

Burberry Anti-Bribery and Anti-Corruption Policy

Last updated: 11 November 2024

BURBERRY

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POLICY OBJECTIVES

The UK Bribery Act (the “**Act**”) is intended to support international efforts to combat bribery, corruption and facilitation payments in accordance with the United Nations Convention against Corruption. The Act applies to all UK companies wherever they operate in the world. This includes Burberry and extends to any individual, entity, business, company, partnership or any other body or group associated with Burberry including, without limitation, any such individual, entity, business, company, partnership or any other body or group supplying products, goods, raw materials, components, services, real estate or anything else, directly or indirectly, to any member of the Burberry Group or otherwise working directly or indirectly with or on behalf of any member of the Burberry Group. This also includes any person (an “Indirect Supplier”) providing products, goods, raw materials, components, services or anything else to (i) a direct supplier of Burberry or any other member of the Burberry Group or (ii) any other Indirect Supplier (“**Business Associates**”).

Burberry Associates include, without limitation, the following:

- finished goods vendors
- raw material and/or component suppliers
- people or entities who carry out any processing on any goods directly or indirectly supplied to Burberry, including sites at which processing takes place
- non-stock vendors
- construction contractors (and their construction sites)
- franchisees
- licensees
- joint-venture partners
- consultants
- contractors
- wholesale customers
- service providers, including circular business model service platforms
- agents
- landlords, and
- any subcontractor of the above

Failure to comply with the Act could expose Burberry, its employees and its Business Associates to the risk of criminal prosecution, fines as well as severe reputational damage.

Burberry does not tolerate bribery or corruption of any form. It is committed in all of its dealings to act ethically, legally and with independence and integrity. Doing so is core to the brand, Burberry’s reputation and its business strategy. Accordingly, Burberry has adopted an Anti-Bribery and Anti-Corruption Policy (“**Policy**”) which sets out Burberry’s position on bribery, corruption and facilitation payments. This Policy applies globally to all Burberry employees, contractors and Business Associates.

This Policy is made available to Burberry employees, contractors and Business Associates at all times on Burberry Group Plc's [website](#). This Policy is also shared with new Business Associates as part of the onboarding process and forms part of the mandatory compliance obligations that Business Associates contractually agree to when doing business with Burberry. Additionally, Burberry employees have mandatory annual anti-bribery and anti-corruption training which covers the content of this Policy.

Burberry employees, contractors and Business Associates are expected to comply with this Policy and to conduct themselves in accordance with the highest ethical standards at all times. This includes not engaging in any activity (either directly or indirectly) which is, or could be perceived to be, corrupt, improper or unlawful. Burberry employees, contractors and Business Associates are asked to familiarise themselves with the terms of this Policy as set out below.

Burberry is committed to investigating all reports of bribery, corruption or other breaches of this Policy promptly, thoroughly, independently¹ and objectively. Burberry employees, contractors and Business Associates shall immediately report any suspected acts of bribery, corruption or other breach of this Policy, or any other legitimate concerns about unlawful behaviour related to bribery or corruption, to Burberry's General Counsel, who is responsible for implementing this Policy.

Burberry employees and contractors should raise concerns to their line manager, Asset & Profit Protection or Human Resources, or, if the individual feels more comfortable, through Burberry Confidential. Business Associates can also use Burberry Confidential.

Burberry has an open culture with high standards of accountability and ethical behaviour and is committed to encouraging and protecting those who speak up. Burberry has zero-tolerance for retaliation against those who raise concerns. Reports of suspected bribery, corruption or breaches of this Policy will be handled in accordance with the Burberry Confidential and Whistleblowing Policy.

Where a breach of this Policy occurs due the actions or omissions of a Business Associate or any of its third parties, Burberry will be entitled to terminate the business relationship with the Business Associate concerned and to take any other actions it may deem appropriate.

Burberry reserves the right to update this Policy from time to time as may be required to safeguard the reputation and integrity of the Burberry brand and to ensure continued compliance with anti-bribery and anti-corruption laws.

¹ Independently means that the investigation must be carried out (i) by an employee from a different department who holds a more senior position than the individual(s) under investigation (or, in exceptional circumstances, is of equivalent seniority or the General Counsel) and has no personal or professional conflict of interest, or (ii) by a qualified external party (if deemed appropriate).

1. WHAT ARE BRIBERY, CORRUPTION AND FACILITATION PAYMENTS UNDER THE BRIBERY ACT?

Bribery occurs when a payment, gift or favour is offered, paid, sought or accepted to influence a business outcome inappropriately.

Corruption is behaviour lacking in honesty and integrity and particularly relates to the giving of bribes to anyone in return for corporate or personal gain.

Facilitation Payments are payments, irrespective of size, made to governmental officials to speed up legal or administrative processes.

Bribery, corruption and facilitation payments are unethical, illegal and against this Policy. Companies and individuals can be prosecuted by regulators for engaging in these activities.

2. YOUR OBLIGATIONS AS AN EMPLOYEE, CONTRACTOR OR BUSINESS ASSOCIATE

Burberry may be held responsible if its employees, contractors or Business Associates pay bribes to obtain or retain business or some other benefit for Burberry. This is regardless of whether Burberry was aware of this activity and regardless of where in the world this activity takes place. Accordingly, all dealings by Burberry employees, contractors or Business Associates including between Business Associates and other third parties must be conducted in accordance with this Policy.

