



Bellandi S.p.A. Transparency and Sustainability Policy

Version 5.0

BELLANDI S.P.A.

Document: Transparency and Sustainability Policy

Version: 5.0

Issue date: 12/05/2026

Effective date: 12/05/2026

Approved by: Management of Bellandi S.p.A.

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1. Introduction

Bellandi S.p.A. considers transparency, responsibility and sustainability to be integral elements of its way of operating in the textile sector.

The Company recognizes that the quality of a textile product does not depend solely on its aesthetic, technical and performance characteristics, but also on the way in which it is designed, developed, produced, documented and communicated throughout the value chain.

Through this Policy, Bellandi S.p.A. defines the principles guiding its commitment to transparency, environmental responsibility, social responsibility, responsible supply chain management, documentary traceability and the correct communication of sustainability-related information.

This Policy complements the Corporate Code of Ethics and Conduct and the Supplier Code of Conduct, which respectively govern the principles of corporate conduct and the minimum requirements applicable to suppliers, subcontractors, consultants, commercial partners and other parties involved in the value chain.

The graphic or commercial reference to “Bellandi Group”, where present, identifies the system of brands, activities and production relationships attributable to the Bellandi ecosystem. The formal commitments set out in this Policy are undertaken by Bellandi S.p.A., within the limits of its operational scope, its degree of control or influence and the documentation actually available.

This Policy is conceived as a framework document and not as a standalone instrument: in order to be effective, it must be connected to supplier qualification processes, documentary collection, management of non-conformities, verification of claims, internal training and progressive monitoring. Its adoption does not, in itself, constitute proof of the achievement of specific environmental or social performance levels, which must be demonstrated through data, evidence and verifiable documentation.

This Policy takes into account, where relevant and according to the operational scope of Bellandi S.p.A., the European legislative and regulatory framework relevant to the textile sector, sustainability reporting, the communication of environmental and social information and the responsible management of the value chain.

In particular, the Policy considers the development of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), where applicable, as well as the relevant rules and requirements concerning chemicals, wastewater discharges, waste management, consumer protection, unfair commercial practices and environmental communications.

With regard to environmental and social claims, Bellandi S.p.A. adopts an approach based on accuracy, verifiability, clarity of scope and the availability of documentary evidence, also in light of Directive (EU) 2024/825 on empowering consumers for the green transition through better protection against unfair practices and through better information, and of developments in European legislation on the prevention of greenwashing. The development of this regulatory framework is one of the criteria determining the periodic review of this Policy.

2. Scope of application

This Policy applies to Bellandi S.p.A., its operational, commercial and organizational activities, and guides relationships with employees, collaborators, suppliers, production partners, customers and other relevant stakeholders.

For activities carried out by suppliers, subcontractors, consultants, commercial partners, third-party processors or other entities involved in the value chain, Bellandi S.p.A. promotes alignment with the principles of this Policy through qualification criteria, documentary requests, collaboration, monitoring and progressive improvement.

The principles described herein are applied according to the actual role of Bellandi S.p.A. in the value chain, its operational scope, the degree of control or influence that may be exercised, the availability of data and verifiable documentation.

This Policy does not replace applicable legal obligations, contractual requirements, technical specifications, customer specifications, certification standards or corporate procedures, but complements them within a general framework of responsibility, transparency and fairness.

3. Operational definitions

For the purposes of this Policy:

Bellandi S.p.A. / the Company: the legal entity to which the formal commitments defined in this document refer.

Value chain: the set of parties, processes, materials, operations, services and relationships that contribute, directly or indirectly, to the development, production, commercialisation, documentation and communication of the products and activities of Bellandi S.p.A.

Suppliers and production partners: external parties that provide Bellandi S.p.A. with materials, products, operations, services or technical, production, commercial or organizational support.

Traceability: the ability to collect, organize and retain information and documents relating to materials, suppliers, batches, production stages, certifications, processes and parties involved, with a level of detail consistent with the specific item, batch, process or applicable scope.

Verifiable documentation: documents, records, certificates, declarations, tests, technical data sheets, registers, audit evidence or other supporting materials suitable for demonstrating, within the limits of the applicable scope, the accuracy of the information communicated.

Preferred materials: materials which, in relation to the specific item and its supply chain, have documentable environmental, social, traceability or certification characteristics. The term does not, in itself, imply an absolute environmental benefit or general applicability to all products.

Sustainability claim: any statement, communication or reference relating to environmental, social, ethical, traceability, certification, origin, recycled-content, chemical-management, impact, quality or durability aspects, intended for customers, consumers or external stakeholders.

