

YOOX NET-A-PORTER GROUP

MODERN SLAVERY STATEMENT 2024

This Statement is made pursuant to the requirements of the U.K. Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending March 31, 2024.

This Modern Slavery Statement is made on behalf of YOOX NET-A-PORTER GROUP S.p.A. (the "Company") and its direct and indirect subsidiaries (all together "YNAP"). It applies and governs the actions and policies of YNAP in relation to the prevention of modern slavery and human trafficking.

This statement was approved by the Board of Directors of YOOX NET-A-PORTER GROUP S.p.A. on 26/09/2024 and is reviewed and updated on an annual basis.

About YOOX NET-A-PORTER GROUP

YNAP is an online luxury and fashion retail business. Comprised of four multi-brand online stores, NET-A-PORTER, MR PORTER, THE OUTNET and YOOX (the "Four Online Stores"), it connects customers to the world's most coveted brands, bringing them outstanding style and impeccable service. In addition, YOOX NET-A-PORTER's Online Flagship Stores partner with world-leading luxury brands to power their own e-commerce destinations.

With some 5.3 million customers across the globe, YNAP takes a localised approach to serving its clientele through its network of offices and operations across the United States, Europe, Asia Pacific, China and Middle East.

YNAP has offices and operations in the United States, Europe, Asia Pacific, China and Middle East, and delivers luxury fashion goods to more than 170 countries. In its global business operations, YNAP employs around 3,600 employees.

Procurement for the Four Online Stores is achieved via an international portfolio of thousands of brands and suppliers. YNAP has various direct suppliers around the globe, from which it buys products and materials for sale. As an international enterprise, YNAP has many indirect suppliers which relate to general business operations. These include - but are not limited to - suppliers who support YNAP transport, editorial, customer care, marketing, office management and technology.

Since August 2018, YNAP has been part of Richemont (the "Group") and its ultimate parent company is Compagnie Financière Richemont SA, Chemin de la Chênaie 50, 1293, Bellevue, Switzerland.

Governance

YNAP's Sustainability Team is responsible for managing human rights-related topics, including modern slavery. Day-to-day governance of the sustainability strategy is overseen by the YNAP Sustainability Team, which leads the delivery of YNAP's "Infinity" sustainability strategy across all aspects of the business, defining and implementing roadmaps and providing expert knowledge and guidance to the "Infinity" Leads. The "Infinity" Leads represent the Four Online

Stores in addition to key business functions: Human Resources, Operations and Technology. “Infinity” Leads are responsible for engaging teams across their divisions to help advance sustainability commitments and monitor impact of each function with the support of their “Infinity” Coordinators. YNAP Executive Committee champions the successful delivery of “Infinity”.

YNAP Sustainability Team is supported by the Group Sustainability team of Richemont.

Our Approach

YNAP is committed to respecting human rights as reflected in the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct, the Fundamental Conventions of the International Labour Organizations, and the ILO core Labour Standards.

Policies

YNAP has adopted various policies which it believes promote an environment where human rights are respected, and modern slavery is addressed. To ensure full awareness of and access to these policies, all YNAP employees are notified of policy launches and updates via YNAP’s internal social media platform. In addition, all policies are available for employees to access at any time via YNAP’s internal intranet.

As of July 2019, YNAP adopted Richemont’s [Standards of Business Conduct \("the Standards"\)](#). YNAP, in compliance with the Standards and the [YNAP Code of Conduct](#), seeks to ensure that ethical standards of doing business are clearly defined, adhered to, and represent a fundamental part of the corporate culture. The Standards and the YNAP Code of Conduct apply to everyone who represents YNAP; this includes employees, directors, temporary staff, contractors, agents, consultants, and business partners. Within its ‘Business & Human Rights’ section, the Standards highlight the Group’s commitment to respecting and promoting human rights.

In 2023, Richemont released a Human Rights Statement, reflecting the Group’s longstanding fundamental principles of respecting the human rights of all people across the business and value chain, including employees, customers, investors, partners, and suppliers. It describes the human rights related focus areas such as ‘Prohibition of forced labour, modern slavery and human trafficking’, which states that the Group does not tolerate forced or compulsory labour of any kind, and that it opposes the use of forced or unlawful compulsory labour in its own business operations, the business operations of its Maisons or by any suppliers, business partners and contractors, or for any other purpose.

YNAP has also integrated the requirements set out by the [Richemont Supplier Code of Conduct](#) into the [YNAP Code of Conduct for Suppliers](#). YNAP’s Code of Conduct for Suppliers reflects the commitment to ensuring that working conditions in its supply chains are safe; workers are treated with respect and dignity; manufacturing processes are socially, ethically, and environmentally responsible; and the conduct of its business is based on principles of integrity, honesty, and fairness.

