

Keep data confidential in such a way as to prevent third parties from gaining knowledge of it.

Leave the Company’s relations with mass media exclusively to the designated functions in order to guarantee completeness and consistency of information.

Use personal data properly and keep them only as long as is necessary for the purpose they were collected for.
PRIVACY
In carrying out its business Golden Goose collects a significant amount of confidential information and personal data, which it commits to process in accordance with EU Regulation 2016/679 and the best practices applied in this area in order to avoid improper or even illegal use.

Golden Goose has a complete, updated privacy policy ensuring data subjects’ subjective right to the protection of their personal data (i.e. of employees, contractors, customers, suppliers, partners, etc.), including with respect to special data acquired or to be acquired and/or processed during operations. The Company requires consent to process personal data whenever required by applicable law for the purposes of lawful processing.

Golden Goose commits to adopt specific technical measures to ensure the protection of data against any form of breach and/or abuse and to ensure an adequate level of security in IT systems that process personal data and confidential information.

SOCIAL MEDIA
At Golden Goose all people are encouraged to act as Company ambassadors. However, only persons duly authorized to do so may communicate on Golden's behalf. You are permitted to speak about the Group, but not on behalf of the Company. The publication of content online must always comply with principles of propriety and avoid damaging the company’s reputation.

RECIPIENTS OF THE CODE MUST:
Always bear in mind that actions taken on social networks, even on a personal basis, can have an indirect negative influence on the company.

Avoid comments or discussion of Golden’s business posted by third parties or the general public. This guidance refers to all interactive digital media, such as social network websites (e.g. Facebook, Instagram, LinkedIn, and Twitter), blogs, and video/photo sharing websites (e.g. YouTube, Flickr, forums).

Use social media responsibly.
5.9 INDUSTRIAL AND INTELLECTUAL PROPERTY

Golden Goose constantly promotes the innovation and technological evolution of its products, processes, and services, even through third parties that work on behalf of the Company.

Golden commits to act in full respect of the industrial and intellectual property rights legitimately held by the company itself and by third parties, as well as of the laws, regulations, and conventions protecting such rights at a national, Community and international level.

RECIPIENTS OF THE CODE MUST:

- Not counterfeit, alter, duplicate, reproduce, or distribute the work of others in any form whatsoever and without the right to do so.

- Refrain from misappropriating industrial property rights, designs, or industrial models or altering or counterfeiting trademarks or other distinctive product marks.

- Avoid importing or putting into circulation industrial products with counterfeit distinctive marks by misappropriating the rights of third parties.

- Not allow others to use trademarks or other intellectual property.

- Safeguard intellectual property with the utmost care and disclose it in compliance with confidentiality agreements when authorized.

5.10 COMPETITION

Golden Goose firmly believes in fair, open, and equitable competition, which is a factor of economic and social progress in terms of price, quality, and range of supply, in the interest of the end customer. It therefore recognizes the importance of a competitive market and commits to comply with national and EU antitrust legislation as well as similar non-EU regulations to protect competition and the free market.

Golden Goose willingly cooperates with competition authorities in any investigation, does not obstruct any inspections and does not withhold, conceal, or delay any information requested.

RECIPIENTS OF THE CODE MUST:

- Not use unlawful means to acquire competitors’ trade secrets or other confidential information.

- Not apply particular price and contractual conditions that have the sole purpose of excluding competitors from negotiations.

- Comply with antitrust laws that prohibit the formation of monopolistic or cartel agreements and interference in the mechanisms of competition even without acting jointly with other companies.

- Refrain from implementing and/or encouraging forms of unfair competition.
5.11 ACCOUNTING INFORMATION

In preparing the Financial Statements and any other type of accounting documentation, Golden Goose complies with the applicable laws and regulations in force, adopts generally accepted accounting practices and principles and is inspired by the principle of transparency in its relations with stakeholders, faithfully representing operations according to criteria of clarity, truthfulness, completeness, and correctness.

All financial transactions and all incoming and outgoing monetary flows are carried out by authorized parties and are always tracked and recorded.

RECIPIENTS OF THE CODE MUST:

- Be responsible for the authenticity and truthfulness of the documentation and information provided in the course of their work.

- Ensure that management events are correctly and promptly reflected in financial statements, reports, or other corporate communications.

- Facilitate the availability of supporting documentation and ensure proper archiving.

