

# Burberry Confidential, Our Whistleblowing Policy

**BURBERRY**

# DOCUMENT CONTROL

## Document History

Version	Date	Reviewer	Summary of changes
1.0	November 2022	Claire Salter	Align Burberry Confidential with the Resolution Hub

## Approval

Role	Name	Job Title
Owner	Rachel Reid Ellaby	Senior Employment Counsel
Approver	Ed Rash	General Counsel
Custodian	APP Team	

**Next Review Date: November 2024**

## **BURBERRY CONFIDENTIAL, OUR WHISTLEBLOWING POLICY**

We are committed to ensuring we conduct our business with honesty, integrity and in accordance with our Code of Conduct together with applicable laws and standards.

Aligned with our open & caring value, we strive to create a culture where everyone has a voice. Our expectation is that everyone at Burberry meets our high standards of integrity towards our people, customers, partners and the communities in which we operate, and we welcome opportunities to put things right if we do not meet these standards.

This policy sets out our commitment to encourage and protect those who speak up about serious concerns they may have about our business, and our determination to take action to resolve legitimate concerns.

### **Zero-tolerance for retaliation against those who raise concerns**

To help us improve, we need those who have concerns to speak up, and we want them to do so without worrying about any negative consequences. Anyone who raises a concern using this policy, or participates in an investigation into a concern, will be protected from any detrimental treatment or retaliation, even if the concern is not upheld. We will not tolerate retaliation of any type and will not hesitate to take action against anyone who is found to have threatened or carried out retaliation.

### **What is covered by this policy?**

We encourage everyone to raise opportunities for us to improve, but less formal channels should be used where this is suitable, as our experience is that these more successfully allow resolution of most concerns. Our Resolution Hub on Burberry World provides colleagues with information to help them decide the best way to resolve concerns, and we'd encourage you to review the information in the Resolution Hub before raising concerns through this policy.

We don't want to set limits on what can be reported through this policy, but our experience is that it would typically be used to report the following types of breaches (or potential breaches or 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
- Dangers to health or safety
- 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

We urge anyone with genuine concerns to come forward as soon as possible before the problem becomes more serious.

If your concern does not relate to one of the above breaches, then we would encourage you to review the information on the Resolution Hub to understand if there may be a better way to resolve your concern.

### **How to raise a concern under this policy**

Burberry Confidential is managed by an independent company.

Concerns can be raised:

- Via the Burberry Confidential website  
This service is available in multiple languages.  
Website: <https://www.burberry.ethicspoint.com/>

- By phone  
Each country has its own specific number where you will be able to leave a recorded voice message in your local language. You can find the phone number for your country on [Burberry World](#).

Whichever method you choose to raise your concern, you will be given a unique case number. You should keep a record of this number because you will need it if you call or log in for an update.

### **What information should I provide?**

To help ensure we can investigate your concern promptly, you should:

- Provide as much information as possible. This could include the background, names, dates, places and reason why you are concerned.
- Send us any documents that you have relating to your concern.
- Leave your contact details, so that we can ask you for further information and keep you updated. You may, if you wish, remain anonymous, but the more information that we have, the easier it will be for us to investigate the matter properly.

Do not worry if you do not have all the facts. You should speak up as soon as possible to allow us to investigate whether action needs to be taken. If your concern turns out to be mistaken, but was a genuine concern, no disciplinary action or other steps will be taken against you.

### **Confidentiality**

We encourage you to voice any concerns openly under this policy. It is possible to report concerns anonymously in most countries, but we encourage individuals to

provide their details when raising concerns, as this will help ensure we can carry out a thorough investigation into the concerns.

Your identity will be treated as strictly confidential by our independent third party provider and those investigating your concern. We will obtain your consent before disclosing your identity more widely, and this will only be requested if necessary for the purposes of investigating your concerns or taking further action associated with the concerns that you have raised. The only other instances where we may disclose your identity are where this is required by local law or if there is an immediate risk of harm and disclosure is necessary to prevent this harm.

### **Investigation and Outcome**

If you raise a concern through Burberry Confidential, it will be promptly reviewed by our trained teams. It will normally be escalated to the appropriate specialists for investigation. If it does not relate to a matter listed in this policy, we may recommend that it is dealt with through our Steps to Resolution framework. If that is the case, we will explain this to you.

We recognise that we need to act quickly to ensure concerns can be addressed, but also that we need to ensure appropriate time is dedicated to fully investigating concerns to ensure we understand the full picture. We aim to ensure that we complete all investigations and respond to the individual who raised the concern within three months, but in practice we are often able to do this much more quickly.

When the investigation is finalised, this will be communicated to you. If you are unhappy with the decision that has been taken and would like to provide further information so that the decision can be reconsidered, you should ask for the outcome to be reviewed.

If we conclude that you have made false allegations maliciously or with a view to personal gain, you may be subject to disciplinary action, the termination of your employment contract, engagement or assignment and/or legal action.

### **Data processed**

When you report a concern to Burberry Confidential, the following data will be logged and processed by our independent third party provider and Burberry:

- Your identity, role and contact details, unless an anonymous report is submitted (where permissible);
- The identity, role and contact details of the individuals who are the subjects of the report;
- The identity, roles and contact details of the recipients of the report;
- Details of the facts reported;
- Information and documents (if any) gathered in connection with the investigation and verification of the facts reported;
- An account of the investigation and verification operations (i.e. what decision is taken in respect of report and the process behind that); and

- Any follow-up correspondence or other documentation in relation to the report.

The above data will be collected and processed only if they relate directly to your report and/or if they are strictly necessary to investigate the report.

Within the limitations set out above, the person assigned to investigate your concerns may require additional information from you. If you have not left your contact details, you should check in at regular intervals to see if further information is needed.

#### **Notification of the person who is the subject of a report**

The identity of an individual who is the subject of a report will be kept confidential by the third party provider, any other recipients of the report within Burberry and/or by any other individuals involved in the investigation.

Any individual who is the subject of a report has the right to be notified of (i) the facts reported; (ii) the recipients of the report; and (iii) where this applies, his or her rights of access and correction and the right to object to the processing of his or personal data. This notification will be made once the data relating to this individual is processed but may be delayed if and when it is necessary to take precautionary measures, including, for example, to prevent the destruction of evidence relating to the investigation. In such cases, notification will be made promptly after the implementation of these measures. If a report which has been made is found to be vexatious or unfounded, no further action will be taken, the individual who is the subject of a report will not be notified and the related data will be immediately deleted.

#### **Retention of data**

All necessary precautions are taken to ensure and preserve the security and confidentiality of data collected in the context of this policy, including when such data is collected, processed and communicated. Data on the relevant systems will only be able to be accessed by means of an individual username and password or equivalent security measures. Access to the data is logged and regular checks of access logs are made.

In the absence of disciplinary action, other action or legal proceedings, the data collected will be deleted or archived within two months of completion of the relevant investigation.

If a person who is the subject of the report, or a discloser submitting a false, malicious or misleading report, is subject to disciplinary action, other action or legal proceedings, the data collected via the report will be retained until conclusion of the disciplinary action, other action or legal proceedings (as relevant).

After being retained in accordance with the above, the data will be archived in a separate information system with restricted access for such retention periods as are required or otherwise permitted by law. At the end of such period, the data will be promptly destroyed.

**Further information relating to data processing**

For further information about how Burberry processes your personal information, including information about your rights and how to exercise them, please see the Employee Privacy Notice which can be found on [Burberry World](#).