

GLOBAL ANTI-CORRUPTION AND BRIBERY POLICY

PURPOSE:

The purpose of this document is to define Lanvin Group Holdings Limited's (including its subsidiaries, the "Company") policy regarding compliance with the United States Foreign Corrupt Practices Act ("FCPA") and other anti-corruption laws, collectively ("Anti-Corruption Acts"), and employee responsibilities for compliance with these policies. The Anti-Corruption Acts prohibit improper payments including bribes, kickbacks, excessive gifts or entertainment, or any other payments made or offered to obtain an undue business advantage. This policy applies to the Company's employees, vendors, licensees, joint venture partners, customers, and third parties that work on behalf of the Company.

POLICY:

The Company is committed to conducting business ethically and in compliance with applicable laws and regulations, including the Anti-Corruption Acts, that prohibit improper actions to gain a business advantage. The Company and its subsidiaries are required to comply with the provisions and statements of Anti-Corruption Acts. This applies to all business activities, anywhere in the world, whether they relate to a government official or a commercial entity. Failure to do so can result in significant criminal and other penalties for the Company as well as individuals. Actual and perceived violations of the Anti-Corruption Acts can also tarnish the Company's reputation. It is, therefore, essential that Company employees, vendors, licensees, joint venture partners, customers, and other third parties working on behalf of the Company's understand and comply with the Anti-Corruption Acts. Company personnel should maintain a professional and ethical business relationship with vendors, licensees, joint venture partners, customers, government officials, and third-party distributors.

OUR POSITION IS CLEAR:

The Company does not offer or accept bribes or kickbacks in any form, and we do not tolerate corruption in connection with any of our business dealings. Corruption is an abuse of power that involves acting dishonestly or improperly in return for money, personal gain, or anything of value. It can take many forms and is not limited to interactions with the government. By wrongly benefiting a few individuals who abuse their power or position, corruption undermines respect for the rule of law, creates unfair competition, slows economic development, damages innovation, and contributes to governmental and social instability. For the Company, involvement in bribery or corruption can result in lasting damage to our brand and our reputation, a breakdown in consumer and shareholder confidence, and inferior products.

SCOPE:

This policy applies to all officers, directors, and employees of the Company, its vendors, licensees, joint venture partners, customers and other third parties working on behalf of the Company, as well as those of domestic and foreign subsidiaries or any other entities that are controlled or are under common control of the Company. Each officer and employee of the Company has a personal responsibility and obligation to conduct business activities ethically and in compliance with the Anti-Corruption Acts, and all Company compliance policies and procedures. Failure to do so may

result in disciplinary action up to and including dismissal and / or prosecution.

APPLICABLE LAWS

The FCPA is a criminal statute that prohibits payments to government officials to corruptly influence performance of their official duties. It is unlawful for any United States company or company whose securities are listed in the United States and its employees or agents to offer, promise, pay, or authorize the payment of anything of value to any Foreign Official to help the Company obtain or keep business or secure some other business advantage. This prohibition applies whether the offer or payment is made directly or through another person. Along with prohibiting improper payments, the FCPA requires United States companies and companies whose securities are listed in the United States and their affiliates to keep accurate books and records of transactions in which they engage and to maintain a system of internal controls that, among other things, can prevent any off-the-books accounts that might be used to facilitate or conceal questionable foreign payments. These requirements apply to all business activities, not just those involving foreign officials. Penalties for violating this law can be severe both for the Company and the individual. For companies, sanctions can range from fines and loss of any business profits from an improper payment to loss of export privileges or eligibility to compete for United States government contracts. These are in addition to any reputational damage and investigation / defense costs. Penalties for individuals can include substantial fines and imprisonment.

PROHIBITED CONDUCT

The Company's employees are prohibited from directly or indirectly offering, giving, soliciting or receiving improper payments, gifts or inducements of any kind to and received from any person or organization. The Company does not tolerate the making of payments or payments in-kind (gifts, favors, etc.) to influence individuals to award business opportunities or to make a business decision in the Company's favor regardless of local custom or practice. In international business, in particular, employees or contractors may sometimes come under pressure to make payments or payments in-kind to induce others improperly to grant permits or services to which we would not generally be entitled. In accordance with the Anti-Corruption Acts, prohibits offering, promising, or giving anything of value to assist the Company or individual in obtaining or retaining business or to obtain any improper advantage. It is also unlawful to make payments to agents, sales representatives or other intermediaries while knowing or having reason to know that any portion of the payment will be used illegally. The following concepts are essential to understanding the scope of this prohibition:

- Corruption – Obtain or attempt to obtain a personal benefit or business advantage through improper or illegal means. Corruption includes activities such as bribery, extortion, and kickbacks.
- Bribery – Offer to give or receive anything of value with the intent to corruptly influence a person's actions or decisions in order to gain any business or other improper advantage. Anything of value includes tangible or intangible benefits such as cash, entertainment, charitable contributions, or other gifts or courtesies.
- Extortion – Obtain money or some other thing of value by the abuse of one's office or authority.
- Kickback – Two parties agree that a portion of sales or profits will be improperly given, rebated or kicked back to the purchaser in exchange for making the deal.
- Directly or indirectly – If you are prohibited from making any payment, gift, offer, or promise

directly, you are also prohibited from making it indirectly. You may not instruct, authorize, or allow a third party to make a prohibited payment on your behalf, and you may not make a payment to a third party knowing or having reason to know that it will likely be given improperly.

