BVLGARI

CODE OF ETHICS
New Code of Ethics

Bulgari is renowned worldwide as an emblem of excellence and *savoir faire*. Its authenticity and ability to evolve while always remaining true to the founding values are key aspects of this success.

Such brand leadership in the luxury market is the result of a continuous quest for perfection: our creations are so desirable because they represent the fulfillment of a dream, bringing excitement to our clients’ life with their extraordinary quality.

Now more than ever, leadership is strongly entrenched with credibility. Our customers and stakeholders quite rightly expect that our vocation to excellence is reflected also by the highest standards of integrity in our behaviors and business practices. Moreover, being a global player in an ever changing business environment entails an economic and social responsibility. It also calls us for unceasingly preserving the prestigious image of our brand at all levels.

This commitment has been taken on board by the Company through concrete actions, such as the partnership with Save the Children, the adoption of the Kimberley Process and the membership in the Council of Responsible Jewelry Practices, to mention just the most prominent initiatives.

Anyway, your personal contribution is crucial as well to maintain, implement and enhance the brand’s reputation and scope of activities. This Code of Ethics aims to guide all of us in the everyday conduct of business and to ensure consistency throughout the organization. It has been drafted keeping in mind the values that shaped the brand identity and have always inspired us.

The engagement of everyone in sharing and applying these principles will ensure our long term success.

Jean-Christophe Babin
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I Foreword

This Code of Ethics (hereafter referred to as the “Code of Ethics” or simply the “Code”), is a set of the general rules of ethic to be followed so as to ensure that Bulgari S.p.a. and its direct and indirect subsidiaries (hereafter referred to as the “Bulgari Group” or the “Group”) operate efficiently, are reliable and enable the Group to maintain its good reputation. It represents a basic element of corporate governance models designed to preserve the organization, as well as the levels of efficiency and quality of the Company’s activities, whilst at the same time offering a suitable tool for preventing possible illicit behaviour or situations which may constitute an offense.

This Code represents the foundation stone of the Group’s business culture and is the official document in which the principles of “business ethics” that the Bulgari Group follows are located; the Group’s views are reflected in these principles and all the parties with whom the Group operates, both internally and externally, must consistently adapt themselves to them.

This tool, which needs to be continuously updated as the result of the contribution made by all of its recipients, ensures that ethical principles, which should not be considered exhaustive, are defined explicitly, clearly, unequivocally and in a comprehensible manner and represents the most highly articulated expression of the values that constitute social ethics, the guiding principles and the fundamental directives to which social behaviour and the ethic of every person to whom the Code is directed must conform, within the ambit of their respective competences and in relation to the position they hold in the organisation.

The Bulgari Group will keep all the recipients of this Code, whether employees, managers, directors, collaborators, consultants and third party suppliers informed and aware as to its contents, to ensure that they may carry out their work in full compliance with values and principles therein contained.

II Recipients of the Code

The Code of Ethics is binding and is applicable to the employees of all the companies belonging to the Group that have adopted it, wherever they may have their operations, in Italy or abroad, as well as to the members of the Board of Directors of those companies (or the equivalent bodies if such exist) (hereinafter referred to as the “Recipients”).

The Recipients are held to respect the Code as an essential part of the obligations undertaken as the result of the relationship established within the relevant company. Any breaches of the Code will give rise to disciplinary measures being taken against those Recipients who are employees of Group companies, in accordance with applicable legal and contractual provisions. Furthermore, to the extent that it is relevant, the Code of Ethics is also applicable to Bulgari business partners: external collaborators and consultants who carry out their business in the company’s interest and to suppliers.
III General Principles of conduct

It is an indispensable principle for all the Recipients of this Code always to act in an honest manner, in compliance with the applicable laws and regulations, diligently and in good faith. In particular, the Group considers respect of laws and regulations applicable in all the countries in which it operates to be a value fundamental to its activities. In the event the Recipients become aware of the fact that associated companies or companies in which the Group has suppliers or consultants, in Italy or abroad, are not abiding by the requirements of this Code in carrying out their activities in the interest of or on behalf of the Bulgari Group, they must demand that the Code be followed and, if this should fail, must terminate the relationship.

