

Code of Conduct
2024/2025

BURBERRY

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Foreword



Burberry is an extraordinary luxury brand, powered by exceptional people.

Born from innovation, our pioneering spirit and rich British heritage are woven into the fabric of our organisation. From protecting people from the weather, to unlocking opportunities for our communities, we uphold the principles of our founder Thomas Burberry today.

As an open, caring and inclusive employer, we foster a positive culture and environment where our people can grow and succeed. We also hold ourselves and each other to the highest standards of behaviour.

Our Code of Conduct guides our actions. It supports our people and partners to make informed, ethical and sustainable decisions, and outlines the key policies and processes we expect everyone working for or with Burberry to adhere to. This includes local laws and regulations, as well as our commitment to our planet, our communities, and each other.

It is this enduring commitment to responsible business that drives us forward and supports the long-term success of our people and Company.

Joshua Schulman
Chief Executive Officer



Our Purpose and Values

Our purpose statement Creativity Opens Spaces articulates the core belief that has guided Burberry since it was founded in 1856: that through imagination, innovation and ingenuity, we can push boundaries and open new opportunities for ourselves, our customers and our communities.

Creativity fuels Burberry and our shared conviction in its power is central to how we operate as a company.

Whether we are outfitting polar explorers, inspiring customers through digital innovation, supporting our communities or protecting our planet, we make space for creativity to thrive.

Our purpose is supported by four values which are intrinsic to Burberry and express who we are when we are at our best.

1

Creatively Driven

- Inspires passion and role-models creative thinking and sustainable practice.
- Challenges, collaborates and encourages excellence for Burberry, our customers and our communities.

2

Open and Caring

- Takes ownership for a culture of inclusion, sustainability and integrity.
- Prioritises development, cultivates morale and safeguards well-being so all colleagues can bring their authentic selves to work.

3

Proud of Our Heritage

- Celebrates and nurtures brand connection and pride, bringing our purpose to life.
- Acts in the best interests of the brand, the environment and our communities.

4

Forward Thinking

- Creates space for innovation, to take risks and push boundaries.
- Drives decisions and manages workload.
- Celebrates successes and learns from mistakes.



Our Code of Conduct

Our Code outlines the key policies, processes and behaviours that we have put in place to protect not only our business and brand, but also our people, our planet and our communities.

About Our Code of Conduct

Why We Have a Code of Conduct

Our Code of Conduct serves as a daily guide for how our colleagues and partners must behave and interact with one another at all times. It outlines the key policies, processes and behaviours that must be adhered to while following all local laws and regulations, and enables our people to make informed, ethical and sustainable decisions. By adhering to our Code, we ensure that we are acting in accordance with our values and are doing well by doing right by our stakeholders.

Who the Code Applies to

Adherence to our Code, including the policies and processes outlined in our Code, is a condition of working at or with Burberry, whoever and wherever you are. It applies to all permanent and temporary colleagues as well as to contractors. Third parties working with Burberry, such as joint venture partners and suppliers, should also adhere to the behaviours, policies and processes outlined in our Code.

How to Use Our Code

Our Code covers four areas: our business, our people, our planet and our communities. Each section includes links to information, policies and processes that help us to fully live our values, make the best choices and act in accordance with our Company standards.

Where our Code does not cover a specific topic, we expect our colleagues and partners to exercise sound commercial and ethical judgement and to contact their Burberry line managers and business partners with questions or concerns.

While some policies are directly linked in our Code of Conduct, others are for the reference of Burberry colleagues only and are accessible via our internal [Burberry World](#) portal.

Understanding Misconduct

If a colleague or person engaged by Burberry becomes aware that an individual is not following our Code, including the intended spirit of its contents, they should speak up and report that individual to their line manager or HR representative. They can also visit Burberry Confidential, our global confidential helpline – see the following page for further information.

Failure to adhere to our Code may lead to disciplinary action (which could result in dismissal for misconduct or gross misconduct) in the case of colleagues or the termination of contracts in the case of third parties. The standards set out in our Code are not optional, and compliance with our Code is additional to any legal or regulatory requirements.

ALL COLLEAGUES MUST COMPLETE OUR CODE OF CONDUCT TRAINING MODULES ON AN ANNUAL BASIS.

FOR FURTHER INFORMATION ON HOW TO USE OUR CODE, COLLEAGUES SHOULD CONTACT THEIR LINE MANAGER OR, IF PREFERRED, EMAIL ANY QUESTIONS OR COMMENTS TO CO.SEC@BURBERRY.COM.

Speaking Up

We believe in fostering a culture where everyone feels comfortable speaking up, whether to propose an idea, raise concerns or ask for help. To support this we have established two platforms for communication, including our Burberry Resolution Hub and Burberry Confidential.

Burberry Resolution Hub

Our Burberry Resolution Hub is designed to help our colleagues resolve concerns at an early stage by finding tools and resources that can support them. Colleagues can also raise a Resolution Questionnaire, which provides information to enable the business to evaluate the situation and determine the best way to resolve the concern.

HOW TO USE THE BURBERRY RESOLUTION HUB

All colleagues can access our [Burberry Resolution Hub](#) via Burberry World and are encouraged to consult the tools available through this platform before seeking alternative escalation routes.

Burberry Confidential

Burberry Confidential is a global confidential helpline, available in countries where we are present and where it is legally permitted. The service is provided by an independent company and designed for concerns of a serious nature. All calls and emails are logged, independently reviewed and responded to.

Burberry Confidential would typically be used to report the following types of breaches of our Code or policies (including potential breaches and attempts to conceal these breaches):

- Criminal offences, including modern slavery offences, fraud or misappropriation of assets including information/data.
- Safeguarding concerns.
- Failure to comply with our legal obligations.
- Breaches of the Anti-Bribery & Anti-Corruption and Gifts & Hospitality policies.
- Financial mismanagement (e.g. the manipulation of accounting or financial records, tax evasion or the facilitation of tax evasion by someone else).
- Dangers to the environment or health and safety or colleague wellbeing.

