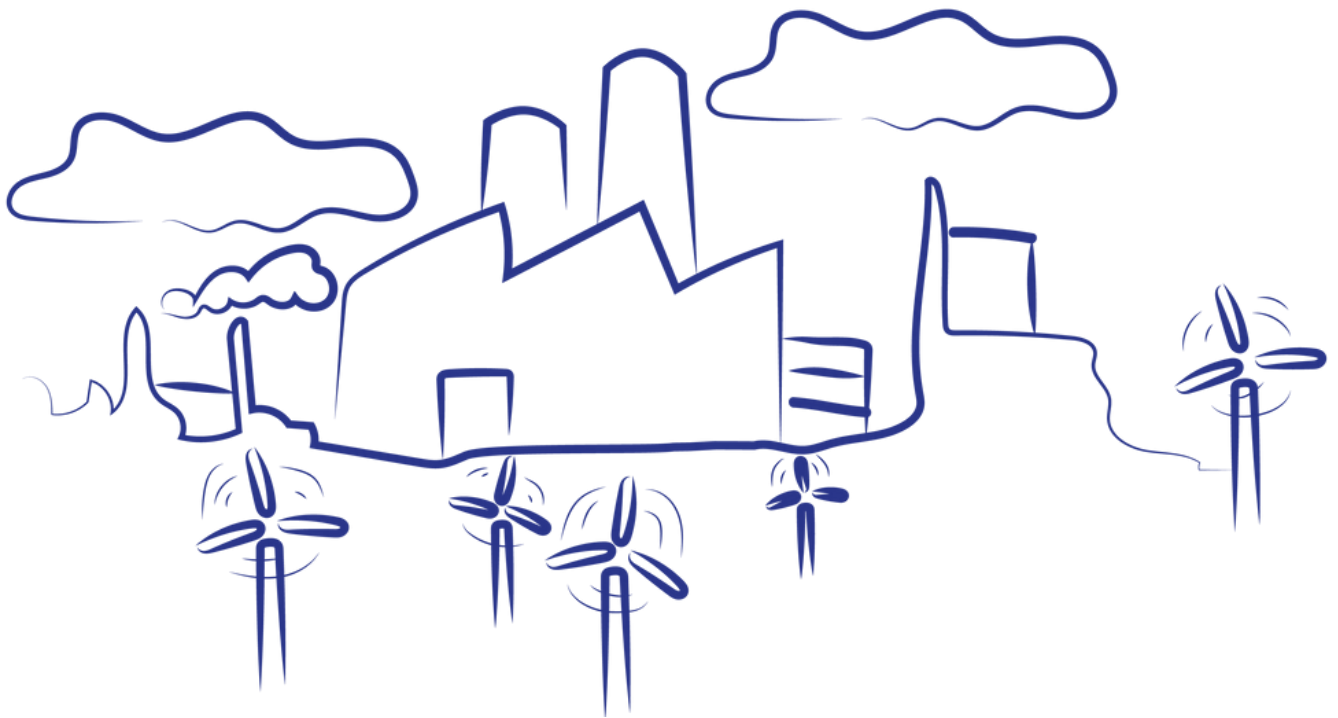


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NEWSLETTER // **Fashion & Luxury**



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The compliance certification for the fashion industry's supply chains

The proposal of draft law 1484/2025 to promote sustainable growth in the fashion industry, prevent violations of labor protection regulations, and ensure full traceability of the supply chain

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1. Introduction

On May 12, 2025, the Italian Minister of Enterprises and *Made in Italy*, in agreement with the Italian Minister of Labor and Social Policies, presented the annual draft law on small and medium-sized enterprises no. 1484 (hereinafter “**draft law 1484/2025**”) in order to implement European provisions on the protection and development of micro, small, and medium-sized enterprises.