Where applicable / where relevant: expressions indicating that a requirement or principle must be assessed in relation to the role of Bellandi S.p.A., the type of activity, material, process, item, batch, destination market, customer requirements, applicable standard and available documentation.

4. General principles

Bellandi S.p.A. guides its approach to sustainability according to the following principles:

Transparency: providing clear, accurate, understandable and documentable information consistent with the actual scope of the activities and the evidence available.

Responsibility: operating in compliance with applicable legislation and adopting management criteria aimed at preventing environmental, social, ethical and reputational risks.

Traceability: progressively collecting data and documents relating to materials, processes, suppliers, batches and production stages, according to a level of detail proportionate to the specific item, process or commercial relationship.

Integrity: acting correctly, honestly and in accordance with the principles defined by the Corporate Code of Ethics and Conduct.

Supply chain collaboration: involving suppliers, production partners and relevant stakeholders in sharing applicable requirements and in progressively improving documentary, environmental, social and quality practices.

Continuous improvement: adopting actions proportionate to impacts, risks, opportunities, the degree of control that may be exercised and the level of maturity of corporate systems.

Responsible communication: avoiding generic, absolute, unsubstantiated or potentially misleading statements, favouring prudent and verifiable communications referring to a clear scope.

5. Transparency and traceability

For Bellandi S.p.A., transparency consists of the ability to make available relevant, understandable and documentable information concerning its activities, products and value chain.

According to data availability and the applicable scope, the Company develops, maintains and updates processes and tools useful for collecting, organizing and verifying information relating to:

- raw materials and materials used;
- suppliers and partners involved;
- batches, items and applicable technical references;
- internal and external processing stages;
- applicable certifications, standards and declarations;
- technical, quality and documentary requirements requested by customers;
- relevant environmental and social aspects, where measurable and relevant;
- any evidence of compliance required by legislation, specifications, standards or commercial agreements.

Bellandi S.p.A. recognizes that traceability is an essential requirement for supporting accurate claims, technical documentation, product certifications and market sustainability requests.

The information communicated to customers, stakeholders and external parties must be consistent with the actual scope of the documentation available, the applicable standards and the level of verification achieved for the specific item, batch, material, process or commercial relationship.

6. Environmental responsibility

Bellandi S.p.A. is committed to managing the environmental aspects connected with its activities according to an approach based on regulatory compliance, risk prevention, monitoring, technical innovation and progressive improvement.

The Company pays particular attention to environmental aspects relevant to the textile sector, including:

- chemical management;
- the quality of wastewater discharges and compliance with applicable requirements;
- the responsible use of energy, water, raw materials and other resources;
- the proper management of waste and process scrap;
- the efficiency of production, logistics and documentary processes;
- the selection, verification and documentation of materials;
- the quality, reliability and technical consistency of products in relation to their intended use;
- the collection and periodic updating of available environmental data, prioritizing the aspects of greatest relevance to the textile sector.

Bellandi S.p.A. promotes the adoption of technical and management tools aimed at improving control of environmental aspects throughout the stages of its activities and, where applicable, throughout the supply chain.

The Company's environmental commitments must be interpreted in relation to its actual operational scope, directly managed processes, processes entrusted to third parties, the degree of influence that may be exercised and the documentation available.

7. Chemical management

Chemical management is a priority area of Bellandi S.p.A.'s environmental responsibility.

The Company adopts an approach aimed at reducing chemical risks throughout the production supply chain, with reference to applicable regulatory, technical, contractual and market requirements. As part of its chemical due diligence, Bellandi S.p.A. carries out tests on incoming raw materials and semi-finished products and controls on finished products, verifying compliance with its corporate PRSL (Product Restricted Substances List). ZDHC MRSL requirements are applied where relevant in relation to materials, processes, customers, specifications or destination markets.

Bellandi S.p.A. is committed to:

- promoting compliance with applicable legislation on chemicals;
- requesting and managing relevant chemical information from suppliers and production partners involved in dyeing, finishing, treatment or other processes with potentially significant chemical impacts;
- encouraging the use of products and processes that comply with the requirements defined by applicable legislation, customer specifications, specifications or corporate protocols;
- requesting, where relevant, safety data sheets, declarations, tests, certificates or other suitable evidence;
- collaborating with partners and suppliers to progressively improve chemical-risk management;
- communicating information relating to chemical management in an accurate, verifiable manner consistent with the documentation available.

