

BURBERRY HUMAN RIGHTS POLICY

OUR COMMITMENT

Burberry believes that to be a great brand, we must be a great company. Burberry's culture underpins the brand and business internally and externally and creates a vibrant global community connected through shared values and purpose.

We are committed to respecting and safeguarding the human rights of all those lives that Burberry touches. We recognise that our people are our greatest assets and therefore strive to attract talent, provide employee development, recognise performance, ensure a safe working environment and promote employee health and wellbeing. Burberry is also committed to inspiring sustainable action to make meaningful and lasting improvements to workers' employment and workplace conditions. Finally, Burberry places the highest importance on customer safety, welfare and respect, whether that be through their enjoyment of Burberry products or through their engagement experience with the Company in our stores or otherwise.

The Human Rights Policy details the procedures the Company has put in place to protect and uphold human rights in this context, including the mechanisms to address potential infringement that may arise in connection with the Company's operations and activities.

Burberry is committed to upholding the International Bill of Human Rights through a policy aligned to the core Conventions of the International Labour Organisation and steered by the UN Guiding Principles on Business and Human Rights. Burberry is also a signatory of the UN Global Compact and a member of the Ethical Trading Initiative.

HOW DOES BURBERRY IMPACT HUMAN RIGHTS?

To identify the principal human rights risks that might arise during its business activities, Burberry conducted a review of all its operations and activities (whether direct or indirect) and the impact they may have on human rights. This is known as a Human Rights Materiality Analysis. Burberry identified the human rights of four stakeholder groups to be where Burberry's principle duties lie:

Our People

Supply chain workers

Communities impacted by Burberry operations

Burberry customers

Through the implementation of policies and tools, such as the Ethical Trading Programme in our global supply chain, we are aware that human rights risks may be disproportionately found within groups of vulnerable workforces. We subsequently developed tailored policies to address the rights and needs of our supply chain workers, including migrant and homebased workers. In addition, we have equal opportunity and anti-harassment policies in place.

BURBERRY HUMAN RIGHTS STANDARDS

Core standards

1. Burberry and its operations will take all necessary steps to respect the human rights of those referenced in this scope by establishing and embedding relevant policies and tools.
2. Burberry will take the necessary steps to respect human rights through the effective and consistent implementation of the Burberry policies and tools.
3. Burberry will put in place grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continued learning, and based on engagement and dialogue, in order that human rights violations can be identified, addressed and remedied wherever they may occur.
4. All grievance mechanisms will be tested against the above standard.
5. Burberry will educate our people on human rights and support them in their efforts to comply with the Policy.
6. Burberry will engage where relevant in multi-stakeholder dialogue on the issue of human rights.

Reporting and assessment

7. Burberry will continue to conduct on-going analysis of human rights impacts, e.g. through the implementation of the Burberry Ethical Trading Code of Conduct through the Ethical Trading Programme.
8. Burberry will conduct at least two yearly reviews of the Human Rights Materiality Analysis, to ensure the approach is relevant, effective and addresses human rights violations.
9. Burberry will develop approaches to measure the effectiveness of the Policy.
10. Burberry will annually monitor and report Burberry's compliance with the above standards through the company's governance structure.

HOW WILL BURBERRY ACHIEVE THEIR COMMITMENT TO HUMAN RIGHTS?

Through the Human Rights Materiality Analysis, it was found that to uphold human rights Burberry needed firstly robust operating *policies and tools* in place, secondly consistent *implementation and adherence* and finally *grievance mechanisms* to remedy and prevent further human rights infringements. Together these mechanisms represent the system Burberry has in place to uphold human rights.