- Keep accurate and complete records and not falsify, omit, misstate, alter, or conceal any information.

5.12 COMPANY ASSETS AND IT TOOLS

Golden Goose provides its people with company assets and tools in order to carry out the activities necessary for their work.

With specific regard to IT tools, it is expressly prohibited to engage in conduct that may damage, alter, deteriorate, or destroy the Company’s IT or electronic systems, programs, or data, or unlawfully intercept or interrupt IT or electronic communications. It is also prohibited to illegally break into computer systems protected by security measures or to obtain or distribute access codes to protected computer or electronic systems.

RECIPIENTS OF THE CODE MUST:

- Use company assets responsibly and in line with the operating instructions put in place for their use. Specifically, with regard to tangible resources (telephone, vehicles, computers, etc.), its people commit to observe the relevant instructions for use, duly provided to them. With regard to intangible resources (Internet, email, etc.), personal or non-work-related use is not permitted unless expressly authorized.

- Avoid waste, misuse, or improper use of company assets for purposes contrary to law, public order, or morality, as well as committing or inducing the commission of crimes and/or in any case racial intolerance, glorification of violence, or violation of human rights.

- Be responsible for the safekeeping, protection, and preservation of assigned assets and resources.

- Access only authorized IT resources, safeguard credentials and passwords used to access the company network and the various applications and personal keys in a manner that prevent easy identification and improper use, comply with internal policies on anti-intrusion and anti-virus devices.
Implementation and Control
This Code of Ethics and any future updates to it shall be approved by the Golden Goose Board of Directors. Subsequently, the Code of Ethics shall be disseminated to all Group companies, which shall formalize its application by resolution of their governing bodies. Any additional specific rules of conduct and policies resulting from local practices or regulations may be adopted in addition to this document.

6.1. IMPLEMENTATION OF THE CODE

The implementation of the Code is primarily the responsibility of the directors and management, who are called upon to give concrete form to the values and principles contained in the document, assuming responsibility both internally and externally, strengthening trust, cohesion and the spirit of the Company, and allowing their own conduct to act as an example to guide the Recipients in their daily actions.

All other Recipients are also required to cooperate in the implementation of the Code, within the limits of their own responsibilities and functions.

In order to pursue compliance with the principles and standards set forth in this Code, the Company shall ensure:

- The dissemination, accessibility, and comprehension of the document.
- Its uniform interpretation and implementation.
- The organization of training courses for its people and awareness-raising activities for other Recipients.
- The performance of investigations of reports of violations of the Code and application of sanctions in the event of violations in accordance with current regulations.
- Periodic updating of the document based on the needs that may arise from time to time, and timely dissemination to all Recipients.

The Code can be downloaded online from Golden’s website (www.goldengoose.com) and is available in English and Italian.

The Company also commits to provide a copy to all employees when they join the company, to make it an integral part of supply contracts and known to external parties (customers, suppliers, consultants, external contractors, etc.), including through the use of specific contractual clauses. Finally, Golden requires each Recipient to sign the document, even digitally, in order to promote the full awareness of the principles set out therein.

If an employee has any doubts or questions about the application of the standards of conduct, they may consult with their supervisor and/or the Talent department.

6.2. WHISTLEBLOWER REPORTS

If the rules of the Code are violated or simply not applied despite the procedures in place, or if they give rise to a conflict, the Recipients must inform the Ethics Committee. In fact, Golden Goose has established a reference body consisting of the Head of Human Resources, Legal Affairs and Sustainability, with the duty of reviewing reports of possible violations and promoting the most appropriate investigations and verifications, relying on the competent structures of the Company. It will then have the task of assessing and communicating the results of the investigations to the corporate bodies so that the appropriate corrective measures can be taken based on the nature and seriousness of the violation. Moreover, the Committee commits to provide feedback regarding the outcome of the investigation to the whistleblower. Finally, the Ethics Committee is also the point of reference for the interpretation of relevant aspects of the Code.

Any Recipient of the Code who comes into possession of information relating to the commission of crimes or practices that are not in line with the rules of conduct and principles of this Code may report it anonymously or otherwise by email to: ethics@goldengoose.com or by post to Ethics Committee c/o Golden Goose S.p.A.- Via Privata Ercole Marelli 10 - 20139 Milan.