Bellandi S.p.A. avoids presenting alignment with specific chemical protocols, lists or standards as applying generally to its entire production unless adequate documentary evidence is available and refers to the declared scope.

8. Water, wastewater discharges and production processes

Bellandi S.p.A. recognizes that the management of water, wastewater discharges and production processes is a relevant issue for the textile sector, particularly in processes involving the use of water, energy, chemicals or specific treatments.

- According to its direct or indirect role in the relevant processes, the Company is committed to:
- promoting compliance with applicable legislation on wastewater discharges, emissions, treatments and environmental authorizations;
- requesting that suppliers and production partners involved in relevant processes make available pertinent authorizations, records, analyses, controls or other documentary evidence;
- monitoring, where applicable, the information available relating to dyeing, finishing, washing, chemical treatment or other processes with potentially significant environmental impacts;
- promoting the proper management of process water and wastewater discharges according to applicable regulatory and technical requirements;
- assessing, in collaboration with the partners involved, any improvement actions in the event of critical issues, non-conformities or specific customer requests;
- communicating any information relating to water, wastewater discharges or production processes only when supported by verifiable data, documents or evidence.

For processes not directly managed by Bellandi S.p.A., the Company promotes control through documentary requests, qualification criteria, collaboration with production partners and, where necessary, checks or corrective actions proportionate to the risk.

9. Resources, waste and process improvement

Bellandi S.p.A. promotes the responsible use of resources and the proper management of waste and scrap arising from its activities, as well as from activities entrusted to third parties where relevant to the commercial relationship.

The Company is committed to:

- reducing, where possible, inefficiencies and waste in development, sampling, production and document-management processes;
- promoting the recovery, valorization or proper disposal of scrap in accordance with legislation;
- improving the documentary management of material flows and related evidence;
- assessing, where technically and economically feasible, technical and organizational solutions capable of progressively reducing environmental impacts;
- promoting greater internal awareness of the responsible use of resources;
- requesting from suppliers, where relevant, documentation relating to the management of waste, scrap, contaminating materials or other fractions subject to specific regulatory requirements.

Any communication relating to reductions in impacts, resource savings, recovery or valorisation must be supported by data or evidence relating to a defined scope.

10. Preferred materials, certifications and product claims

Bellandi S.p.A. promotes, where technically, qualitatively and commercially applicable, the use of materials with documentable environmental, social, traceability or certification characteristics.

Standards and schemes that may apply to specific products, materials or supply chains include, by way of example:

:

- Responsible Wool Standard (RWS);
- Responsible Alpaca Standard (RAS);
- Responsible Mohair Standard (RMS);
- Global Recycled Standard (GRS);
- Global Organic Textile Standard (GOTS);
- Organic Content Standard (OCS);
- Masters of FLAX FIBRE™;
- OEKO-TEX® STANDARD 100.

Reference to these standards does not imply that all Bellandi S.p.A. products, materials or items are certified or covered by these schemes.

Applicability must always be assessed in relation to the specific item, composition, batch, certified scope, chain of custody and documentation actually available.

Bellandi S.p.A. is committed to avoiding generic or absolute statements concerning the sustainability of materials, favoring accurate and verifiable claims consistent with certificates, transaction certificates, scope certificates, technical data sheets, declarations of conformity or other suitable documentation.

Claims relating to recycled content, origin, certification, composition, traceability or environmental or social characteristics must refer to the specific product, material, batch, item, process or applicable scope.

11. Responsible design, quality and durability

Bellandi S.p.A. recognizes that the quality, reliability and technical consistency of a textile product in relation to its intended use can contribute to more responsible design where these characteristics are supported by applicable requirements, tests or documentary evidence.

The Company promotes a design approach that takes into account:

- the intended use of the product;
- required technical performance;
- stability, resistance and reliability;
- composition and selection of materials;
- production processes and applied finishes;
- consistency between development, sampling and production;
- the possibility of documenting relevant product characteristics.

Bellandi S.p.A. is committed to developing products consistent with customers' technical, aesthetic and production requirements, avoiding solutions that are not adequately supported by technical or documentary evidence.

Any statements relating to quality, resistance, service life, performance or the retention of characteristics over time must be supported by tests, technical specifications, quality controls, specifications or other relevant evidence.

12. Social responsibility and human rights

Bellandi S.p.A. is committed to respecting fundamental human rights, workers' rights and applicable legislation on labour, health, safety and equal treatment.