The Bulgari Group believes in the protection and respect of the individual. Carrying out business activities must therefore ensure that a person’s fundamental values are respected at each and every moment.

The quality and seriousness that the Bulgari Group has accumulated over one hundred years of doing business may be maintained and increased by adopting a conduct that is unquestionable from an ethical standpoint; in particular:

a) Group values

Bulgari has identified certain values which it believes are representative of the Group’s principles of conduct and philosophy; in addition to providing support to the business mission, these values constitute a clear guideline for the daily conduct of each Recipient:

A constant commitment to promoting fair competition, necessary in serving the interests of the company and the Bulgari Group and those of market operators, customers and shareholders in general (“DRIVE FOR SUCCESS”).

The commitment to concentrate professional skills and productive abilities in creating value for the company and the Group (“VALUE CREATION”).

The conviction that the strength and success of the Group is based on its brand and its style (“POWER OF BRAND”).

The search by every employee for excellence in the quality of the Group’s products and services provided to internal and external customers (“EXCELLENCE”).

The belief that each employee is able to contribute to the realisation of the business mission through his or her involvement, assumption of responsibility and personal commitment (“PEOPLE CONTRIBUTION”).

The commitment to place principles such as integrity, clarity and consistency in the foreground in all decisions, with the aim of realising the business mission (“INTEGRITY AND CONSISTENCY”).

The firm persuasion that respect, trust, professional growth, team spirit and a lively environment are an integral part of the Group’s business culture (“ENGAGING ENVIRONMENT”).

b) Human resource management

Human resources represent the foundations of the business. The Group’s success depends on the professionalism and the diligence of human resources.

As a result, the following principles are fundamental to the Group in managing human resources:

- to offer equal opportunities of work and professional development without discrimination on the grounds of race, gender, age, sexual proclivity, physical or mental disability, national origin, religious beliefs or membership of a political party or trades union;
- to ensure a treatment that is fair and based on merit;
to promulgate and consolidate a culture of health and safety in the work environment and to take steps to maintain the good health and safety of employees, especially through preventative action, from both a physical and mental standpoint.

The Group is additionally committed:
- in respecting fundamental human rights;
- in preventing the exploitation of minors;
- in not using any form of forced labour or work carried out in conditions of slavery or servitude;
- in requiring that in both internal and external work relationships no situations arise in which persons are reduced to or maintained in a state of subjugation through the use of violence, threats, deceit or abuse of authority.

More specific information is provided for in the Bulgari “Diversity Policy”.

c) Sustainable Development

Bulgari is committed in conducting its business in a manner that always maintain and improve the highest level of environmental, health and safety performance. This is consistent with the Bulgari commitment to Corporate Social Responsibility.

More specific areas are covered in the Bulgari “Environment health and safety policy”.

IV Business activities and the performance of duties

The manner in which the Recipients of this Code carry out business activities in general and perform their duties in particular must be driven by respect for the general principles of conduct described in Article III. This means that honesty, diligence, abiding by applicable laws and regulations, loyalty, good faith and the protection of the individual are cardinal principles that cannot be breached. Bulgari is committed in maintaining impartial and loyalty relationships with all its partners; recipients must respect organisational and managerial rules to the full, within the limits of business functions.

a) Presents, gifts and other articles of use

Bulgari prohibits any form of corruption. Any payment must reflect a legitimate service requested and performed. The manner in which the Recipients of this Code carry out their work must always be driven by the need for transparency and correctness, and as a result the Group does not allow them (or third parties working on their behalf) to make, receive or give presents, gifts and/or other articles of use, which may even consist solely of action interpreted as exceeding normal business practice or courtesy, which may influence the independence of anyone’s opinion or lead to securing any type of benefit or favourable treatment in conducting any activities that may be linked to the Bulgari Group.

