

Trivero, May 5th, 2021

Ms. Beatriz Balbin
Chief, Special Procedures Branch
United Nations Commission on Human Rights

Object: your letter AL OTH/169/2021 dated 12 march 2021.

Dear Ms. Balbin, the Working Group, and the Special Rapporteurs:

I am writing in reply to your communication AL OTH 169/2021 dated 12 March 2021.

On behalf of Ermenegildo Zegna, I express our respect for your and your colleagues' efforts to ensure that human rights, as well as the fair and equal treatment of minority groups, are preserved globally.

Since its founding 110 years ago, Ermenegildo Zegna has been a private, family-owned company. Our founder worked to create a company that not only produced the highest-quality products, but also a brand built upon a deep respect for people and the environment. Core to who we are is a belief that a quality product can only come from an organization rooted in inclusion, integrity and well-being. Mr. Zegna's guiding principles continue to this day, even as we have grown into an international brand with a global presence.

Bedrock to who we are as a company is an uncompromisable commitment to upholding human rights throughout our own operations and supply chain. This principle is expressed in the Ermenegildo Zegna Code of Ethics, as well as in our Suppliers Code of Conduct, both of which are in line with global labor standards, the Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. Our Suppliers Code of Conduct specifically prohibits the use of forced labor, stating that "Suppliers will not use involuntary, forced or trafficked labor, will maintain employment strictly on a voluntary basis."

Suppliers who work with Zegna are required to agree to, sign and comply with our Supplier Code of Conduct. As stated in the Suppliers Code of Conduct, "In the event of any violation of this Suppliers Code of Conduct by the supplier or one of its suppliers or subcontractors, Ermenegildo Zegna reserves the right to review the business relationship and possibly terminate it in conformity with applicable law." Our Suppliers Code of Conduct is publicly available; I have attached a copy for your review.

To ensure compliance with our Suppliers Code of Conduct, we have a formal supplier audit and inspection process in place that allows us to monitor labor conditions across our full supply chain to ensure that our products are manufactured only in ways that live up to our standards. Specifically, our Suppliers Code of Conduct states:

[Zegna] reserve[s] the right to conduct periodically compliance audits at our suppliers and their own suppliers and subcontractors in order to verify the level of

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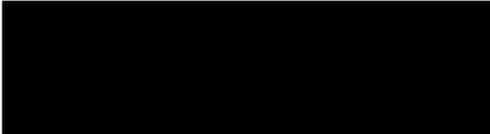
compliance [with] respect to this Suppliers Code of Conduct. During the audit activities the supplier must provide all information and data.

In February 2020, we became aware that a report by the Australian Strategic Policy Institute (ASPI) claimed that within Zegna's supply chain were Chinese factories that allegedly used forced labor. We have reviewed these claims regarding Zegna and confirmed that they are inaccurate; none of the companies listed in the ASPI report is a supplier to Zegna. Unfortunately, as Zegna was never contacted by ASPI regarding these claims, we were unable to correct the report before it was published. Despite the lack of any relationships with suppliers in this region, we decided to carry out a full internal investigation of our supply chain in China, which found that none of the companies named in the ASPI report dated February 28, 2020 are suppliers to Zegna, and that Zegna does not have any suppliers that are based in the Xinjiang Uyghur Autonomous Region of China.

Zegna has a limited number of external suppliers and has a largely vertically integrated business model that allows us to maintain significant control and oversight across our production chain. Zegna has received written statements from the small number of suppliers based in China that we do have, none of which are based in Xinjiang, assuring us of their compliance with our Suppliers Code of Conduct, as well as the principles and social standards established by international conventions.

I sincerely hope the above information addresses your concerns and makes clear that Zegna does not work with suppliers who profit from forced labor. We are deeply committed to continuing to ensure we meet the highest standards of responsible labor practices, and we stand at the ready to help our entire industry better address working conditions around the world.

With my sincere respect,



Alessandro Galletti
Internal Audit Director

Encl.: Suppliers Code of Conduct