Subsequently, in August 2025, the Italian Minister of Enterprise and *Made in Italy* proposed a package of amendments to draft law 1484/2025, with the aim of introducing significant changes for the fashion sector. More specifically, some of the amendments (referred to in the new Articles 19 *bis*) provide for the establishment of a so-called “Single compliance certification for the fashion industry’s supply chains” (hereinafter “**Single compliance certification**”) characterized by a strict network of rules and controls designed to protect both the image and products of the most virtuous companies in the sector.

If adopted, the Single compliance certification will represent a “guarantee tool” for the quality of **(i)** brands, **(ii)** products, and **(iii)** internal strategies and procedures, especially in terms of supply chain traceability, labor protection, and corporate sustainability, in line with the provisions of the Italian “*Camera Nazionale della Moda*” (CNMI – the National Chamber for fashion industries).

2. Scope of the provision

If approved, the Single compliance certification will apply to the so-called “**fashion supply chains**”, defined by draft law 1484/2025 as the lead companies and supply chain companies that are «*linked by contractual and sub contractual relationships aimed at the creation of products or services in the fashion sector, including the design, sampling, production, and processing of textiles, clothing, leather goods, and footwear, including the related accessories*».

The “**lead company**” is «*the company heading a fashion supply chain, including any potential licensee of the brand, with its registered office and/or one or more production sites in the territory of the Italian Republic, which commissions supply chain companies to provide for*» **(i)** finished products intended for sale, **(ii)** processing of finished products intended for sale or intermediate processing, and **(iii)** sample products for the creation of collections.

Draft law 1484/2025 then defines the “**supply chain company**” as a business structure that meets all the following requirements:

1. has its registered office or a production unit in the territory of the Italian Republic;
2. participates – under a contract, subcontract, supply agreement, subcontracting agreement, or service agreement with a lead company – in the production and processing of goods and products in the textile, clothing, footwear, and leather goods sectors, excluding **(a)** the processing and supply of raw materials (including fabrics, leather, and yarns) and **(b)** the processing and supply of catalog accessories without customization components.

Finally, the “**supply chain subcontractor**” is mentioned, as the company that meets the same requirements as the supply chain company and is linked to the latter by a subcontracting agreement.

3. Certification requirements

The fashion supply chain can only obtain the Single compliance certification if both the lead company and the supply chain companies meet certain requirements established by draft law 1484/2025 and including:

- the absence (in the last five years) of criminal convictions, even if not final, of the owners or directors of the companies «*for violations of labor and social legislation, for crimes against the public administration, against public safety, against public economy, industry and commerce, and in relation to income and value added taxes, as well as for the crimes referred to under Articles 600, 601, 602, and 603 bis (1) of the Italian Criminal Code*»;

(1) These are crimes relating to enslavement or servitude, human trafficking, the purchase and sale of slaves, illegal brokering, and labor exploitation.

- the non-application (in the last three years) to the lead company or companies in the supply chain «*of administrative fines for violations of labor and social legislation totaling more than 4 percent of annual turnover*»;
- the regularity of contributions, social security and insurance premiums of both the lead company and the supply chain companies.

The Single compliance certification will be valid for one year and may only be issued by entities authorized to perform statutory audits pursuant to Article 2 of legislative decree 39/2010. Said authorized entities, defined by draft law 1484/2025 as “**certifying entities**”, must verify that the above requirements are met, carrying out, where necessary, access, inspections, and audits at production sites. The certifying entities will then be required to decide on the Single compliance certification application within sixty days of its submission. The deadline may be suspended only once and for no more than thirty days, in order to obtain any information missing from the application.

In this regard, the Ministry of Enterprise and *Made in Italy* will be required to establish a register listing all the Single compliance certifications issued. All specific instructions and provisions relating to the application, issuance, verification, monitoring, maintenance of requirements, and revocation of the Single compliance certification will be dictated, if draft law 1484/2025 is approved, by a specific decree of the Minister of Enterprise and *Made in Italy*, in agreement with the Ministers of Labor and Social Policies, the Interior, and Economy and Finance. In addition, through the adoption of collective agreements, trade associations will be able to define the methods by which lead companies will contribute to the costs incurred by supply chain companies to obtain and maintain the Single compliance certification.