Compliance with the terms set forth in the YNAP Code of Conduct for Suppliers is a contractual obligation. These terms include:

- Suppliers should not use any form of forced, bonded, indentured, or prison labour, and should/must not engage in any other form of compulsory labour, or any other form of slavery or human trafficking. All employment must be on a voluntary basis and workers should be free to terminate their employment at any time with reasonable notice.

- Suppliers must pay a fair remuneration for both men and women workers, for work of equal value in accordance with applicable local laws. Workers must receive wages and benefits that, at a minimum, meet all applicable laws.
- Suppliers must comply with local laws regarding minimum wages, standard working hours and employee benefits. Suppliers should not delay, withhold, or defer wages legally due to their employees, outside of industry standards. Overtime hours must be voluntary and fully compensated at regular or premium rates, according to local legal requirements.
- Suppliers must ensure that workers are at least the minimum age for employment or the age for completing compulsory education in the country where they are employed, whichever is the higher, as permitted by the ILO Minimum Age Convention. Young persons should be at least 16 years old, unless an exception is allowed by local law which is consistent with ILO guidelines.
- Suppliers must ensure that working conditions in their supply chain, of both goods and services, are safe; that workers are treated with respect and dignity; that manufacturing and connected processes are ethically and environmentally responsible; and that the conduct of their business is based on principles of integrity, honesty, and fairness.
- YNAP's suppliers, and all third parties working with or for YNAP, are obligated, in all their activities, to operate in full compliance with the laws, rules and regulations of the countries in which they operate.
- Suppliers are also expected to ensure that their employees and any subcontractors adhere to the standards set out within the YNAP Code of Conduct for Suppliers. YNAP may review and conduct audits and/or physical inspections of supplier facilities and records, including those of any subcontractor or other third party involved in the supply of products and/or services to YNAP on an ongoing basis to verify compliance with the YNAP Code of Conduct for Suppliers.

YNAP's Whistleblowing Policy addresses suspected or alleged wrongdoing by senior management, employees or third parties, including business partners, suppliers, associates, and all those who operate in the name or interest of YNAP. This policy allows the opportunity of all aforementioned parties to anonymously report any suspected wrongdoings or dangers at work. Based on these reports, an investigation is conducted leading to appropriate remediation.

Assessing Risks of Modern Slavery in Our Supply Chain

YNAP uses a combination of tools and actively engages in open dialogue with suppliers to assess human rights risks, including the risks of modern slavery in its supply chain.

YNAP launched its Supply Chain Transparency Programme in 2021 to improve traceability and transparency throughout the supply chains of its private labels (collections which are developed in-house specifically for YNAP customers), in partnership with an external supply chain transparency platform.

All Tier 1 suppliers (manufacturers of final products) for YNAP private labels have been engaged to allow YNAP to gain more information on their business practices and organise on-site audits by third party auditing bodies based on the SMETA methodology where necessary.

The process was divided into two phases:

Phase 1 - In July 2023, YNAP invited its Tier 1 suppliers to respond to a self-assessment questionnaire requesting information regarding human rights and workers' protections, including whether they have policies and processes in place to respect workers' human rights.

Key expectations of the Tier 1 suppliers self-assessment include:

- Policies and procedures in place to ensure that workers are permitted to join unions and raise concerns collectively to management, including through whistleblowing mechanisms and workers' hotlines.
- Provision of written contracts to workers in their own language and in understandable terms.
- Policies and procedures around recruitment of migrant workers, who may be more vulnerable to labour exploitation.
- Policies and procedures for contracting and assessing risks to homeworkers, who may be more vulnerable to labour exploitation.
- Payment of living wages.

The self-assessment questionnaire also included questions about other key indicators that can increase or suggest increased risks of forced labour, e.g., whether there are migrant workers, how migrant workers are recruited and if suppliers use homeworkers.

The Tier 1 self-assessment questionnaire additionally requested information about whether products were sourced from countries and sectors which can be categorised as high-risk for forced labour and other human rights abuses. The categorisation was based on a proprietary risk assessment tool and methodology developed by a third-party advisory firm.

In January 2024, the self-assessment questionnaire was expanded to Tier 2 suppliers of YNAP private labels.

Phase 2 - Based on the outcomes of the self-assessment questionnaires, a third-party advisory firm reviewed the results and categorised suppliers based on their risk level. Suppliers that fell into the highest risk category were audited based on the SMETA methodology (Sedex Members Ethical Trade Audit).