The strict confidentiality of the identity of the whistleblower and the information disclosed, including the identity of the person being reported, and the prohibition of retaliation against the whistleblower, are intended to ensure the whistleblower’s protection. Anyone who retaliates in any way shall be subject to disciplinary action. This means that even if the facts are not proven, a whistleblower acting in good faith has no cause for concern and will be protected if they are intimidated.

Anyone who submits reports with malice or gross negligence that prove to be unfounded shall also be punished. In fact, anyone who falsely accuses someone shall in turn be subject to sanctions and/or measures, as such conduct shall be treated as a violation of this Code.
6.3 CONSEQUENCES OF NON-COMPLIANCE WITH THE CODE

Failure to comply with the Code of Ethics constitutes a violation thereof and represents a serious breach of contract.

Depending on the case, failure to comply with the principles of the Code may therefore result in the application of disciplinary measures and/or sanctions or termination of the contract. Specifically:

- For its people and contractors, a violation constitutes a breach of the obligations deriving from the employment relationship and/or a disciplinary offense that may prejudice the continuity of the employment relationship and also lead to lawsuits for damages.

- For directors, the breach may result in the adoption of proportionate measures by the Board of Directors based on the seriousness, recidivism, or the degree of fault, up to and including dismissal for just cause.

- For other Recipients, compliance with the Code is a prerequisite for the continuation of the existing professional/collaborative relationship and may constitute a breach of contractual obligations with all legal consequences, including termination of the contract, and may also lead to a claim of compensation for damages suffered by the Company.
1 Glossary and Definitions
CONFLICT OF INTEREST: occurs, for example, when:

- There are economic or financial interests, including through family members, with suppliers, customers, or competitors, and with external parties seeking to do business with the Group.
- One uses their position or information acquired in the course of work for their own benefit or the benefit of a third party and contrary to the interests of Golden Goose.
- Performing work of any kind (work and intellectual services) or holding a position with suppliers, customers, competitors, and/or third parties that conflict with the Company’s interests.
- Concluding or initiating negotiations and/or contracts – in the name of and/or on behalf of the Company – involving family members or partners, or legal entities of companies of which one is the owner or stakeholder.
- Accepting money or any other benefit or favor from any person or entity who is or intends to be in business with Golden Goose.

ACTIVE CORRUPTION: refers to the direct or indirect unlawful offer or promise of benefits to a person at any time with the objective of inducing that person to take or not take a particular action.

PASSIVE CORRUPTION: refers to the situation where another person requests or obtains the offer or promise of money, gifts, services, or benefits in order to perform or not perform an expected activity or facilitate it as part of their job position.

FAVORITISM: this refers to offers, promises, donations, gifts, or benefits of any kind offered directly or indirectly to a person to encourage them to abuse, or because they have abused, their presumed or real influence in order to obtain recognition, employment, contracts, or other favorable decisions by a public authority or public administration.

CIVIL SERVICE: activities governed by rules of public law pertaining to legislative, administrative and judicial functions.

CONFIDENTIAL INFORMATION: all information relating to company projects (commercial, strategic, industrial, operational plans, etc.), investments and divestments, data relating to employees, know-how and processes, databases containing suppliers, customers, and contractors, technological innovation, acquisition or merger plans, and corporate agreements. Economic and financial information concerning the Company that has not yet been disclosed to the financial community shall also be considered confidential.

MORAL HARASSMENT OR MOBBING: intentionally hostile, aggressive, or vexatious actions and conduct carried out in a repeated and systemic way, constantly ongoing and in a persecutory manner by those in a superior or subordinate position to the person who is the victim, or by other colleagues; such actions and conduct have the purpose or effect of violating the personal dignity and damaging the psychophysical integrity of the person, including marginalizing them from the work environment.

SEXUAL HARASSMENT: this includes but is not limited to subordinating career advancement to the acceptance of sexual favors, proposals of private interpersonal relationships, and conduct that is expressly or evidently unwanted and that has the capacity given the specific nature of the situation to create a hostile environment for the recipient.

PUBLIC ADMINISTRATION: all those entities, both private and public, that perform a civil or public service.

PUBLIC SERVICE: activities involving the production of goods and services of general interest and subject to the supervision of a Public Authority, and those activities aimed at guaranteeing a person’s right to life, health, freedom of communication, including under concession and/or convention.

STAKEHOLDERS: all those who have a legitimate interest in an organization’s activities and who influence or are influenced by its decisions.