Facilitating Payments for Routine Governmental Actions

The Company prohibits payments to expedite or secure the performance of routine governmental actions, which is ordinarily and commonly performed by an officer or employee of a foreign government, or any department, agency thereof.

Gifts

The Company's employees, vendors, licensees, joint venture partners, customers, and third parties must not accept or give gifts or paid-for entertainment (other than of nominal value), loans (of any amount), or other favors from a vendor, prospective vendor or any other person with whom the Company does, or may do, business. Receiving such items or favors may compromise – or appear to compromise – the ability to make objective, impartial, and fair business decisions. Offering or receiving any gift, gratuity, or entertainment that might be perceived to unfairly influence a business relationship must be avoided. The Anti-Corruption Acts prohibit providing cash or anything else of value (such as gifts, business meals or entertainment) to individuals to obtain or retain business, or to secure any improper advantage. Reasonable and customary business gifts, meals and entertainment that may be incurred in the ordinary course of business are permitted. However, there are some important rules that must be followed:

- No improper influence or special treatment: Never give or receive anything of value to influence a decision or obtain special treatment.
- No cash: Cash or cash equivalents (such as gift certificates, checks, or gift cards that are greater than nominal value) are never acceptable business gifts (there are sales initiatives, approved by the respective responsible person, that provide gift certificates for specified contests that are acceptable tied to specific performance targets).
- Infrequent: Frequent gifts to the same individual, even if inexpensive, are not appropriate.
- Transparency: The gift must be given openly, at an appropriate time and circumstance—not secretly, or through a third party.
- Understand local laws: Examine a country's local laws prior to giving or receiving any gift to ensure compliance.

Employees and agents must obtain approval from their line manager, LANVIN GROUP's legal department, as well as any other approvals required by Company policy, before accepting any gift or entertainment of more than nominal value from a vendor, prospective vendor, or any person whom the Company does, or may do, business. When in doubt, advice should be sought from the Company's legal department.

Charitable Contributions

Employees and agents of the Company are encouraged to support the charitable efforts of the communities in which they live and where the Company does business. Under no circumstances, however, should an employee or agent, either directly or indirectly, be subject to pressure to support, by way of individual contributions or charitable endeavors, any charitable organization in order to

influence individuals to award business opportunities or to make a business decision in the Company's favor.

Other

In addition to the transactions described above, the following are also prohibited under the Anti-Corruption Acts:

- Covering or reimbursing expenses of a government official or third party.
- Offers of employment or other benefits to a family member or friend of the individual.
- Investment opportunities.
- Stock options or positions in joint ventures.
- Favorable or steered contracts.

Payments made by third parties can result in legal liability for the Company and its employees and so are governed by the same principles in this policy. Willful ignorance is not a defense when third parties participate in bribery or corruption. Be aware of any "red flags" when dealing with third-parties including:

- A reputation for accepting or offering bribes.
- Invoices without detailed expenses or lump sum requests.
- Requests for unreasonably large payments.
- Relationships with government officials.
- Insistence on using a certain sub-contractor when there is no added value.

RECORD KEEPING REQUIREMENT

The Anti-Corruption Acts also require companies to maintain reasonably detailed books, records and accounts, as well a system of internal accounting controls. These records should reflect accurately all transactions and asset dispositions in reasonable detail. All expenses must be recorded and classified appropriately and all asset accounts should be appropriately displayed on the Company's financial statements. The Company must also implement a system of internal controls to prevent and detect any activities that would be in violation of this policy. These controls must be monitored regularly to ensure they are operating effectively. These provisions apply to both domestic and foreign operations.

COMPLIANCE AND REPORTING VIOLATIONS:

Compliance with this policy is mandatory. If there is a question about proper treatment, employees should consult with the Company's legal department. Periodic audits will be conducted by internal and external resources to determine adherence. Annually, employees who interact with third parties will be required to participate in training and certify that they are in compliance with this policy. Violation of this policy may result in management review and further disciplinary action. Disciplinary action may include loss of access privileges, termination, and prosecution. All actions will be in accordance with established Human Resource policies.

To report perceived violations of the law or this policy, employees can use the Corporate Governance Hotline at the phone number and web address provided in *Whistle-Blower Policy*.

At the request of the reporting person, reports through the corporate governance hotline services will be kept confidential and anonymous, except as necessary to conduct, conclude, and, if appropriate, take legal action as a result of the investigation.

Any employee, executive officer, and member of the Board of Directors, who, in good faith, reports what he or she believes to be a violation of this policy will not be subject to any form of retaliation as a result of making such report.