

BURBERRY
LONDON ENGLAND

CHILD LABOUR AND YOUNG WORKER POLICY

REVIEWED: MARCH 2021

OUR COMMITMENT

As a company we prohibit all forms of child labour in our own operations and supply chain. The use of child labour is unacceptable and can harm children's education, health, mental or social development.

In our Ethical Trading Code of Conduct, we state that we will never use child labour and outline provisions for young workers (a 'young worker' is a young person above the minimum legal age requirement and below the age of 18).

For more information please see:

<https://www.burberryplc.com/en/responsibility/policies/people/ethical-trading-code-of-conduct.html>

DEFINITIONS

'Child Worker' refers to a person below the age of 15, or below the applicable minimum legal age requirement, whichever is greater, as defined in the ILO Convention No. 138 on the Minimum Age for Admission to Employment (1973).

"Business Associates" refers 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.

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
- all production sites of any Business Associate
- non-stock vendors
- construction contractors (and their construction sites)
- franchisees

- licensees
- joint-venture partners
- consultants
- contractors
- wholesale customers
- service providers
- agents
- landlords, and
- any subcontractor of the above

‘Young Worker’ refers to a young person above the minimum age outlined in the definition of “Child Worker” and below the age of 18.

‘Hazardous Conditions’ refers to the conditions outlined in Article 3 (d) of the ILO Convention No. 182 on the Worst Forms of Child Labour Convention (1999): work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children. This includes but is not limited to: exposure to hazardous chemicals; operating heavy machinery; manual lifting; working overtime; or working at night.

SCOPE OF THE POLICY

This Child Labour and Young Worker Policy applies to all Business Associates, as defined above.

1. Basic Provisions

1.1 There shall be no Child Workers in Burberry’s supply chain, including but not limited to, within factories and home working arrangements.

1.2 Young Workers shall not be employed at night or in Hazardous Conditions.

1.3 Burberry and its Business Associates will always conform to the relevant ILO standards.

2. Implementation

2.1 Business Associates must have a suitable, fully functional and up-to-date age verification system in place that includes review of identification documents. Documentation stating each worker's age must be available at all times for review by Burberry and/or its authorised representatives, agents or professional advisors.

2.2 Business Associates must maintain a complete and accurate employee roster including employee name, department, date of birth and start date.

2.3 Young Workers must be included in the risk assessments of the Business Associate's facilities so that the relevant hazardous work restrictions can be applied.

3. Remediation

3.1 If a Burberry employee has any concerns regarding any Child Workers or the presence of Young Workers in our own operations and supply chain (including any Business Associate's workforce), they must contact the Burberry Responsibility team immediately.

3.2 If any Child Workers are discovered within a Business Associate's workforce or the workforce of any of its group members:

- It must be reported immediately by email to the Burberry Responsibility team at the following email address: corporate.responsibility@burberry.com.
- The Business Associate must immediately safeguard the wellbeing of the child;
- Burberry will work with the Business Associate and, if applicable, a relevant local NGO to develop a remediation plan in respect of the Child Worker;
- If appropriate, Burberry and/or the Business Associate (as mutually agreed between Burberry and the Business Associate) will, at the expense of Burberry or the Business Associate as mutually agreed: (a) support the Child Worker in returning to education and through a monthly stipend until legal working age and (b) take measures to ensure that the Child Worker and their family suffers no hardship as a result;
- If appropriate, the Business Associate and Burberry will work with the local NGO to ensure continuous support and communication with the Child Worker and family until legal working age;

- Upon reaching the relevant legal working age, the Business Associate should give the Child Worker priority to be re-hired by the Business Associate or a member of its group should the Child Worker wish;
- Burberry will support the Business Associate in a review of its hiring practices to prevent employment of Child Workers reoccurring;
- In addition to Burberry's other rights and remedies, Burberry may in its sole discretion take action in respect of Business Associates that do not demonstrate sufficient commitment to the remediation plan. This action may include terminating Burberry's business relationship(s) with the Business Associate or requiring that the relevant Business Associate is no longer used by other Business Associates in any part of the supply of products or services to Burberry; and
- Burberry may alert other organisations working with the same Business Associate, so that a collaborative approach can be employed.
- For further information, please see Burberry's Partner Non-Compliance Policy: <https://www.burberryplc.com/en/responsibility/policies/people/partner-non-compliance-policy.html>

3.3 If a Young Worker is found to be employed at night or in Hazardous Conditions, the Business Associate must remove that Young Worker from that environment. The Business Associate must continue to employ the Young Worker in a role which does not involve night working or Hazardous Conditions without any change to their remuneration or benefits. A risk assessment must be carried out by the Business Associate to identify a suitable role for the Young Worker.

4. Monitoring

4.1 Agreement to Burberry's Responsible Business Principles including this Child Labour and Young Worker Policy is required before a factory and/or any Business Associate workforce is approved to manufacture on behalf of Burberry.

4.2 Compliance with this Child Labour and Young Worker Policy is monitored by Burberry, including through announced or unannounced audits by or on behalf of Burberry.

4.3 Burberry will engage with all Business Associates (including all supply chain partners) to ensure that all such Business Associates have appropriate age verification processes in place.