- Behaviour which might damage our reputation.
- Unauthorised disclosure of confidential information.
- Anti-competitive practices (e.g. agreements or exchanges of information on pricing between competitors, such as during tender processes or market-sharing agreements between competitors) and failure to disclose conflicts of interest.

HOW TO CONTACT BURBERRY CONFIDENTIAL

Phone

- For colleagues, the telephone numbers for each country are listed in the [Resolution Hub](#) on Burberry World.
- For external parties, all local numbers can be found on the [Burberry Confidential website](#).

Online

- All parties can access support via the [Burberry Confidential website](#), which is available in multiple languages.

In most cases, colleagues should not find it necessary to report their concerns externally. However, in some circumstances, a colleague may decide it is appropriate to do so.

FOR FURTHER INFORMATION ON WHAT CAN BE REPORTED USING THIS SERVICE, PLEASE READ OUR BURBERRY CONFIDENTIAL POLICY ON [BURBERRY WORLD](#).





Our Business

As a global business, we have a duty to operate responsibly.

In addition to inspiring and exciting our customers, we place the highest importance on their trust in our brand to safeguard their welfare and uphold their rights whenever they interact with us.

Ensuring adherence to local laws and regulations is fundamental to continuing to build trust with our community and maintaining our business reputation as a responsible employer and brand. Burberry's Company Secretary supervises our corporate governance processes with the support of our Legal team to ensure our policies on operating responsibly are enforced.

This section details key processes and policies in relation to how we operate responsibly and protect our brand.

Data Protection and Confidentiality

We work hard to comply with applicable data protection laws, regulations and guidance wherever we operate, ensuring that our customers and colleagues, as well as other individuals and stakeholders, can be confident in how we handle personal data.

Failure to comply with applicable data protection laws can lead to significant fines and other regulatory action, including criminal liability. We seek to protect personal data through a combination of people, processes and technology controls. Our colleagues and contractors must adhere to our Data Protection, Data Retention and Data Classification and Management policies at all times.

Colleagues who handle personal data as part of their roles should only access, collect and use personal data which is strictly necessary for a lawful and approved business purpose. Colleagues should be mindful of the need for confidentiality and compliance with data protection policies within Burberry.

Customer, colleague or personal data, or other sensitive and confidential information must not be shared with anyone else inside or outside of Burberry except on a 'need to know' basis. This includes where the recipient is authorised to have access to that information and where there is a lawful basis to do so in the case of personal data.

Any authorised sharing of personal data or confidential information must be done securely in accordance with approved processes. Colleagues who access, disclose or

otherwise use personal data in breach of any relevant policies may be committing a criminal offence and may also face disciplinary proceedings.

Anyone who leaves Burberry remains contractually bound not to disclose or make use of any confidential information or trade secret obtained during employment. This obligation will continue indefinitely.

FOR MORE INFORMATION ON THESE POLICIES, PLEASE VISIT [BURBERRY WORLD](#).

IF YOU HAVE ANY QUESTIONS REGARDING DATA PROTECTION POLICIES, PLEASE CONTACT DPO@BURBERRY.COM.

The Use of Burberry Assets and Technology

Access to Burberry information and information systems is provided for business purposes to ensure we stay connected as one global team. Colleagues who use technology at Burberry must ensure that they maintain Burberry's commitment to do so responsibly, ethically and legally.

Limited personal use that is consistent with good business practice and does not have an adverse impact upon or interrupt the efficient, lawful and ethical operation of Burberry's business or the individual's performance at work is permitted in line with the IT Acceptable Use Policy. Any misuse of Burberry software or hardware, including but not limited to, laptops, emails, telephones, mobile devices, internet or intranet systems will result in disciplinary action and may lead to dismissal or legal prosecution.

It is the responsibility of each and every colleague to ensure that Burberry information assets are handled, shared and stored in line with the IT Information Security Policy and Data Classification Management Policy. Confidential information must not be used for personal gain.

Burberry recognises that fast-developing artificial intelligence technologies now offer a wide range of capabilities for innovation and efficiency. They do, however, also present a unique set of challenges. Colleagues must therefore ensure that the use of artificial intelligence whether directly or by our suppliers, is in accordance with approved processes and is responsible, ethical, respects applicable laws and the rights of others and is in line with our Generative AI Principles.

FOR MORE INFORMATION ON THESE POLICIES AND PRINCIPLES, PLEASE VISIT [BURBERRY WORLD](#).

ALL COLLEAGUES ARE REQUIRED TO PARTICIPATE IN BURBERRY'S ANNUAL MANDATORY INFORMATION SECURITY TRAINING.

Product Recall and Withdrawal

When designing and making our products, we aim for the highest standards of quality and follow all international standards, laws and regulations. To support this, Burberry has a robust Product Recall and Withdrawal Policy, which applies to product-related issues.

If you become aware of a product issue, you must ensure that this is escalated in line with the process set out in the policy so that it can be fully investigated. This may include product issues identified at suppliers or vendors, during product testing, inspection, or in retail stores. Product quality failures or complaints must be promptly reported and will be resolved within two working days.

Burberry also requires that store managers ensure that all retail colleagues are aware of any product withdrawal or recall, that any inventory subject to a withdrawal or recall is removed from sale immediately and that any return instructions are completed by the required date.

READ OUR PRODUCT RECALL AND WITHDRAWAL POLICY [HERE](#).

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Inside Information and Burberry Share Dealing

As a company listed on the London Stock Exchange, Burberry is required to inform the public as soon as possible of any 'inside information' which directly concerns Burberry and communicate information to holders and potential holders of Burberry's shares in such a way as to avoid the creation or continuation of a false market in Burberry shares.