As concerns the receipt of gifts, reference should be made to the prevailing policy issued and published on the intranet portal.

b) Conflicts of interest

For the purpose of carrying out their work with transparency and clarity, it is the duty of the Recipients to avoid all situations and/or activities that may put them in a position of having any conflict of interests with the Group or that may interfere with their ability to take impartial decisions. In the course of its activities, each Company will undertake any measure to avoid creating real or even potential situations of conflict of interest. In addition to the situations of conflict of interest defined by law, these will also include cases in which an employee, collaborator or consultant carries out actions within the sphere of his/her activity and/or assignment which fulfil
a purpose other than that of the Company and its shareholders, in order to obtain a benefit of a personal nature.

By way of example, the following situations could lead to the creation of conflicts of interest:

- having economic interests in suppliers, customers or competitors (the holding of shares, professional engagements, etc.) including those held through family members, meaning by this father, mother, spouse, brothers and sisters, first level legitimate descendants and cohabiting partners;
- working for suppliers, including in this family members working for suppliers;
- carrying out work competitive to that performed for the company to which a person belongs.

If a situation should arise in which a Recipient has a potential conflict of interest with the Group, it will be the employees’ responsibility to determine a course of action in all honesty, taking into account their duty of loyalty towards Bulgari.

The Recipient shall abstain from performing any activities relating to the situation giving rise to the conflict of interest until a decision is taken in this respect and agreed with the respective HR function.

c) Market and free competition

The Group's business activities will be characterized by principles of legality, loyalty and propriety. The Group recognizes that free and fair competition within a market economy is a decisive factor for the growth, development and constant improvement of the Group itself and believes that product quality and brand importance will strive in this context.

d) Use of company time and assets

In order to promote maximum levels of efficiency in performing day to day working activities, Recipients may not carry out any work that is inconsistent with their duties, tasks and organisational responsibilities.

Each Recipient has the responsibility to safeguard and preserve the physical assets and resources (tangible and intangible) entrusted to him or her for the purpose of carrying out his or her duties.

Each Recipient is further required to use such assets and resources in a suitable manner and in conformity with the corporate interest.

Business assets such as premises, equipment and Group company confidential information may not be used for personal purposes.

e) Management of information

In compliance with the provisions of the law, each Company will guarantee the confidentiality of the information in its possession. All Company employees, collaborators and consultants shall be prohibited to use and/or wrongfully disclose confidential information for purposes which are not related to the execution of their activities.

It will be expressly forbidden to use or pass on to others any confidential or internal Company information without a justifiable reason and/or instruction of the Company.

Each Recipient must make him or herself aware of and implement business policies regarding the security of information so as to ensure integrity, confidentiality and availability. The Recipient must draw up his or her documents by using clear, objective and exhaustive language, enabling colleagues, supervisors or authorised external parties to make reference to them as appropriate.

By way of example the following are to be considered as Confidential Information: prototypes, designs, sketches, trademarks and studies relating to products being developed; commercial, management, business and strategic plans; financial operations and transactions or those regarding investments and divestitures; personal employees data; customer lists and lists of
collaborators; and anything else that constitutes the Group’s business, commercial and managerial know-how.

In order to respect market abuse regulations the confidential information must not be used by Recipients in any manner whatsoever to obtain benefits of any kind, whether direct or indirect, immediate or future, asset-related or otherwise.

Each information or material obtained or produced by a Recipient in carrying out or in relation to his or her work is owned exclusively by the company with whom the Recipient has an employment relationship.

V Conduct in relations with the community

a) Customers
The Group’s primary objective in relations with its customers is, within the limits of the possible and by following business procedures, to ensure the maximum satisfaction of the customer, by committing itself to ensuring that services and products are provided to the highest standards of quality. Bulgari cares about the health and safety of its customers through the use of highest standards in the selection of materials and implementation of expertise and is also committed in not making any misleading statement concerning its products and their method of production.

b) Business Partners (suppliers, distributors, subcontractors, commercial partners.....)
In selecting a supplier, as in establishing the terms and conditions for making purchases of goods and services for the Group, Recipients must endeavour to obtain the greatest competitive advantage for the Group itself, selecting the supplier that is capable of supplying goods and services of the quality required under the most favourable terms and conditions; for this reason agreeing to contractual restrictions that could lead to forms of dependence for the supplier or for the Group companies concerned are to be avoided.