4. The obligations of lead companies and supply chain companies

Maintaining the requirements for the Single compliance certification will be accompanied by specific obligations for both lead companies and supply chain companies. In particular:

- lead companies that purchase goods or services from suppliers that are part of the fashion supply chain must **(a)** maintain and update at least every six months a register of their suppliers, **(b)** adopt the guidelines on the qualification and accreditation, selection, evaluation, and monitoring of supply chain suppliers defined by the most representative trade associations at the national level and approved by the Ministry of Enterprise and *Made in Italy*, **(c)** include in contracts with supply chain companies specific commitments on their part to ensure compliance (including by supply chain subcontractors) with labor, tax, social security, and occupational health and safety regulations, **(d)** acquire, upon signing the first contract with the supply chain company, updated documentation relating to its registration in the register of companies, the Chamber of Commerce

certificate, self-certification of possession of the technical and professional requirements referred to in Article 26, paragraph 1, letter a), number 2, of legislative decree 81/2008 (Italian Consolidated Law on Health and Safety or **TUSS**), the Italian single document of contribution regularity (**DURC**), the Italian single document of tax regularity (**DURF**), and any additional documentation useful for verifying compliance with the obligations referred to in letter c, **(e)** request that suppliers of the fashion supply chain update the documentation referred to in letter d at the relevant legal deadlines or, in absence of formal deadlines, every two years;

- lead companies must adopt an organizational, management, and control model (**OMCM**) pursuant to Articles 6 and 7 of legislative decree 231/2001, suitable for preventing crimes relating to illegal intermediation and labor exploitation, money laundering, and the use of money, goods, or benefits of illegal origin.
- supply chain companies shall instead comply with a series of minimum contractual safeguards for their subcontractors, including **(a)** the conclusion of a subcontracting or procurement contract containing all the essential elements of the supply, **(b)** the precise indication of the essential contractual obligations, with express provision for the termination of the contract in the event of non-compliance, **(c)** the provision of corrective measures in case of omissions, delays, or inaccuracies in the performance of the services, aimed at restoring the conditions of legality, and **(d)** «*the obligation to include in the contracts referred to in point (a) a clause requiring the application of the relevant national and regional collective agreements for the fashion industry and crafts sector, signed by the most representative trade unions at national level, without prejudice to the applicability of company-level trade union agreements that provide for treatment, including economic treatment, that is not overall detrimental, even in relation to subcontractors that entrust the processing of the main client's products, in whole or in part, to third parties*».

The main advantage of the Single compliance certification will be the ability to use the wording “**Certified Fashion Supply Chain**” in promotional activities. Anyone who has not obtained the Single compliance certification will be prohibited from using the wording, to avoid any confusion among consumers. Misuse of the wording may therefore be punished with an administrative fine between euros 10.000 and euros 50.000, imposed by the Italian “*Autorità garante per la concorrenza e il mercato*”.

5. “Special” corrective measures

Finally, draft law 1484/2025 provides for the applicability of certain special provisions for supply chain companies and lead companies that have obtained the Single compliance certification. Indeed, before applying the measure referred to in Article 34 of legislative decree 159/2011 (i.e., judicial administration), the competent court will grant the supply chain company, even if it is the lead company, a period of not less than sixty days to adopt the corrective measures identified by the court itself. The judicial administration measure will therefore only be applied if the corrective measures are not adopted within the deadline set.

Furthermore, if the request for the application of the measure concerns the lead company on the basis of the existence of «economic and contractual links with companies in the supply chain administered by or attributable to persons against whom one of the personal or asset prevention measures [referred to in Articles] 6 and 24 of legislative decree no. 159 of September 6, 2011, or persons subject to criminal proceedings for any of the crimes referred to in Article 34, paragraph 1, of the aforementioned legislative decree» judicial administration will not be applied in the event of termination of contractual relations with the supply chain companies that are concerned.



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