MONCLER
GROUP

MONCLER GROUP ARTIFICIAL INTELLIGENCE APPROACH

Moncler has adopted an internal Artificial Intelligence ("AI") policy and a structured governance to ensure the responsible and ethical development, deployment, and lawful use of AI technologies across the Group.

The internal AI policy is periodically reviewed by the AI Governance Committee in accordance with Moncler's relevant procedures and is aligned with applicable laws, following evolving regulatory requirements, and best international practices. Any updates or revisions are promptly communicated to all relevant users through the publication of an updated version of the Policy.

This document provides an overview of Moncler's approach to AI, including the governance structure, key policy principles, and the main actions and initiatives implemented to support the management of AI-related risk and opportunities.

1. GOVERNANCE

Moncler Group (hereinafter, "**Moncler**") has established a dedicated governance framework to ensure effective oversight, accountability, and responsible management of Artificial Intelligence across the organization.

At Board level, oversight of AI-related matters is entrusted to the **Control, Risks and Sustainability Committee**, a Board Committee composed of members of the Board of Directors. The Committee receives updates on AI developments, initiatives, risks, and opportunities from the **Chief Information & Technology Transformation Officer** and the **Data & AI Director**.

To support the operational implementation and governance of AI, Moncler has established a cross-functional **AI Governance Committee**, composed of representatives from the key functions involved in the development, deployment, management, and oversight of AI systems. The Committee is responsible for reviewing AI initiatives, monitoring compliance with internal and external requirements, assessing potential risks and impacts, and promoting the consistent application of the Group's AI principles across the organization.

In addition, each AI initiative is assigned to a designated **AI Project Owner**, typically the Business Manager responsible for the initiative, who is accountable for the project's implementation and serves as the primary point of contact for relevant stakeholders throughout the AI lifecycle.

Through this governance structure, Moncler has established clear roles, responsibilities, and decision-making processes for all parties involved in the development, deployment, and use of AI systems. The framework aims at ensuring appropriate oversight and the allocation of risk management responsibilities across the organization.

To support the consistent and responsible adoption of AI, Moncler has developed internal policy operational processes, and training materials that provide employees with the necessary principles, requirements, and tools to manage AI-related opportunities and risks.

2. MAIN PRINCIPLES

Moncler's AI governance framework is grounded in core principles set out in the internal AI policy, that guide the design, development, deployment, and use of AI systems across their entire lifecycle.

Human oversight

AI systems should be designed and developed in such a way that they can be effectively overseen by humans and appropriate human-machine interface tools should be in place to facilitate this.

The level of human oversight required will depend on factors such as the degree of autonomy the AI system has, and indeed some system may require more human oversight than others. The type and degree of impact the AI system has on the individual, or society will also play a part. An example of human oversight would be quality checking the output of a generative AI program to ensure its accuracy and appropriateness.

Human oversight measures must be put in place before any AI system is put on to the market or put into service. This might include providing instructions to Moncler Group employees about how to safely supervise any AI systems in our services, or following the measures set out by the provider prior to deploying the AI system, where an AI system has been licensed or purchased from a third party.

Technical Robustness and Safety

Moncler prioritizes user trust, safety, and compliance in the design and operation of AI systems. AI systems are developed and operated to ensure technical robustness, security, and reliability throughout their lifecycle.

In line with applicable regulations, including the EU AI Act, Moncler does not deploy or use AI systems that involve prohibited practices, such as manipulative or deceptive techniques intended to materially distort human behaviour, exploitation of individuals' vulnerabilities, social scoring or categorisation based on personal characteristics, or unauthorized real-time remote biometric identification or surveillance.

AI systems are designed with the intention of mitigating risks of harm and unintended outcomes through appropriate safeguards, taking into account technological developments, including transparency regarding system limitations, user guidance on potential risks, and timely corrective actions where issues arise. Relevant international technical standards are considered where appropriate, and accessibility requirements are integrated into system design.

AI initiatives identified as potentially falling within prohibited or high-risk categories are subject to escalation and review and are suspended or redesigned where necessary to ensure compliance with applicable legal and internal requirements.

AI systems are designed and operated within defined boundaries of intended use. These boundaries are translated into clear internal guidelines and acceptable use principles, which are communicated to employees to define the scope within which AI tools can be appropriately used. This ensures that users understand both the capabilities and limitations of AI systems. Any usage of AI systems other than those made available or expressly approved by Moncler for work-related activities is strictly prohibited.

