

BURBERRY ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**POLICY OBJECTIVES**

The UK Bribery Act is intended to support international efforts to combat bribery, corruption and facilitation payments. The Act applies to all UK companies wherever they operate in the world. This includes Burberry and extends to all Burberry business partners who are referred to as “Burberry Business Associates”. Failure to comply with the Bribery 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 Corruption Policy (“Policy”) which sets out Burberry’s position on bribery, corruption and facilitation payments. The Policy applies to all Burberry employees, contractors and Burberry Business Associates as defined in the Burberry Responsible Business Principles.

Business Associates are expected to comply with the 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. Business Associates are asked to familiarise themselves with the terms of the Policy as set out below. Business Associates shall immediately report any suspected acts of bribery, corruption or other breach of the Policy to Burberry’s General Counsel.

Where a breach of the 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 the 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. 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 Burberry's Policy. Companies and individuals can be prosecuted by regulators in the UK for engaging in these activities.

2. YOUR OBLIGATIONS AS A BUSINESS ASSOCIATE

Burberry may be held responsible if its 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 Business Associates including between Business Associates and other third parties must be conducted in accordance with the Policy.

Prohibited Activities

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

Engaging Third Parties To Carry Out Burberry Business

As the Act extends to activities between Burberry 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 the 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

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, Business Associates must be guided by the highest ethical standards when deciding whether giving or receiving gifts or hospitality is appropriate.

In particular, Business Associates must always ensure that any such exchanges are transparent, proportionate, reasonable and bona fide. ***If the 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 Business Associate, or another party, under an ***obligation***, or would it feel under an ***obligation***?
- Is the gift or entertainment ***unlawful*** in the 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 Business Associate be ***embarrassed*** if Burberry or anyone else was aware of it?

- Would the 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. 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).