

CODE OF ETHICS
Bulgari S.p.A.

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I Introduction

The Code of Ethics of Bulgari S.p.A., (hereafter referred to as the “Code of Ethics” or simply the “Code”), is a set of the general rules of conduct 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.

The Code of Ethics 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 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 conduct 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.

Bulgari S.p.A. will keep all the recipients of the Code of Ethics, 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 and the Board of Statutory Auditors of those companies (or the equivalent bodies if such exist) (hereafter referred to as the “Recipients”).

The Recipients are held to respect the Code of Ethics as an essential part of the obligations undertaken as the result of the relationship established with a Group 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 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 of Ethics 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.

By adopting conduct that is unexceptionable from an ethical standpoint, the legacy of trust, quality and seriousness that the Bulgari Group has accumulated over one hundred years of doing business may be maintained and increased.

IV Group values

Bulgari S.p.A. 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 BRANDS”).
- ✓ 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”).

V Business activities and the performance of duties

The manner in which the Recipients of this Code of Ethics 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.

Recipients must respect organisational and managerial rules to the full, within the limits of spending programmes and by the means approved by the competent corporate bodies and business functions, availing themselves of functionally competent business management for support when needed.

a) Presents, gifts and other articles of use

The manner in which the Recipients of this Code of Ethics 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 Bulgari S.p.A. or other Group companies.

As concerns the receipt of gifts, reference should be made to the prevailing policy issued by Bulgari S.p.A..

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.

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, he or she must immediately inform his or her superior and the head of the Internal Audit function in Bulgari S.p.A. of this, or alternatively advise the director delegated with supervisory responsibilities for the Code of Ethics for the subsidiaries of Bulgari S.p.A., who will inform the head of the Internal Audit function.

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) 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.

d) Management of information

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.

As part of confidential information, particular importance is attributed to information not in the public domain but which, if made public, could be used to affect in a significant manner the price of the financial instruments issued by Bulgari S.p.A. (so-called Price Sensitive information).

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.

In light of the above, no Recipient holding important information and/or information that is shortly to be released may, before publication and on the strength of such information, carry out purchase or sales transactions of Bulgari shares, either directly or indirectly.

Price sensitive information is communicated externally solely by authorised parties, in compliance with prevailing law and business policy as well as to ensure that information is provided broadly in the same manner and at the same time.

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.

VI 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.

b) Suppliers

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.

c) Relations with third party collaborators

The selection of third party collaborators must be based on merit, competence and professionalism. Furthermore, 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.

d) The Public Administration

Relations with the Public Administration must be established 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 Group companies in performing the institutional activities assigned to them.

Relations with the Public Administration 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 Administration by improper means, must not examine or propose commercial opportunities that might benefit employees of the Public Administration personally, must not solicit or obtain confidential information that could compromise the integrity of both parties or examine or propose job opportunities regarding employees of the Public Administration or their family members with the aim of influencing the decisions taken by the Public Administration 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 Administration, 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.

e) 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.

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.

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-for-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) Health and safety in the workplace

The companies of the Bulgari Group guarantee protection and safety in the workplace for their personnel and for third parties, undertaking to abide by prevailing laws and regulations and to promote and maintain, especially through preventative actions, good health, the protection of employees and the safeguarding of all workplaces.

VII Internal control system

The Board of Directors has the responsibility for the internal control system.. The Board of Directors establishes directives for internal control and for the management of business risks and on a periodic basis checks that is effectively working and adequate, 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.

The purpose of the internal control system is to ascertain the adequacy of business processes in terms of effectiveness, efficiency and economy and to ensure that financial information is reliable and correct, that business assets are safeguarded and that external and internal regulations are being complied with.

VIII 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 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:

- ✓ to respecting fundamental human rights;
- ✓ to preventing the exploitation of minors;
- ✓ to not using any form of forced labour or work carried out in conditions of slavery or servitude;
- ✓ to 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.

IX 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 the Ethical 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.

X 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.

XI Supervision, circulation and revision of the Code of Ethics

The Internal Control Committee has the task of supervising that the Code of Ethics is being perused and respected; the Committee may avail itself of the Internal Audit function. Any breaches of the Code must be brought to the attention of the head of the Bulgari S.p.A. Internal

Audit function, who will carry out the necessary checks and controls in connection with the information received.

With regards to the subsidiaries of Bulgari S.p.A., a director purposely delegated, has the task of supervising that the Code of Ethics is being applied and respected by the subsidiaries of Bulgari S.p.A.. Any breaches of the Code must be brought to the attention of the director delegated for the purpose and to the Human Resources function and must also be communicated to the head of the Internal Audit function of Bulgari S.p.A. on a timely basis.

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 head of the Internal Audit function, if necessary or opportune.

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 Human Resources function shall have the responsibility for taking decisions on the subject of breaches of this Code.

The Code of Ethics shall be brought to the attention of the Recipients by means of a suitable means of communication.

Any revision, amendment or addition to this Code of Ethics shall be approved by the Board of Directors of Bulgari S.p.A. and of the relevant company belonging to the Group

XII Effective date and coordination with business procedures

This Code of Ethics was approved by the Board of Directors of Bulgari S.p.A. on September 13rd, 2007 with immediate effect.

Bulgari S.p.A. is submitting the Code of Ethics to its subsidiaries and associates so that, once they have made any additions due to specific situations or particular matters, may adopt it formally as a management tool and as an effective component of business strategy and organisation. The effect of circulating the Code of Ethics throughout the Group is to make it applicable to all the subsidiaries of Bulgari S.p.A. and binding on the conduct of their employees, directors and collaborators and the members of their controlling bodies.

The Code of Ethics 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 of Ethics.

In order to protect its reputation and safeguard its resources, Bulgari S.p.A. and in general all the companies forming part of 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 Ethics.