Data Governance, Privacy and Cybersecurity

Moncler ensures that AI systems are built on high-quality, relevant, representative, and appropriately sourced data. Key commitments include ongoing effort to:

- Integration of **privacy** by design and by default principles throughout AI system development;
- Involvement of the **Data Protection Officer** in AI projects where appropriate and/or required;
- Minimization of **personal data** use and reliance on appropriate lawful bases for processing;
- Implementation of **technical security measures**
- Application of enhanced **cybersecurity safeguards** for AI systems processing sensitive data, proportionate to the level of risk involved;
- Ensuring that personal data used by AI systems is collected, processed, and stored lawfully and in full compliance with applicable **data protection legislation**.

Transparency and Explainability

Moncler should ensure that it is **transparent** with those impacted by the interaction with an AI system about the fact that it is using AI, and what that means for them. Individuals may have further rights they can exercise in relation to AI but need to first understand how and in what ways Moncler is using AI in its dealings with them. Some AI systems, such as chatbots, can seem human in their responses and outputs. Users should be informed when they interact with such a system. Where an AI system is the primary interface with the user, Moncler needs to ensure that the AI system identifies itself as a non-human. Furthermore, where personal data is being used by the AI system, Moncler will ensure that its privacy notices reflect this and that it continues to obtain the relevant consent or other relevant lawful basis.

In addition, Moncler also needs to ensure that AI systems are '**explainable**' – meaning that Moncler can explain how its AI systems arrive at their conclusions; what data they use; and the level of trust that can be placed on the results. If Moncler is procuring AI systems from third parties, those third-party may need to provide Moncler with some or all of this information.

Fairness and Non-Discrimination

Diversity, non-discrimination, and fairness are fundamental values. Moncler should ensure that its AI systems are inclusive, accessible, and developed with a commitment to promoting equality in all its forms, including gender equality and cultural diversity.

Moncler is committed to ensuring that its **AI systems promote equal access**. This means Moncler should work to make its technologies available to all individuals, regardless of their demographic characteristics, geographical location, socioeconomic status, or other distinguishing factors.

As an integral part of Moncler's commitment to fairness, by requiring third-party AI providers to implement appropriate measures to prevent, identify, monitor and remediate bias in their ai systems, Moncler actively strives to **avoid any form of discrimination or bias** in its AI systems. Moncler recognises that AI systems can unintentionally perpetuate and amplify existing biases if they're trained on biased data, leading to discriminatory outcomes (e.g. AI sizing recommendations must not systematically favor certain demographics. If a system consistently suggests smaller sizes to specific ethnic groups due to biased training data, this constitutes discrimination requiring immediate correction).

Environmental Criteria

Moncler is aware of the environmental footprint associated with AI systems and is committed to further exploring this aspect in the future, also in light of the rapid technological developments underway, with the aim of assessing potential efficient infrastructure solutions.

Accountability

Moncler can expect to be held accountable for its development and use of AI. For this purpose, the Group has developed appropriate policies, guidelines, processes and training materials to ensure that the business understands, and remains accountable for, the risks associated with AI development and use.

3. TRAINING

Moncler recognizes that employee awareness and competence are essential for the responsible and effective use of AI technologies. The Group is committed to providing adequate training to users to ensure the safe and responsible operation of AI systems, with training programmes tailored to specific roles, responsibilities, and levels of interaction with AI technologies.

4. AI CURRENT PROGRAMS

In line with the Group's AI governance framework and responsible AI principles, Moncler is progressively developing and implementing a set of structured programs and operational measures

across key areas, with the aim of ensuring the safe, ethical, and compliant use of artificial intelligence across the organization. In particular:

- Moncler has adopted a procedure (mentioned above) that authorizes the use of specific AI tools, while prohibiting the unrestricted use of third-party platforms that have not been previously reviewed and validated by the AI Committee. This approach is intended to mitigate the risk of misuse or abuse by providing clear guidelines on who is authorized to deploy these technologies.
- Moncler has also implemented dedicated training programs to support the responsible use of AI across the organisation. In particular, initiatives such as the Microsoft 365 Copilot adoption programme and the Leonardo AI training programme provide employees with guidance on the ethical use of AI tools, data protection principles, and security best practices. These programmes cover topics including bias awareness, data privacy, responsible use of AI-generated outputs, and cybersecurity considerations, with the aim of strengthening employees' awareness and ensuring the safe and responsible use of AI technologies.
- Moncler has always been committed to adopting a transparent approach. In the case of fully AI-generated content, it uses appropriate labelling, such as for the Moncler FW26 Footwear campaign.