

EXPORTS TO RUSSIA POLICY

1. Purpose and Scope

This Policy sets out Gessi S.p.A.'s ("**Gessi**") requirements concerning compliance with European Union restrictive measures and export controls relating to the Russian Federation ("**Russia**"), including restrictions concerning the direct or indirect supply of products to Russia or for use in Russia, designated persons and entities, specified territories of Ukraine and the prevention of sanctions circumvention. This Policy applies to all distributors of **Gessi** products (the "**Distributors**").

2. Applicable Regulations

The European Union has adopted extensive restrictive measures in connection with Russia's actions against Ukraine. The applicable legal framework includes, in particular, Council Regulation (EU) No 833/2014, Council Regulation (EU) No 269/2014 and Council Regulation (EU) 2022/263, in each case as amended from time to time, together with any other applicable EU restrictive measures and export-control legislation.

Such restrictive measures include, among others, restrictions concerning:

- the sale, supply, transfer or export of certain goods and technologies to Russia or for use in Russia;
- dual-use goods and technologies and other goods capable of contributing to Russia's military or technological enhancement;
- certain luxury and industrial goods;
- transactions involving designated persons or entities, entities owned or controlled by them, and other persons or entities subject to applicable asset-freeze or transaction restrictions;
- trade involving the non-government-controlled areas of Ukraine in the oblasts of Donetsk, Luhansk, Zaporizhzhia and Kherson; and
- conduct intended to circumvent, or having the effect of circumventing, applicable restrictive measures.

3. Compliance

Gessi is committed to full compliance with all applicable sanctions, restrictive measures and export-control laws.

In view of the complexity and evolving nature of the applicable sanctions framework, and irrespective of whether a particular Gessi product is itself subject to a product-specific prohibition under applicable law, Gessi has adopted, as a matter of internal compliance policy, a general prohibition on the direct or indirect sale, supply, transfer, export or re-export of Gessi products to Russia or for use in Russia, unless expressly authorised in writing by Gessi following an appropriate sanctions review.

Distributors must also refrain from any transaction involving a person, entity, destination or end-use where the transaction would breach applicable sanctions or export-control laws.

4. Distributor Obligations

4.1. In this context, Distributors must not, directly or indirectly, sell, supply, transfer, export or re-export any Gessi product:

- (a) to Russia or for use in Russia;
- (b) to or for the benefit of any person or entity where the transaction is prohibited under applicable sanctions;
- (c) to any destination or end-user where the Distributor knows or has reasonable grounds to suspect that the product will subsequently be transferred, exported or re-exported to Russia or for use in Russia; or
- (d) in any manner intended to circumvent or facilitate the circumvention of applicable sanctions or this Policy.

EXPORTS TO RUSSIA POLICY

4.2. Distributors must maintain appropriate risk-based procedures to ensure compliance with this Policy. In particular, where appropriate having regard to the circumstances of the transaction, Distributors must verify:

- (a) the identity of the customer and relevant beneficial owners or controlling persons;
- (b) the destination of the Gessi products;
- (c) the identity of the end-user and the intended end-use of the products; and
- (b) any circumstances or red flags indicating a risk of diversion, re-export or circumvention.

4.3. If a Distributor knows or has reasonable grounds to suspect that a proposed transaction may breach or circumvent applicable sanctions or this Policy, the Distributor must suspend the transaction and promptly notify Gessi. The transaction must not proceed unless and until the relevant concern has been resolved and, where required by Gessi, written clearance has been provided.

4.4. Distributors must take appropriate measures to prevent the onward sale, transfer, export or re-export of Gessi products to Russia or for use in Russia. Where reasonably required by the nature of the transaction or the sanctions risk involved, Distributors must impose equivalent restrictions on their customers and other downstream counterparties.

4.5. Distributors must maintain appropriate records evidencing compliance with this Policy and, upon reasonable request, provide Gessi with information and documentation reasonably necessary to verify compliance or investigate a suspected breach, subject to applicable law.

4.6. Distributors must promptly inform Gessi of:

- (a) any request or inquiry concerning the direct or indirect supply of Gessi products to Russia or for use in Russia;
- (b) any suspected attempt to circumvent this Policy or applicable sanctions;
- (c) any actual or suspected diversion or unauthorised re-export of Gessi products; and
- (d) any actual or suspected breach of this Policy or applicable sanctions relating to Gessi products.

5. Consequences of Non-Compliance

Failure to comply with this Policy may result in Gessi suspending or refusing orders or deliveries and, where permitted under the relevant contractual arrangements and/or applicable law, exercising any other available contractual or legal remedies, including termination of the relevant distribution relationship.

Nothing in this Policy limits any obligation of a Distributor to comply independently with applicable sanctions, export-control or other applicable laws.

6. Contact

Any questions, notifications or requests for clearance under this Policy must be addressed to Gessi's Legal Department.

Gessi may amend this Policy from time to time to reflect changes in applicable law, regulatory guidance or Gessi's compliance requirements. Distributors are required to comply with the version of this Policy communicated to them by Gessi, including by publishing on its website, from time to time.

Updated as of 08/2026