Burberry employees and contractors must complete the onboarding and ongoing annual anti-bribery and anti-corruption training modules to ensure they understand their obligations and responsibilities in respect of this Policy. Certain employees and contractors may have additional targeted training depending on their function. Business Associates must regularly familiarise themselves with this Policy.

Prohibited Activities

Bribery and corruption laws apply to everyday situations which Burberry employees, contractors or Business Associates may encounter. For example, expediting a visa application or customs clearance or inviting a government employee to a hospitality event.

Specifically, Burberry employees, contractors and Business Associates must not (either directly or indirectly) engage in any of the following.

- In any way be involved in the giving or receiving of a bribe, regardless of any local custom or practice and regardless of the size of the bribe.
- Bribe another person intending to obtain or retain a business or other advantage for Burberry or the Business Associate in connection with its work for Burberry.

- Offer, promise or give a financial or other advantage to anybody intending that he/she does something improperly for the benefit of Burberry or the Business Associate in connection with its work for Burberry. Request or any accept benefit from anyone on a scale that might be seen to create an unreasonable obligation to that party, or which would create a conflict of interest for Burberry or the Business Associate in connection with its work for Burberry.

All Burberry functions and Business Associates could be at risk in respect of bribery and corruption and must comply with this Policy, but the following functions are subject to higher risk and must remain vigilant: Trade Compliance, Supply Chain, Marketing and Procurement. Certain regions can also be at higher risk of bribery and corruption due to local customs and geopolitical circumstances.

Engaging Third Parties To Carry Out Burberry Business

As the Act extends to activities between Business Associates and other third parties, Business Associates should take care when choosing which third parties to undertake any business dealings in connection with Burberry (“Indirect Business Associates”). This should include the following.

- A thorough risk assessment should be carried out in respect of each Indirect Business Associate which is appropriate for the type of work being carried out and the relevant geographic region.
- Any compensation paid to or received by Burberry or the Business Associate from such Indirect Business Associate must be appropriate and justifiable remuneration for the legitimate service rendered. Any unusual charges that could conceal improper benefits must be queried by the Business Associate.
- A written agreement should be in place with the Indirect Business Associate including written acceptance of their understanding of this Policy and agreement to comply with its terms. They should be reminded of this obligation on an annual basis.
- Special care should be taken where Indirect Business Associates have relationships with government officials or persons known or reputed to have a close relationship with officials or other persons in positions of power in a country. Any engagement of an Indirect Business Associate who may have contacts with foreign officials must be approved in advance by Burberry.

3. GIFTS AND HOSPITALITY

Burberry employees, contractors and Business Associates are discouraged from giving or receiving gifts or hospitality with any parties with whom they have a business relationship or intend to do business. However, Burberry recognises that in the luxury business there are occasions when exchanging gifts or hospitality may be appropriate. For example, gifts and hospitality may be appropriate in connection with marketing and public relations activities or to acknowledge an event. In such circumstances, Burberry employees, contractors and Business Associates must be

guided by the highest ethical standards when deciding whether giving or receiving gifts or hospitality is appropriate.

In particular, Burberry employees, contractors and Business Associates must always ensure that any such exchanges are transparent, proportionate, reasonable and bona fide. **If the Burberry employee, contractor or Business Associate answers ‘yes’ to any of the following self-approval questions then the exchanging of gifts or hospitality in the circumstances is probably inappropriate.**

- Is the intention in any way to influence the recipient’s objectivity in making a business decision?
- Is the gift or entertainment lavish and/or disproportionate for the nature of the relationship and/or frequent?
- Could it place the Burberry employee, contractor or Business Associate, or another party, under an obligation, or would it feel under an obligation?
- Is the gift or entertainment unlawful in the Burberry employee, contractor or Business Associate’s country and/or the other party’s country?
- Is it reasonable to expect that the gift or entertainment is non-compliant with the policies of the other party’s organisation?
- Would the Burberry employee, contractor or Business Associate be embarrassed if Burberry or anyone else was aware of it?
- Would the Burberry employee, contractor or Business Associate be uncomfortable giving this gift or providing hospitality of this nature?

Gifts and Hospitality that are never acceptable

Some gifts and hospitality are never acceptable under any circumstances. Burberry employees, contractors or Business Associates, (including their employees, contractors and family members or others connected to them) must never give or receive gifts or hospitality that:

- are illegal;
- involve parties engaged in tenders or competitive bids;
- involve officials, such as governmental officials, foreign officials or those working for public international organisations;
- involve Burberry products offered by a vendor;
- are cash or cash equivalent;
- are ‘quid pro quo’ i.e. offered for something in return;
- are indecent, sexually oriented, incompatible with Burberry’s values or policies, or might adversely affect Burberry’s reputation;
- are paid for personally to avoid approval or disclosure or to withhold or conceal information; or
- are gifts offered to any Burberry employee within any financial year that are valued in excess of £250 (or the local currency equivalent amount).