Inside information is information about Burberry that is not publicly available and which a reasonable investor would consider important when deciding whether to invest or not in Burberry shares or other securities. Anybody can have inside information and they might acquire it in a variety of ways.

If anyone has inside information, they must not use it to deal in shares, recommend or induce someone else to engage in insider dealing nor disclose the inside information. It is the Burberry Board's responsibility to ensure that Burberry has adequate procedures, systems and controls in place to enable it to comply with these obligations.

ALL BURBERRY COLLEAGUES MUST ENSURE THEY HAVE READ AND UNDERSTAND BURBERRY'S SHARE DEALING CODE ON [BURBERRY WORLD](#).

COLLEAGUES MUST NOT BUY, SELL OR ENTER INTO ANY OTHER TRANSACTIONS RELATING TO BURBERRY SHARES IF THEY HAVE INSIDE INFORMATION.

FAILURE TO ADHERE TO THESE POLICIES COULD BE A CRIMINAL OFFENCE.

Conflicts of Interest

We are committed to ensuring that all colleagues and others acting on behalf of Burberry are free from conflicts of interest that could influence their independence, integrity and judgement. This commitment is vital to safeguarding Burberry's reputation for fair and open business dealings and business strategy. To this end, all such persons must abide by Burberry's Conflicts of Interest Policy. If you are in any doubt, you should discuss the policy with your line manager or HR business partner. While working at Burberry, you must not undertake any employment or hold any office, which would create a Conflicts of Interest with Burberry's business.

Colleagues should avoid personal relationships with other Burberry colleagues where parties in the relationship may (or appear to) receive or give an unfair advantage or preferential treatment because of the relationship.

Similarly, in commercial relationships, all colleagues are also encouraged to avoid actions or relationships that may conflict (or appear to conflict) with their job responsibilities or the interests of Burberry. You must obtain prior management approval for any outside activities or positions, financial interests or relationships, which may cause a conflict or potential conflict to arise.

COLLEAGUES AT DIRECTOR LEVEL AND ABOVE ARE REQUIRED TO COMPLETE ANNUAL ONLINE DECLARATION OF INTEREST FORMS, EVEN IF THERE IS NO PERCEIVED CONFLICT.

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Accurate Records, Reporting and Accounting

Burberry must ensure that all financial and other business information which it maintains internally and shares with external stakeholders, such as investors and regulators is accurate, complete and in compliance with all applicable laws, external accounting and tax requirements and Burberry's policies and procedures.

Colleagues must not at any time falsify records or misrepresent information whether to internal or external stakeholders. Failure to record transactions in an accurate manner or preparing misleading company documentation (or assisting someone else to do so) could constitute fraud and result in fines or other criminal or civil liability for colleagues and/or for Burberry.

Colleagues who are responsible for reporting financial and other business information must comply with the applicable accounting principles in the country in which the reporting is made, including the requirements of relevant financial regulators, corporate governance codes and stock market listing standards and rules.

Burberry is required to keep certain information for defined periods of time and not delete or dispose of such information before any retention periods have expired. Examples include tax information, financial statements, contracts, certain marketing information, and HR documentation. All colleagues are responsible for managing records and information in accordance with the Burberry Data Retention Policy. Certain records and information may need to be retained beyond the normal

retention period for legal reasons. Such information will be subject to a legal hold order. If you are notified that you may have information subject to a legal hold order you must not alter, destroy, or delete it in any way.

All transactions and contracts must be properly authorised in line with the Financial Delegation of Authority Policy.

ALL COLLEAGUES MUST REPORT ANY ACTUAL OR SUSPECTED FRAUD OR INACCURATE RECORD-KEEPING TO BURBERRY'S GENERAL COUNSEL. THIS CAN BE DONE DIRECTLY OR THROUGH BURBERRY CONFIDENTIAL.

FOR MORE INFORMATION ON THESE POLICIES, PLEASE VISIT [BURBERRY WORLD](#).

Bribery, Corruption and Fraud

We do not tolerate bribery (a payment, gift or favour offered, sought or accepted to influence a business outcome), corruption (behaviour lacking in honesty and integrity) or fraud in any form. This stance is supported by our Anti-Bribery and Anti-Corruption Policy as well as our Fraud Risk Management Policy and Fraud Risk Management Framework.

We take all reasonable steps to prevent bribery, corruption and fraud across our operations. All colleagues and third parties associated with Burberry must conduct themselves in accordance with the highest ethical standards at all times. All gifts and entertainment must only be given or received in accordance with Burberry's Gifts and Hospitality Policy.

All retail colleagues must also comply with the limits for the acceptance of cash in store, whether in one transaction or a series of transactions, as detailed in our Cash Acceptance policies.

We carry out annual mandatory training for our colleagues, supplemented by targeted training for certain functions to ensure awareness and compliance with our policies regarding areas such as Anti-Bribery and Anti-Corruption, Gifts and Hospitality, Market Abuse Regulations and anti-money laundering. The prevention, detection and reporting of fraud, bribery or corruption is the responsibility of all colleagues.

Any incidents or potential areas of concern are scrutinised by highly experienced investigators in our Asset and Profit Protection team and bribery, corruption and fraud risks fall within the scope of internal audit reviews.

READ OUR ANTI-BRIBERY AND ANTI-CORRUPTION POLICY [HERE](#).

ALL COLLEAGUES MUST PARTICIPATE IN BURBERRY'S ANNUAL MANDATORY TRAINING, TOGETHER WITH ADDITIONAL TARGETED TRAINING FOR CERTAIN FUNCTIONS INCLUDING ANTI-BRIBERY AND CORRUPTION, GIFTS AND HOSPITALITY, MARKET ABUSE REGULATIONS, PREVENTION OF TAX EVASION AND ANTI-MONEY LAUNDERING.