The Company recognizes the following as fundamental principles:

- freedom of association and collective bargaining;
- prohibition of child labour;
- prohibition of forced, compulsory, bonded or mandatory labour or labour deriving from human trafficking;
- protection of health and safety in the workplace;
- prevention of discrimination, harassment, abuse and conduct detrimental to personal dignity;
- regular employment relationships;
- compliance with working hours and due remuneration;
- protection of confidentiality and personal data.

These principles are governed, with regard to internal corporate conduct, by the Corporate Code of Ethics and Conduct / Codice Etico e di Condotta Aziendale and, with regard to the supply chain, by the Supplier Code of Conduct / Codice di Condotta per i Fornitori.

Bellandi S.p.A. requires its suppliers and partners to operate in compliance with applicable legislation and the social, ethical and labour requirements defined in the relevant corporate documents.

13. Responsible supply chain management

Bellandi S.p.A. considers collaboration with suppliers and production partners to be essential for ensuring quality, continuity, compliance, traceability and transparency. Responsible supply chain management requires an approach proportionate to risk, based on qualification, communication of requirements, collection of evidence, monitoring, any checks and management of corrective actions. The Supplier Code of Conduct is one of the instruments of this approach, but it must be supported by consistent operational and documentary activities. The Company requires its suppliers, subcontractors, consultants and commercial partners to adhere to the Supplier Code of Conduct / Codice di Condotta per i Fornitori, which defines the minimum requirements relating to legal compliance, integrity, human rights, working conditions, health and safety, environmental protection, chemical management, traceability, confidentiality, data protection and conflicts of interest.

Bellandi S.p.A. promotes responsible supply chain management through: supplier-selection and qualification criteria;

- requests for technical, environmental, social and certification documentation, where relevant;
- communication of applicable corporate requirements;
- progressive monitoring of available information;
- collaboration in managing any non-conformities;
- periodic reassessment of relevant suppliers on the basis of the criteria defined in the applicable qualification procedures;
- the right to verify compliance with the requirements defined in the applicable corporate documents;
- risk assessment according to activities, materials, processes, previous critical issues and relevance to quality, compliance, traceability or certifications.

In the event of significant breaches or failure to align with the required principles, Bellandi S.p.A. may assess corrective measures, suspension or termination of the commercial relationship, in accordance with the Supplier Code of Conduct and the applicable agreements.

14. Ethics, integrity and corporate conduct

Bellandi S.p.A. operates according to principles of fairness, integrity, legality, responsibility and compliance with applicable legislation.

Matters relating to ethical conduct, anti-corruption, prohibition of bribery, accuracy of books and records, internal control, confidentiality, protection of personal data, whistleblowing and the disciplinary system are governed by the Corporate Code of Ethics and Conduct.

This Policy refers to these principles as an integral part of the Company's sustainability approach.

15. Responsible communication and prevention of greenwashing

Bellandi S.p.A. is committed to communicating information relating to sustainability, materials, certifications, traceability and environmental or social impacts in an accurate, proportionate and verifiable manner.

The Company is committed to avoiding:

- generic or absolute statements not supported by evidence;
- environmental or social statements that do not refer to a clear scope;
- claims that are inconsistent with the documentation available;
- improper use of certifications, standards, logos or regulatory references;
- communications that may lead customers, consumers or stakeholders to misleading interpretations;
- statements presenting as generally applicable a requirement that applies only to specific products, batches, materials, processes or supply chains.

Statements relating to certified materials, recycled content, origin, traceability, chemical requirements, quality, durability or environmental characteristics must be supported by adequate documentation and refer to the specific product, batch, item, process or applicable scope.

Any external communication relating to sustainability must be formulated prudently, be documentable and be consistent with the information actually available.

Before sustainability claims are disseminated, the Communication/Marketing function obtains written confirmation from the competent function - Quality, Sustainability or Procurement - that supporting documentation is available.

16. Governance, responsibilities and internal roles

The Management of Bellandi S.p.A. approves this Policy and promotes its application within the organization. The corporate functions involved in product development, procurement, quality, production, sustainability, sales, administration and communication processes contribute, according to their respective responsibilities, to the implementation of the principles defined by this Policy.

The allocation of responsibilities may be defined through procedures, operating instructions, job descriptions, delegations or internal matrices. In general, implementation of the Policy involves the coordinated participation of Management, purchasing/procurement, sustainability/compliance, quality, production/product development, sales, communication, administration and, where applicable, legal and human resources.