The Four Online Stores have a dedicated 'product edit' which aims to highlight brand partners and their products that are defined as more responsible. Brand partners included in one of the responsible curations undergo an additional assessment process, including responding to questions about their approach to prevent modern slavery, how they assess risks to people in their supply chains, and whether they pay a living wage, among other topics linked to human rights and worker well-being.

Training

YNAP understands the importance of providing regular training on human rights and modern slavery.

YNAP has engaged a Human Rights expert advisory firm to hold training sessions with selected key functions to build internal knowledge of how the risks of modern slavery intersect with business activities.

Employees based in Italy receive training on the Italian Legislative Decree 231/2001 and the Model 231 adopted by YOOX NET-A-PORTER GROUP S.p.A., which aims to provide adequate knowledge, understanding and application of the Model 231 adopted, with a specific focus on the YNAP Code of Conduct.

Supervisory Body (Organismo di Vigilanza)

As a Company established in Italy, YOOX NET-A-PORTER GROUP S.p.A. seeks to ensure propriety and transparency in the conduct of business affairs and activities by formally adopting an Organisation, Management and Control Model ("Model 231") as provided by Italian

Legislative Decree No. 231, dated 8 June 2001 (“Law 231”).

Law 231 establishes a system of administrative liability for legal individuals, companies, and associations, that adds to the liability of the physical individual who is the material perpetrator of the crime, and that aims to involve, in the punishment for the crime, the entities for whose interests or advantages such offence was committed. Such administrative liability exists only in the case of committing one of the crimes listed in the same Law 231, the so-called Predicate Offenses.

Model 231 is an important tool, adopted by the Company, that contains the rules and principles of behavior that everyone (i.e. corporate bodies, employees, associates, consultants, suppliers, business partners and, more generally, all those who, for any reason, work in connection with activities on behalf or in the interests of the Company) must follow in order to prevent the commission of crimes (including crimes relevant for the purpose of this Statements) and, moreover, it is suitable to guarantee carrying out business activities in full respect of the law and limits the risk to incur in company liability.

The YOOX NET-A-PORTER GROUP S.p.A. Board of Directors has assigned the task of supervising the functioning, efficacy, and observance of the Model 231 to an autonomous and independent body with specific powers of initiative and control (known as the “Supervisory Body”). Therefore, the Supervisory Body performs its functions outside the Company’s operative processes, reporting periodically to the Board of Directors, having no hierarchical relationship with the Board itself. The Supervisory Body is composed of two external members and one internal, who, with their competence in legal and administrative matters and in the internal control system, guarantee observance of the requirements included in the Model 231. The Model 231, in fact, specifies and maps the processes in which the crimes it covers might occur. In this sense, the Supervisory Body regularly verifies that the controls which should prevent such crimes are put in place correctly.

Law 231 expressly identifies the crimes (offences and violations) that can trigger the liability of the Company. For the purpose of this Statement, it is specified that YOOX NET-A-PORTER GROUP S.p.A. Supervisory Body also oversees the following crimes:

- Illicit intermediation and labour exploitation (Model 231 - Special Part D).
- Employment of illegally staying third-country nationals (Model 231 - Special Part M).

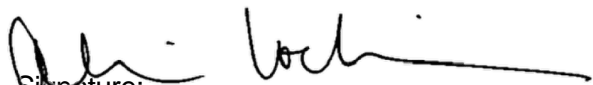
In order to prevent such crimes, YNAP:

- Refrains from engaging in, collaborating with, or causing the carrying out of behaviours such as to integrate, considered individually or collectively, directly, or indirectly, the types of crime provided for by art. 25-quinquies of the Law 231.
- Guarantees classification and remuneration of employees in compliance with national and territorial collective agreements and proportionate to their experience and workload.
- Respects the regulations relating to working hours, rest periods, weekly rest periods, compulsory leave, holidays.
- Applies the regulations on safety and hygiene in the workplace.
- Ensures non-degrading working conditions, surveillance methods and housing situations.
- Refrains from engaging in or participating in the implementation of conducts which, considered individually or collectively, may integrate the crime referred to in Article 25-duodecies of Law 231.
- Refrains from engaging in and adopting behaviours that, although they do not in themselves integrate the crime of employment of illegally staying third-country nationals, may affect the effectiveness of the preventive internal controls instituted.

Looking Ahead

YNAP will continue to work with its private label suppliers and brand partners to identify potential emerging risks and impacts in the supply chain, and furthermore focus on transparency and traceability throughout the supply chain to ensure that risks of modern slavery are identified and addressed.

In 2024, YNAP engaged a third-party business and human rights advisory firm to support the Company on further strengthening its approach to combatting Modern Slavery.



Signature:

Name: Alison Brett Loehnis

Title: Director

For and on behalf of YOOX NET-A-PORTER GROUP S.p.A.

Date: 26th September 2024