ALL COLLEAGUES MUST REPORT ANY ACTUAL OR SUSPECTED MONEY LAUNDERING TO BURBERRY'S GENERAL COUNSEL OR COMPANY SECRETARY. THIS CAN BE DONE DIRECTLY OR THROUGH BURBERRY CONFIDENTIAL.

FOR MORE INFORMATION ON THESE POLICIES, PLEASE VISIT [BURBERRY WORLD](#).

Our Global Tax Strategy

Our tax strategy applies to Burberry Group plc, its worldwide subsidiaries and all officers, employees and third parties whose actions impact the management of Burberry's tax affairs. The tax strategy covers our approach in the following areas: governance, risk management and compliance, tax planning, dealings with tax authorities and tax risk management.

The Group is committed to acting with integrity and transparency on all tax matters and complying fully with all applicable tax laws, having regard to international standards and guidance on tax practice and tax reporting. We do not use tax structures or undertake artificial transactions, the sole purpose of which is to create a contrived tax result. Our tax processes, policies and governance procedures are designed to identify and mitigate material tax risks and apply consistent standards of tax compliance.

Burberry does not tolerate any colleagues, agents or partners (including vendors, customers, joint venture partners and agents) anywhere in the world engaging in, knowingly assisting or encouraging tax fraud.

We prohibit any form of tax evasion and facilitation of tax evasion. All colleagues are responsible for compliance with our Criminal Finances Policy on the Non-Facilitation of Tax Evasion and Prevention of Fraud. Colleagues must only engage with businesses and people that have successfully completed appropriate due diligence checks and onboarding requirements. All transactions and contracts must be properly authorized in line with the Financial Delegation of Authority Policy.

READ OUR GLOBAL TAX STRATEGY [HERE](#).

ALL COLLEAGUES MUST REPORT ANY ACTUAL OR SUSPECTED TAX FRAUD, FACILITATION OF TAX EVASION OR BREACH OF THE POLICIES IDENTIFIED ABOVE TO BURBERRY'S GENERAL COUNSEL. THIS CAN BE DONE DIRECTLY OR THROUGH BURBERRY CONFIDENTIAL.

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Sanctions and Export Control

Burberry requires all employees, contractors, vendors, joint ventures and other third parties or providers to comply with all applicable sanctions and export control laws. Burberry may come into contact with subjects of international sanctions laws. These laws restrict who we can do business with, either because they are specifically targeted by sanctions or because the country/territory they are in is subject to trade embargoes. Sanctions have increasingly been adopted by governments and international bodies to enforce international security and to deal with anti-terrorism, international legal obligations, and human rights issues. Export control regimes have been imposed by many governments to impose controls on the export of certain items for a variety of reasons, including national security, foreign policy, and anti-proliferation.

Failure to comply with applicable sanctions and/or export control laws may expose Burberry (and/or individuals) to the risk of criminal prosecution as well as financial penalties and severe reputational damage. It is important that all colleagues read the Burberry Sanctions & Export Control Policy on Burberry World to familiarise themselves with the essential aspects of the policy and related procedures.

READ OUR SANCTIONS & EXPORT CONTROL POLICY [HERE](#).

Competition and Anti-Trust Law Compliance

We are dedicated to compliance with all competition and anti-trust laws wherever the same apply to our business in order to help promote fair competition in the marketplace.

No colleagues must ever enter into discussions, communications, understandings or agreements with competitors on commercially sensitive matters. Should you be approached by a competitor on such matters, please refer this immediately to the Legal team.

You should never obstruct our wholesale customers' ability to freely set their resale prices and must always refrain from any action which may have the effect of restricting competition. Breaches of such laws carry serious consequences not only for Burberry, but for the individuals involved, and these can be both criminal and civil in nature.

READ OUR COMPETITION AND ANTI-TRUST LAW POLICY [HERE](#).

Partner Compliance

We strive to work with our business associates to ensure compliance with the Responsible Business Principles and, where applicable, any Letter of Undertaking. Our Partner Non-Compliance Policy is designed to give our business associates a reasonable amount of time to rectify any critical issues to minimise any potential and/or detrimental impact on the workers' livelihoods, subject always to, and without prejudice to, any rights which we may have in contract or otherwise.

Where partners do not demonstrate sufficient commitment to or are in breach of (or reasonably suspected of being), the standards set out in the Responsible Business Principles or, where applicable, the terms of any Letter of Undertaking, Burberry may take action in respect of the partner. This action may include terminating our direct business relationship with the partner or requiring that the relevant partner is no longer used by other business associates in any part of the supply of products or services to Burberry.

The Partner Non-Compliance Policy is designed to give a business associate a reasonable amount of time to rectify the critical issues to minimise any potential and/or detrimental impact on workers' livelihoods.

READ OUR PARTNER NON-COMPLIANCE POLICY [HERE](#).

Trade Compliance

We are committed to cooperating with customs authorities to ensure that all product shipments are compliant with international principles and national legislation. Burberry is an Authorised Economic Operator (AEO) accredited in the UK. AEO status is an internationally recognised quality mark, awarded to businesses able to demonstrate that their role in the international supply chain is secure and that they exercise customs controls and procedures that meet UK and EU standards. All colleagues must comply with AEO principles. These include people with access to Burberry sites wearing clear identification at all times and declaring all goods moved across international borders, including any hand-carried goods, with appropriate customs documentation.

It is vital that all colleagues who intend to hand-carry goods are familiar with the necessary preparation, customs processes (including time required for customs clearance), and documentation required. Colleagues who do not adhere to these processes or instruct others to hand-carry goods on their behalf without the relevant documentation are at risk of committing a criminal offence, bringing Burberry into disrepute, potentially leading to Burberry's AEO status being revoked, and may also face disciplinary proceedings. If you have any questions, please contact a member of the Trade Compliance team at customs@burberry.com.