1) POLICIES AND TOOLS

Burberry has the following operational policies and tools in place to protect the human rights of the four stakeholder groups identified above:

<i>To protect our people</i>	<i>To protect the supply chain</i>	<i>To protect communities</i>	<i>To protect customers</i>
Code of Ethical Business Principles	Ethical Trading Code of Conduct	Ethical Trading Code of Conduct	Customer Welfare Incident Policy
Anti-bribery and Anti-corruption Policy	Migrant Worker Policy	Migrant Worker Policy	Burberry Customer Experience training for Burberry employees
Equal Opportunities and Anti-harassment Policy	Partner Non-Compliance Policy	Homeworker Policy	Product safety policies and appropriate product labeling

Global Policy Statements and ways of working	Anti-bribery and Anti-Corruption Policy	Global Environmental Policy	Global Health and Safety Policy
Global Health and Safety Policy	Homeworker Policy	Responsible Sourcing Policy	Equal Opportunities and Anti-harassment Policy for store staff
Grievance Procedures and Disciplinary Policy	NGO-run, confidential worker hotlines ¹	Community Investment and Local Stakeholder Engagement Policies	Grievance Procedures and Disciplinary Policy for store staff
Burberry Confidential ²	Burberry Confidential (for vendors)	Traceability systems	Customer Services

¹ Hotlines are provided and staffed by independent non-profit third party providers. Workers can contact the hotlines using phone, Skype or QQ (free instant messaging). Hotlines are used to communicate grievances, as a counselling line, and for seeking advice on labour rights. The Burberry approved contracted hotline service provider directly trains workers onsite at factories in how to use the hotline.

² Burberry Confidential is a helpline and web service managed by an independent company called 'InTouch', allowing employees and the supply chain to report, anonymously, any concerns relating to malpractice, with all cases treated in the strictest confidence.

2) IMPLEMENTATION

The implementation of policies and tools should be reinforced by continual training as well as effective disciplinary procedures.

Our People

The human rights of our people are protected through the globally located Human Resources and Health and Safety departments, who follow and implement the policies above.

Policies are kept centrally and can be requested at any time. All employees will be trained in the Human Rights Policy and all departments and individuals will be supported in their efforts to comply with the Policy.

Supply chain and communities

Burberry requires all suppliers to sign up to comply with the Burberry Ethical Trading Code of Conduct, which includes, amongst other things, a requirement to provide safe working conditions, not discriminate workers on any grounds, right to freedom of association and right to regular employment.

The Burberry Responsibility team, in partnership with commercial teams, are responsible for the implementation of the Burberry Ethical Trading Code of Conduct through the Ethical Trading Programme, in place to ensure that human rights in the supply chain are respected. Burberry recognises this responsibility globally and especially in locations where human rights, labour and environmental standards are absent, weak, or poorly enforced. Burberry also acknowledges and respects different national cultures, with their own laws, norms and traditions.

The Code of Conduct applies throughout the supply chain to raw material level (e.g. farm level) and Burberry continues to map its supply chains more deeply to address, amongst other things, any human rights risks further down the supply chain.

Customers

Customers interact with several Burberry departments, both directly and indirectly. Burberry staff are trained to protect customer safety and welfare and to support customers with product aftercare in a professional manner. Teams responsible for product safety follow strict and embedded company policies.

3) GRIEVANCE MECHANISMS

Grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continue learning, and based on engagement and dialogue.

Grievance mechanisms are also used to both inform and implement future policy, to ensure developments are relevant and appropriate and that human rights violations are not replicated nor deteriorate.

Our People

Our people are entitled to seek remedy in the case of perceived infringements of their human rights.

Burberry has a written Grievance Procedure in place, should any of our employees require formal remedy and our people are entitled to the right and freedom of union membership and the right to collective bargaining.

In addition, a confidential helpline “Burberry Confidential” is available to our employees. This is communicated on joining Burberry, as part of a comprehensive onboarding programme, and details are on all employee identity cards.

Any grievances made are logged and processed, with outcomes formally recorded.