- **Management:** approves the Policy, defines general guidelines and assesses any relevant critical issues.
- **Purchasing / procurement / supplier management:** contributes to supplier qualification, documentary collection, communication of applicable requirements, integration of the Code into commercial relationships and proposals for the periodic updating of supply chain requirements.
- **Quality / product technical function:** verifies the technical, quality and documentary consistency of materials, items, tests and product requirements.

- **Sustainability / compliance, where present:** coordinates or supports the collection of ESG evidence, the verification of claims and the monitoring of applicable requirements.
- **Production / product development:** contributes to the management of information relating to production stages, processes, samples, operations and technical changes.
- **Sales:** manages customer requests, ensuring that shared information is consistent with the documentation available.
- **Communication / marketing:** formulates claims and external content in compliance with the principles of responsible communication and subject to prior verification of the relevant evidence.
- **Administration / legal, where applicable:** supports the management of contracts, declarations, records, data and relevant regulatory obligations.

Where a responsibility is not specifically assigned, Management or the function appointed by it identifies the most appropriate contact person according to the matter concerned.

17. Monitoring, documentary evidence and indicators

Bellandi S.p.A. is committed to progressively monitoring the application of this Policy through a system proportionate to the Company's size, role and risks in the value chain.

Monitoring may include documentary assessments, questionnaires, internal ratings, audits, second-party checks, corrective-action plans, training and supplier updates. By way of example, it may concern:

- the collection and updating of relevant documentation;
- verification of requirements applicable to materials, suppliers and processes;
- management of customer requests;
- internal training and awareness-raising;
- assessment of any non-conformities;
- definition of corrective or improvement actions, where necessary;
- prior verification of sustainability claims for external communication;
- periodic updating of the evidence available.

By way of example, Bellandi S.p.A. may monitor indicators such as:

- percentage of relevant suppliers that have signed the Code of Conduct;
- number of suppliers qualified or reassessed;
- number of completed documentary requests;
- number of audits or documentary checks carried out;
- number of identified non-conformities and closure of corrective actions;
- number of sustainability claims verified before publication;
- availability of certificates, transaction certificates, scope certificates, technical data sheets, declarations or tests for specific items or batches;
- documentary coverage of chemical requirements, where applicable.

The indicators actually adopted, their monitoring frequency and the related responsibilities are defined by the applicable corporate procedures or specific internal plans.

18. Reporting and management of non-conformities

Bellandi S.p.A. promotes an approach based on transparency, responsibility and the timely management of any conduct that does not comply with corporate principles.

The operating methods for reporting, the available channels and the applicable protections are described in the Corporate Code of Ethics and Conduct, the Supplier Code of Conduct and the applicable corporate procedures, made available to the relevant stakeholders according to the methods defined by the Company.

Bellandi S.p.A. is committed to ensuring, in accordance with the applicable corporate documents and current legislation, the confidentiality of reports and the protection of the parties involved.

Identified non-conformities may be managed through requests for clarification, collection of evidence, root-cause analysis, definition of corrective actions, verification of the effectiveness of the actions taken and, in more serious cases or in the event of failure to collaborate, proportionate measures in accordance with the applicable agreements.

19. Training and awareness-raising

Bellandi S.p.A. promotes internal knowledge of the principles of transparency, sustainability and responsibility defined in this Policy.

The Company is committed to encouraging information, training and awareness-raising activities addressed to the corporate functions involved in the most relevant processes, with particular attention to:

- document management;
- traceability;
- customer requirements;
- certifications;
- chemical management;
- management of suppliers and production partners;
- responsible communication and prevention of greenwashing;
- ethical and behavioral principles defined by the corporate codes;
- management of non-conformities and documentary evidence.

Training activities are defined according to the roles, responsibilities, risks and operational needs of the functions involved.

20. Updates and review

This Policy is subject to periodic review, at least annually or in the event of relevant changes relating to:

- applicable legislation;
- sustainability standards;
- corporate scope;
- management systems;
- customer requirements;
- environmental, social or supply chain risks;
- corporate strategy;
- updating of related corporate documents;
- significant changes in processes, materials, the supply chain or communication methods.

Each update must be approved by Management and communicated to the relevant corporate functions.

The Company retains evidence of the current version and, where necessary, of the principal changes made compared with previous versions.

21. Approval

This Transparency and Sustainability Policy is approved by the Management of Bellandi S.p.A. and made available to the people within the organization and, where appropriate, to external stakeholders.

Montemurlo, 12/05/2026

Management
Bellandi S.p.A.

Bellandi S.p.A. Transparency and Sustainability Policy

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