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Retail Standards

We always put our customers first. In addition to providing a seamless customer experience, we place the highest importance on customer safety, welfare and respect, whether that be through our customers' enjoyment of Burberry products or through their engagement with the brand in our stores or otherwise.

Ongoing training is delivered digitally and in person to ensure consistent luxury selling behaviours and operational standards across all regions and channels. All retail colleagues are required to adhere to the standards outlined in our retail training app, RSpace, and the Burberry Store Manual. These channels offer training and resources on the client journey and expectations, product knowledge, luxury selling behaviours, store standards, compliance, and payments.

ALL COLLEAGUES MUST ENSURE THAT THEY READ AND UNDERSTAND ALL RETAIL EXPECTATIONS, POLICIES, PROCESSES AND GUIDELINES AVAILABLE ON RSPACE AND IN THE STORE MANUAL.

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Brand Protection

We are proud of our heritage and we seek to protect our brand and reputation in all aspects of our business operations. The Brand Protection Policy, which all colleagues and contractors must abide by, is supplemented by processes and guidance including Product Authentication, Reporting of Counterfeit Merchandise, Creative Clearances, Disposals, Aftercare and Returns.

Burberry's Brand Protection team is responsible for protecting and enforcing our intellectual property rights globally, both online and offline, while working to mitigate risks to our rights and reputation. Our actions against unauthorised use of our branding and designs support Burberry's ability to sell products in the markets it chooses, protecting our revenue, our brand equity and our reputation. These efforts also protect consumers from illicit activity and harmful counterfeit products. In addition, the team ensures that Burberry's creativity is supported while giving due respect to the intellectual property rights of others.

It is important that all colleagues take infringement matters seriously. If you discover products that you believe may infringe Burberry's rights, please escalate the matter to the Brand Protection team with as much information as possible at brand.protection@burberry.com or in the Brand Protection Viva Engage group.

READ OUR BRAND PROTECTION POLICY [HERE](#).

External Communications and Social Media

We encourage our colleagues and partners to celebrate brand moments and personal achievements on their personal social media channels.

To enable them to communicate in a way that is supportive and respectful to all our communities, we have provided guidance as to what is deemed appropriate conduct and behaviour in our Social Media Policy. This policy is in place to help our colleagues remain true to our values, protecting not only our brand, but also our colleagues and their personal information. It details key information on content sharing, including a checklist of key considerations to follow for personal accounts. It also strictly prohibits inaccurate or offensive content and the sharing of any confidential information regarding Burberry or another individual. We have a zero-tolerance policy on any offensive or discriminatory content. Any breach of this policy could result in disciplinary action.

Through Burberry's corporate channels, we provide stakeholders with clear and accurate information about our products and timely, factual news to ensure they are kept up to date with business developments. All our external statements remain confidential until approved and published on these channels. From campaign assets to live event content, such as our runway shows, our Social Media teams operate with stringent processes to guide approval for creating imagery and subsequent posting to Burberry's social media. Everyone at Burberry is encouraged to engage with our published content on our social media channels.

EXTERNAL ENGAGEMENT

Building trust and credibility with our stakeholders is an important part of our external communications. We regularly engage with industry and civil society through speaking opportunities, such as events or conferences, and with members of the global press community. These engagements are reserved for Burberry spokespersons, including Vice Presidents, Senior Vice Presidents and members of Burberry's Executive Committee and Board. Exceptions are granted to other Burberry colleagues on a case-by-case basis.

Colleagues should seek relevant approval through their line manager and Vice President as well as from the Corporate Relations team to ensure all external engagement opportunities are carefully considered and all communications surrounding any events or engagements are approved.

READ OUR SOCIAL MEDIA POLICY [HERE](#).

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).



Our People

People are at the heart of our business and our operations. Our colleagues, partners and those in our supply chain are critical to our success, and we are committed to creating a safe, fair and inclusive environment where individuals from all backgrounds can collaborate and flourish.

To support this, we have translated our company values into tangible, measurable actions that serve as a reference for what is expected from everyone at Burberry.

Our commitment to supporting our people and their wellbeing extends to those across our value chain. Core to this agenda is respecting and upholding human rights, combating the risk of modern slavery, and increasing transparency throughout our supply chain.

This section outlines the policies that reinforce our commitments to our people and includes our approach to diversity, equity and inclusion, health and safety, ethical trading standards and the protection of human rights.

Diversity, Equity and Inclusion

We expect all colleagues to treat each other with respect and behave with integrity. We do not tolerate offensive behaviour of any kind, including harassment, bullying or victimisation.

Underpinning our approach is our Global Diversity, Equity and Inclusion Policy, which sets a global standard for how we can foster an inclusive environment that encourages diverse capabilities, skill sets and mindful allies. Central to our culture is our zero tolerance for discrimination in any form.

Individuals with certain characteristics are expressly protected by our policy. These include religion or belief; gender; gender reassignment; gender identity or expression; age; sexual orientation; disability; mental health; marital or civil partner status; pregnancy or maternity; part-time/fixed-term work; ethnicity; race; national origin; military or veteran status; and socio-economic status, together with any other characteristic protected by law (known as 'protected characteristics').

Compliance with this policy is mandatory, and it is accompanied by a guide for managers to help them lead inclusively, build diverse teams and fully integrate our approach into their teams' behaviours. We also expect all our suppliers and partners to uphold similar standards at all times. We are all responsible for making sure the principles outlined in our Global Diversity, Equity and Inclusion Policy are embraced, adhered to, and upheld.

We have implemented training programmes for our teams to mitigate bias across decision-making and ensure all colleagues are equipped to contribute to an inclusive culture. This includes annual unconscious bias and allyship training.