Supply chain and communities

Through its Ethical Trading Programme, Burberry upholds the rights for all workers in the supply chain to freely join a trade union. Burberry also requires factories to provide a grievance mechanism that is communicated to, understood by and applied fairly to their employees. This is verified by the activities of the Ethical Trading Programme.

In countries where grievance systems, such as independent trade unions or collective bargaining, are not permitted or supported, or in the case where vulnerable workers may not have access to effective systems of recourse, Burberry sponsors a confidential worker hotline.

In addition, Burberry Confidential is extended to our supply chain, enabling supply chain workers to report, anonymously, any concerns relating to malpractice, with all cases treated in the strictest confidence.

Any grievances made through Burberry sponsored systems are logged and processed, with outcomes formally recorded. Through our Ethical Trading Code of Conduct we work with our suppliers to support them in ensuring their grievance mechanisms are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continue learning, and based on engagement and dialogue.

Customers

Customers can report any issue regarding product or customer experience to our global, 24-hours customer service team.

Any grievances made are logged and processed, with outcomes formally recorded.

4) HOW DOES THIS WORK IN PRACTICE?

	Our People	Supply chain and communities	Customers
Potential human rights violation	A Burberry employee feels he/she is being discriminated against	Workers in the supply chain feel discriminated against	A customer faces discrimination in store by retail staff
Applicable policies and tools	Equal Opportunities and Anti-harassment Policy Disciplinary Policy Burberry Confidential	Ethical Trading Code of Conduct (no-discrimination standard) Partner Non-Compliance Policy, applied as last resort to non-complying factories Migrant Worker Policy	Customer Welfare Incident Policy Disciplinary Policy
Implementation	All workers are trained on the above policies and steps are clearly communicated and made available	All factories commit to compliance to the Ethical Trading Code of Conduct, monitored through Ethical Trading Programme	Regular training to store staff (including sales associates and security teams) of policies and processes
Grievance mechanism	Burberry Grievance Procedure	Internal factory grievance systems Ethical Trading Programme (interview during audits) Non-profit Confidential worker hotline	Customer Services

RESPONSIBILITIES AND REVIEW

Overall responsibility for this Policy resides with the Chief Executive Officer Marco Gobetti.

The implementation of Human and Labour Rights is overseen by the Chief People and Corporate Affairs Officer, who has operational responsibility for Human and Labour Rights and reports into the CEO and the Board.

Burberry will regularly solicit stakeholder input on the application of our policies through our membership of the tri-partite ETI and through additional multi-stakeholder dialogue on a case by case basis.

Burberry is also advised every 6 months by the External Advisory Committee.

The Human Rights Policy sets out Burberry's commitment to respect and safeguard the Human Rights of its extended global community including our people, those in our supply chain and communities and our customers.

The Human Rights Policy sets out the procedures the Company has put in place today to protect and uphold human rights. However, we remain vigilant, informed and will regularly review any new forms of best practice to be included in this Policy.

ANNEX 1

SCOPE AND STANDARDS OF REPORTING

The Policy covers our people working in all locations in which Burberry operates, including manufacturing facilities, offices and retail locations as well as extending to cover the supply chain and our online and in-store customers. The Policy sets out the Human Rights standards that Burberry strives to adhere to, as well as the mechanisms for remedy when such policies are not upheld and, as a consequence, human rights are not respected.

All Burberry entities and supply chain partners are expected to comply with all applicable laws and Human Rights standards included in this Policy.

DEFINITIONS

“**Human Rights**” are defined as all those rights set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the Core Conventions of the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

“**Our people**” is defined as people directly employed by Burberry either permanently or for a fixed term, people engaged on a contractor, agency worker or freelance basis, or otherwise working on Burberry premises.

“**Supply chain**” is defined as local and international organisations and those involved in the production of Burberry goods at all stages of manufacture.

All references to “**operations**” include Burberry’s wholly or partially owned entities.

Any reference to “**communities**” applies to those individuals and communities who are either directly or indirectly impacted by their relationship with Burberry operations or supply chain.