The selection of third party collaborators must be based on merit, competence and professionalism. Bulgari prevents the use of so called “conflict diamonds” and purchases only polished diamonds from trusted suppliers based in countries which have adhered to the Kimberley Process, a joint governments, industry and civil society initiative to stem the flow of conflict diamonds used by rebel movements to finance wars against legitimate governments. Responsible Jewellery Council has developed a Certification System which applies to all Members. RJC Members are required to be audited by accredited third party auditors to verify their conformance with the certification system. As a member of the Responsible Jewellery Council, Bulgari shall carry out its industrial activity in accordance with RJC requirements and ensure that all member companies in the production chain comply with such requirements. More info are detailed in the Bulgari “RJC and Conflict Diamonds Policy”.

Bulgari expects its third party suppliers to respect and adhere to the same philosophy in the management of their own activities.
Any supplier must be in compliance with same standards in terms of employment requirements and responsibilities (fight of child labour, forced labour, abuse, discrimination and so on) and environmental requirements and responsibilities.
Each Recipient must ensure that every third party collaborator receives a treatment based on loyalty, clarity in communication and professionalism, as well as having a method of working that is in conformity with prevailing laws and regulations.
Bulgari will inform all of its commercial partners of its ethical principles and expectations, asking them to comply with through a formal letter of commitment.
c) Public Institutions
Relations with national, EU and international public institutions (Institutions), as well as with public officials or public service officers, as well as authorities, representatives, agents, exponents, members, employees, consultants, public function or service officers, public institutions, public administration, public bodies, even of an economic nature, public bodies or companies of a local, national or international nature (Public Officials), will be held in compliance with current regulations and based on general principles of loyalty solely for the specific purpose of obtaining any authorisations required to carry out business activities, for assessing the implications of regulations on business activities or for the need to reply to requests made by the Public Administration to the relevant company of the Group.
Relationships with the Public Institutions must at all times be clear, transparent and correct so as not to bring to ambiguous or misleading interpretation. In particular, Recipients must not attempt to influence the decisions taken by the Public Institution by improper means, must not examine or propose commercial opportunities that might benefit employees of the Public Institution personally, must not solicit or obtain confidential information that could compromise the integrity of both parties or examine or propose job opportunities regarding Public Officials or their family members with the aim of influencing the decisions taken by the Public Institution by improper means. Furthermore, companies belonging to the Group may not make direct or indirect contributions or loans of any type whatsoever nor may they set aside funds to support public parties belonging to the Public Institution, other than within the limits permitted and provided for by prevailing laws and regulations and on condition that they have been properly approved by the competent business functions, are properly documented and do not create a conflict of interest for any of the Recipients.

d) Political and trades union organisations
Recipients shall avoid promising or making payments or benefits of any type in the name of and/or on behalf of the Group in favour of political and trades union organisations or representatives of these organisations, other than within the limits permitted and provided for by prevailing laws and regulations and on condition that they have been properly approved by the competent business functions, are properly documented and do not create a conflict of interest for any of the Recipients. Payment of money to political parties, trade unions, or also cultural organisation in an attempt to promote a particular interest or obtain or maintain an advantage is prohibited. Recipients agree and accept that any involvement on their behalf with political or trades union organisations or activities (excluding any necessary contacts or contacts instrumental in performing the institutional activities of the personnel office of Group companies) shall take place solely in their personal name, in compliance with prevailing law and not on behalf of the Group.

e) Promoting dialogue with employee representatives
Bulgari encourages quality dialogue and consultation with employee representatives as well as the respect and consideration for employee representatives in each of the countries where it has a presence.