We are committed to fostering an inclusive culture, supporting our colleagues at all stages of their lives during their careers with Burberry. As part of this, we have a Global Parental Leave Policy, offering colleagues 18 weeks of parental leave at full pay and the opportunity to work 80% of their normal hours at full pay for a further four weeks on their return. We have also introduced menopause support, a Trans and Non-Binary Inclusive Language Guide and continually review our policies and benefits to ensure they are inclusive of everyone.

We champion voices across our organisation through our community of practice, which includes our Global Equity Council, Employee Resource Groups and Cultural Advisory Council. This community helps us to drive engagement, raises emerging issues and challenges, explores solutions and acts as a sounding board for Burberry on our diversity, equity and inclusion journey.

READ OUR GLOBAL DIVERSITY, EQUITY AND INCLUSION POLICY [HERE](#).

LEARN MORE ABOUT OUR APPROACH TO DIVERSITY, EQUITY AND INCLUSION [HERE](#).

CONNECT WITH THE DE&I TEAM DIRECTLY BY EMAILING DANDI@BURBERRY.COM

Benefits

We offer a competitive package of rewards and benefits to enable our global workforce to thrive. These include – but are not limited to – a generous holiday allowance, competitive pension contributions, support with healthcare, employee discounts and performance-related incentives. We also believe in showing appreciation for colleagues who have invested years of service by rewarding them with long service awards, which include cash bonuses and an enhanced holiday allowance.

We expect all colleagues to adhere to guidelines around how these benefits can be used at all times. Any violation or misuse of these benefits could result in disciplinary action.

FOR ANY QUESTIONS REGARDING YOUR BENEFITS AT BURBERRY, PLEASE ASK YOUR LINE MANAGER OR HR REPRESENTATIVE.

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Wellbeing

We are committed to designing spaces for creativity to flourish by putting wellbeing at the heart of every day. With a range of programmes and initiatives designed to help our colleagues create healthy, sustainable working practices, we ensure our wellbeing priorities are closely linked to our diversity, equity and inclusion agenda so that we can support as many individual needs across Burberry as possible.

To ensure our global colleagues always feel supported, our people are given free access to a dedicated wellbeing space on Burberry World which hosts online information, tools and interactive resources to help support the mental, physical and financial health of our colleagues.

Throughout the year, we also offer seasonal programmes that remind our colleagues across the business of the importance of wellbeing and how to foster this within their respective teams. As part of these programmes, full-time colleagues are offered at least five days of paid leave, separate to their annual allowance, to take as wellbeing days. Other initiatives that support our people's wellbeing include a dedicated menopause site, a conflict resolution framework and our Employee Assistance Programme, which offers counselling and specialist guidance on a range of topics.

LEARN MORE ABOUT BURBERRY'S APPROACH TO WELLBEING AND AVAILABLE RESOURCES [HERE](#).

FOR QUESTIONS OR CONCERNS, PLEASE REACH OUT TO YOUR LINE MANAGER, HR REPRESENTATIVE OR ESCALATE VIA BURBERRY CONFIDENTIAL.

Health and Safety

We are committed to providing a safe and healthy environment for our colleagues, customers and anyone who visits or works on Burberry premises. To that end, our Global Health and Safety Policy details the key processes involved in ensuring we maintain the highest standards of health and safety throughout our global operations.

Colleagues have an individual and collective role to play in safeguarding their own health and safety and that of their teams. Anyone working for or with Burberry must maintain the highest health and safety standards and adhere to the relevant instructions or policies provided. Burberry sets annual health and safety targets, which all colleagues must strive to meet; colleagues are required to complete mandatory health and safety training, and work in partnership with internal and external parties to help ensure compliance.

In order to protect the health and safety of all colleagues, the misuse of drugs and alcohol will not be tolerated. Where this results in harmful behaviour, the incident could result in disciplinary action being taken.

READ THE HEALTH & SAFETY POLICY [HERE](#).

Business Travel and Expenses

As a global business, our colleagues may need to travel both domestically and internationally. When travelling for work, our people must abide by our Global Travel and Expenses Policy, as well as act both safely and responsibly.

Our Global Travel and Expenses Policy sets out our colleagues' responsibilities before, during and after travel, as well as the thresholds and procedures to follow when incurring business expenses. The policy ensures that all colleagues have a clear and consistent understanding of our company standards and that all business travel complies with relevant tax legislation. The procedures outlined also safeguard the safety, security and wellbeing of our colleagues and help them to ensure smooth reimbursement of all reasonably incurred expenses.

All colleagues are required to comply with the Global Travel and Expenses Policy, and it is the responsibility of all colleagues to familiarise themselves with the policy as well as to follow the agreed procedures.

READ OUR GLOBAL TRAVEL AND EXPENSES POLICY [HERE](#).

Responsible Business Principles and Ethical Trading

We are committed to operating in an ethical manner and to upholding and respecting human rights. In doing so, we prohibit any non-compliance with our ethical trading practices, and we require our supply chain partners, whether they are providing products or services, to agree with our Responsible Business Principles. These Principles are a set of ethical policies that guide our business practices.

The Principles include the Burberry Code of Ethical Business Principles, Anti-Bribery and Anti-Corruption Policy and Global Environmental Policy, and the following six policies: Burberry Human Rights Policy, Burberry Ethical Trading Code of Conduct, Burberry Migrant Worker Policy, Burberry Child Labour and Young Worker Policy, the Burberry Partner Non-Compliance Policy and the Burberry Responsible Raw Materials Sourcing Policy.

The Principles apply to all our business associates, which include, but are not limited to raw material suppliers, finished goods suppliers, subcontractors, supporting facilities, non-stock suppliers, construction contractors, licensees and franchisees.

All colleagues working with supply chain and other external partners must ensure these principles are communicated to all partners and that the policies set out within them are clearly understood. Teams working with partners are accountable for non-compliance with these principles and the policies set out within them.

READ ALL POLICIES WITHIN OUR RESPONSIBLE BUSINESS PRINCIPLES ON [BURBERRY WORLD](#).

Human Rights

We respect and uphold human rights wherever we operate. We are committed to taking action and making meaningful and lasting improvements to employment practices and workplace conditions. Our Human Rights Policy sets out key procedures across our own operations and extended supply chain. To ensure compliance, which is mandatory, we assess human rights impacts and monitor labour conditions across our own operations and our extended supply chain on a regular basis. All colleagues have a responsibility to ensure all business associates, are compliant with the procedures set out in the policy and monitor labour conditions throughout the extended supply chain.

We seek to ensure that all colleagues and workers in our supply chain have access to confidential support and advice. We encourage employees to raise concerns through Burberry Confidential, our grievance mechanism, and we also sponsor confidential hotlines run by NGOs for workers in our supply chain, which provide advice on workers' rights and wellbeing, and confidential support.

READ THE HUMAN RIGHTS POLICY [HERE](#).

Migrant Workers

We do not tolerate any form of worker exploitation. Burberry's Migrant Worker Policy is intended to protect workers who may be vulnerable during domestic and/or international migration. Our policy sets out the standards we maintain for our own colleagues and for our supply chain partners to uphold for their workers, irrespective of the reasons for such migration. The policy promotes workers' rights with respect to recruitment, remuneration, identification documents, repatriation and living conditions. All colleagues have a responsibility to ensure all supply chain partners understand and adhere to the standards set out in the policy and to safeguard migrant workers' rights within the supply chain.

READ THE PROTECTING MIGRANT WORKERS POLICY [HERE](#).

Child Labour

We do not tolerate any form of child labour across our operations and supply chain. We set out this position in our Ethical Trading Code of Conduct and our Child Labour and Young Worker Policy, to which all of our supply chain partners are contractually required to adhere.

READ THE CHILD LABOUR AND YOUNG WORKER POLICY [HERE](#).

Our Modern Slavery Statement

More information about our human rights due diligence, engagement and key programmes can be found in our Modern Slavery Statement, published annually. This statement is published in accordance with the Section 54 of the Modern Slavery Act 2015, the Canada Fighting Against Forced Labour And Child Labour In Supply Chains Act 2023, the Australian Modern Slavery Act 2018, and the California Transparency in Supply Chains Act of 2010 (SB 657).

READ THE MODERN SLAVERY STATEMENT [HERE](#).

Model Wellbeing

The wellbeing of models who feature in our presentations, content and campaigns is of the utmost importance to us and we prohibit any conduct that negatively impacts their wellbeing while working with Burberry. We have a comprehensive Model Wellbeing Policy that sets out our requirements and is reviewed and updated to ensure alignment to Burberry standards. Central to this is that all models are treated with respect and that all necessary steps are taken to protect their health, safety and wellbeing at all times.

A designated Burberry representative is available at all engagements to provide support to models and ensure that all voices are heard, values are respected, and issues are escalated as appropriate.

Compliance with Burberry's Model Wellbeing Policy is mandatory for anyone who interacts with models on Burberry's behalf, including colleagues, freelancers, casting agents, contractors and external third parties. Any issues arising under the Model Wellbeing Policy and all instances of non-compliance with the policy are reported to Burberry's Ethics Committee.

READ THE MODEL WELLBEING POLICY [HERE](#).



Our Planet

As an open and caring company, we are committed to behaving responsibly towards our planet, nature and the global communities we impact. As part of this commitment, we are actively working to reduce our environmental footprint, support the protection of nature and use more responsibly sourced raw materials in our products.

We believe that all colleagues have a role to play in delivering against the targets set out in our responsibility strategy, Burberry Beyond. We seek to inspire, educate and equip our people with the tools to do so through training, events, strategic communications and engagement opportunities.

This section outlines the policies we expect our colleagues and business associates to adhere to with respect to the environment, while following all local laws and regulations. These policies cover climate including biodiversity, waste, water and chemicals along with the responsible sourcing of raw materials.

Climate

Our ambition is to reach Net Zero¹ greenhouse gas emissions by 2040. Transitioning to renewable energy and managing the energy consumption of our own operations are central to our efforts to achieve Net Zero. Our emissions reduction targets are aligned to a 1.5°C pathway and have been validated by the Science-Based Targets initiative (SBTi) against their Corporate Net-Zero standard. This sits alongside our targets to extend our sustainable manufacturing initiatives covering chemicals, water and waste management, both within our own manufacturing and across our supply chain.

To help us reach our goals, our Global Environmental Policy sets out the environmental standards we uphold across our own operations and within our extended supply chain. This policy covers the natural resources we use and how we use them, including carbon and air emissions, water, waste and chemicals management. In support of biodiversity, we aim to protect, restore and regenerate nature across our supply chain. Our policy also requires our business associates to ensure that materials used in our products, packaging and goods not for resale do not contribute to deforestation. We also work to ensure our marketing campaigns and activities follow our Sustainability Principles for marketing and production, which include strict criteria on biodiversity risks and nature conservation.

Our Global Environmental Policy forms part of our Responsible Business Principles and compliance with it is mandatory. We expect our teams to use the policy to help them work closely with our partners to improve chemical management, reduce energy and water consumption, protect nature, and increase the use of renewable energy wherever possible.

READ THE GLOBAL ENVIRONMENTAL POLICY [HERE](#).