f) Grants and sponsorship
In order to make a contribution to the well-being of the community and its development, the Group is actively committed to making financial donations or donations of other kinds to not-profit bodies or associations and to sponsoring activities (which do not form part of activities
sponsored for the commercial promotion of products), provided that such activities are properly documented and do not create a conflict of interest for any of the Recipients.

g) Transparency of accounting information
Accounting transparency is founded on the truth, accuracy, completeness and reliability of the documentation supporting business operations and of the respective accounting entries. The activities and deeds performed by the Recipients as part of their work must be documented in compliance with the applicable laws through the use of accurate, complete and reliable documentation and if required by laws and regulations and by the applicable accounting standards must be correctly represented in the accounting books and records on a timely basis. This documentation must be prepared in a manner sufficient for the characteristics of the transactions and the reasons for which they were performed so as to be identified in the event of checks and controls, as well as to enable the authorising parties, carrying out and/or accounting for the transaction to discern its content.

In addition, in order to ensure that the rules of this Code are respected, the person in charge of authorising a specific transaction must be different from the persons accounting for, performing and controlling the transaction.

VI Safeguarding privacy
In order to safeguard the privacy, the Group is committed to processing the confidential information relating to collaborators in a suitable manner and in compliance with the respective prevailing laws and regulations, so as to ensure that there is the maximum transparency for the persons concerned and that third parties do not have access, other than for grounded and exclusive reasons of work.

VII Internal control system
The Internal Control System consists of a set of rules and procedures which aim to (i) ensure the reliability and integrity of accounting and management data and (ii) guarantee that operations comply with all existing rules and regulations, safeguarding the value of corporate assets. The Board of Directors has the responsibility for the internal control system, setting up directives for the management of business risks, verifying on a periodic basis that is effectively working and adequate, and ensuring that the main business risks are identified and suitably managed. All the Recipients are responsible for ensuring that the internal control system is working properly within the scope of their functions.

VIII Supervision, circulation and revision of the Code of Ethic
The Board of Directors is in charge for approving the Code of Ethic. Any further revision will be approved by the Chief Executive Officer. HR and Internal Control functions have the task of supervising that this Code is being applied and respected. Any breaches of the Code must be brought to the their attention.

Any employee having reason to believe that a provision of this Code may have been breached, or who wants solely to raise a question or simply has doubts, must speak about this with the relevant Human Resources department, which in its turn will inform the Internal Control if necessary or opportune. The Human Resources function shall have the responsibility for taking decisions in the event of any breach of this Code, if any.

Any matters raised will be treated with the maximum confidentiality and discretion. An employee reporting a potential breach of these regulations has the right to anonymity: this confidentiality and/or anonymity will be respected save the obligations of law. No employee shall be penalised
nor will he or she be liable to action of any nature for having drawn attention to potential breaches of the regulations in good faith or for having requested explanations as to how alleged breaches should be handled.

The application of disciplinary sanctions is independent from the outcome of any criminal or civil proceedings, since the rules of conduct imposed by this Code are effective independently of jurisdiction irrespective of the crime or unlawful action that any conduct may constitute.

Corporate HR is in charge for circulation and revision of this Code of Ethic asking for support to other organizational units involved, if necessary.

Each Recipient will countersign a copy of this Code in full sign of acknowledgment of its content; the relevant Human Resources function will prepare and implement a training plan to ensure everyone is familiar with it.

**IX Effective date and coordination with business procedures**

The effect of circulating the Code of Ethic throughout the companies of Group is to make it applicable and binding on the conduct of their employees, directors and collaborators and the members of their controlling bodies.

The Code does not replace current and future business procedures which continue to be effective to the extent that they are not in conflict with the Code itself. In order to protect its reputation and safeguard its resources the Bulgari Group will not have relations of any kind with parties which do not have the intention to abide rigorously by prevailing laws and regulations and/or which refuse to conduct themselves in accordance with the values and principles of this Code of Ethic.