¹In accordance with the Science Based Target initiative's definition of Net Zero

Waste

While continuing to let our creativity flourish, we seek to minimise waste at all stages of our supply chain. Colleagues involved in the design, development, production and manufacturing of products are expected to put every effort to minimise waste. We follow clearly defined waste hierarchy principles to guide our workstreams. Where we have excess materials or unsaleable finished goods, we reuse, recycle or donate them in accordance with our Global Disposals Policy which prohibits the destruction of unsaleable finished goods.

To ensure that our brand is properly safeguarded throughout the disposal process, we have mandatory brand protection guidelines. All colleagues must obtain approval from the Brand Protection team in all instances in which products bearing our intellectual property will be repurposed outside of the Burberry distribution network or sent for donation.

READ MORE ON OUR APPROACH TO WASTE [HERE](#).

Water and Chemicals

In line with our commitment to protect our communities and ecosystems, we are mindful of how we use water throughout our supply chain. We track and promote management practices and technologies that facilitate water recycling and use water-efficient materials. We prohibit the use and release of unwanted chemicals. This is reflected in our Chemical Management programme.

All colleagues working with supply chain partners are expected to reinforce these protocols with them and implement adequate checks to monitor partners' practices to ensure full compliance with Burberry's standards, processes and policies.

READ MORE ON OUR PROCESSES AND PROTOCOLS [HERE](#).

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Responsible Raw Materials Sourcing

We are committed to responsible and sustainable business practices across our global supply chain. Our Responsible Raw Materials Sourcing Policy sets out the high standards we uphold and how we manage the environmental and social impact of the raw materials we source. We do not use real fur in our products or test our products on animals. We also work with our Beauty licensee, Coty, to ensure that Coty, or any third party working on our behalf, does not perform testing of our products on animals, except as required by law. The policy is also designed to ensure that we respect biodiversity in the wider environment where we and our supply chain partners could have a negative impact.

All colleagues working with supply chain partners are required to reinforce this policy with all parties and implement adequate checks to monitor suppliers' and vendors' practices and ensure compliance.

READ THE RESPONSIBLE RAW MATERIALS SOURCING POLICY [HERE](#).



Our Communities

Our founder, Thomas Burberry, was a passionate advocate for social reform and we seek to continue his legacy today by continuing to respect the communities and environments in which we operate and to meaningfully supporting those in need.

This section focuses on how we live by our values and spans our policies and approach to community investment.

Community Investment

We continue our founder Thomas Burberry's legacy by supporting young people, championing our communities and collaborating with organisations to make a positive impact on the world.

Burberry's community investment takes various forms, including financial support, employee volunteering and in-kind donations. Since 2010, Burberry has allocated at least 1% of adjusted Group profit before tax to support charitable initiatives around the world. A large portion of this allocation is donated to The Burberry Foundation (Charity number: 1154468), a registered charity that operates independently from Burberry Group plc.

Our Community Investment Policy & Procedures document outlines our approach to community investment, charitable donations, humanitarian relief, and employee volunteering and fundraising.

Oversight and governance are provided by Burberry's Corporate Responsibility team and our Ethics Committee.

Colleagues are required to register any proposed charitable donations (both cash and in-kind), as well as sponsorship or partnership initiatives with charitable organisations. This involves submitting a Charitable Donations Form for internal review and approval by the Corporate Responsibility team.

READ OUR COMMUNITY INVESTMENT POLICY & PROCEDURES DOCUMENT [HERE](#).

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Volunteering and Match Funding

Everyone at Burberry has a role to play in driving positive change. Following Thomas Burberry's example, we encourage all Burberry teams to support their local communities through:

Volunteering Days and Fundraising

We create space for all colleagues worldwide to dedicate up to three working days per year to volunteering, in addition to other leave entitlement. Colleagues can volunteer together with a team or as an individual to support one of our strategic partners or a charity of their choice.

Volunteering and fundraising opportunities with pre-approved organisations are available on our global volunteering and fundraising platform, Spark, and shared via the Our Communities network on Viva Engage. If colleagues wish to volunteer or fundraise in support of organisations not registered on Spark, they are required to reach out to the Corporate Responsibility team before initiating any engagement with the organisation.

Match Funding

Burberry matches funds raised by any team fundraising activity for a minimum of £100 to a maximum of £3,000 (or local currency equivalent), where groups of five or more colleagues are working together to help a charitable cause. Multiple match funding applications cannot be requested for the same event. All charitable causes must also be aligned with Burberry's values and charity recipients must be registered or have non-profit status.

ALL VOLUNTEERING AND FUNDRAISING OPPORTUNITIES ARE SUBJECT TO APPROVAL BY LINE MANAGERS AND WHERE THE OPPORTUNITY IS NOT AVAILABLE ON SPARK, APPROVAL BY THE CORPORATE RESPONSIBILITY TEAM IS REQUIRED.

FOR FURTHER INFORMATION, PLEASE REFER TO SECTION 3 OF OUR COMMUNITY INVESTMENT POLICY AND PROCEDURES [HERE](#).

FOR MORE INFORMATION, PLEASE VISIT [BURBERRY WORLD](#).

Local Stakeholder Engagement

We are committed to protecting the local communities where we operate and taking preventative measures to avoid incidents where possible.

Our Local Stakeholder Engagement Policy applies when a local stakeholder reports to a Burberry colleague an issue or risk that has arisen due to Burberry operations or activities. All colleagues must follow this policy so that all parties can work to address the issue or risk in question immediately and find a solution. Such incidents may include littering, obstructions, noise or lighting in offices or stores.

READ OUR LOCAL STAKEHOLDER ENGAGEMENT POLICY [HERE](#).



Key Contacts

If you have any questions or feedback about this document, please email Co.Sec@burberry.com

If you have any questions or concerns about any of our policies or processes, please contact your line manager, submit a query through AskHR or contact your HR representative.

To escalate any issues regarding a violation of policies or processes, please use Burberry Confidential. The details of this can be found on page 8 of this document.

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