

**BURBERRY**

**LONDON ENGLAND**

**CODE OF CONDUCT 2022**

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## FOREWORD



At Burberry, we are guided by our belief that creativity opens spaces.

Our purpose is to unlock the power of imagination to push boundaries and open new possibilities for our people, our customers and our communities. Being creatively driven, forward thinking, open and caring, and proud of our heritage are hallmarks of our organisation at its best. These values have remained core to our brand since Thomas Burberry founded the company in 1856.

We are committed to doing well by doing right by all our stakeholders. We want our people to feel proud to work at Burberry. We foster an open and inclusive culture so that creativity can thrive and we hold ourselves and each other to the highest standards of behaviour.

We strive to make a positive difference to the communities around us and we always act with integrity and respect, following all local laws and regulations in the countries where we operate.

This Code is our guide to operating responsibly. It outlines the key policies, processes and behaviours we expect everyone working for or with Burberry to adhere to, including our commitment to our planet, our communities and each other.

These commitments underpin the strong, enduring relationships we have with all our stakeholders and will ensure Burberry continues to flourish for generations to come.

**JONATHAN AKEROYD**  
CHIEF EXECUTIVE OFFICER



## OUR PURPOSE

### CREATIVITY OPENS SPACES

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

Creativity has always fuelled 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 so we can push boundaries and explore new possibilities. Our purpose underpins the choices we make at Burberry and informs our long-term goals.

## OUR VALUES

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

### CREATIVELY DRIVEN

At our best, we underpin creativity with rigour.

### OPEN AND CARING

We uphold a legacy of respect and inclusivity, guided by our conscience.

### PROUD OF OUR HERITAGE

We combine a strong sense of our roots with a desire to learn from the world.

### FORWARD-THINKING

We challenge ourselves to keep exploring what's next.

To help our colleagues live our values, we have articulated leadership standards for line managers and team members across our business. These standards translate our values into tangible, measurable actions that connect to driving performance and set out what is expected of everyone at Burberry.

## OUR CODE

This document outlines the key policies, processes and behaviours we expect our colleagues and partners to adhere to, while following all local laws and regulations. It serves as a guide to ensure we fully live our values, make the best choices and continue to act in accordance with our purpose, values and leadership standards so that Burberry will continue to flourish for generations to come.

Adherence to the Code, including the policies and processes outlined in the Code, is a condition of working at or with Burberry, whoever and wherever you are. It applies to all permanent and temporary colleagues and 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 the Code.

The Code covers five areas: our colleagues, operating responsibly, our brand, our communities and our planet. Where the 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.

Our leadership team and line managers are responsible for promoting adherence to the Code through appropriate communication, training and modelling behaviours.

If a colleague or person engaged by Burberry becomes aware that an individual is not following the Code, including the intended spirit of its contents, they should report that individual to their line manager or HR representative. They can also visit [Burberry Confidential](#), our global confidential helpline.

Failure to adhere to the 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. Compliance with the Code is additional to any legal or regulatory requirements.

All colleagues are expected to complete the Code of Conduct training modules on an annual basis to ensure they continue to stay up-to-date with our latest policies and processes.

For further information about the Code, colleagues should contact their line manager or, if preferred, email any questions or comments to [Co.Sec@burberry.com](mailto:Co.Sec@burberry.com).

## BURBERRY CONFIDENTIAL

As an open and caring employer committed to fostering a culture where everyone has a voice, we encourage all colleagues to feel comfortable speaking up and asking for help when needed. We provide access to Burberry Confidential, a global confidential helpline, in countries where we are present, and where it is legally permitted. All calls and emails are logged and independently reviewed and followed up.

Where anyone has concerns about the practices of colleagues, managers, contractors or subcontractors or Burberry as a whole, then, in the first instance, they should consider reporting this through their line manager, Asset and Profit Protection (APP) or by approaching their HR representative. If a colleague does not feel comfortable raising concerns in one of these ways, then Burberry Confidential, a service managed by an independent company, can be used to provide information in a confidential manner.

Colleagues should refer to the [Burberry Confidential Policy](#), available on Burberry World for full details of what can be reported using the service and where it can be accessed.

Concerns can be raised in the following ways:

- via the relevant third-party website, details of which can be found on Burberry World;
  - via the SpeakingUp App, which is available to download via Burberry Apps, as well as the Apple App Store, Google Play and Windows Store. The access code is available in the Burberry Confidential Policy;
- or

- by phone. Colleagues can leave a recorded voice message in their local language by calling a country-specific telephone number. The telephone numbers are listed in the Burberry Confidential Policy available to colleagues on Burberry World.

If colleagues and contractors have any grievances, these should be processed in accordance with the applicable Burberry grievance procedures. Examples of concerns to report through the Burberry Confidential mechanisms include:

- suspected criminal offences (e.g. fraud or misappropriation of designs/data/other assets)
- unauthorised disclosure of confidential information, know-how or trade secrets
- anti-competitive practices (e.g. agreements or exchanges of information on pricing between competitors, such as during tender processes, market-sharing agreements between competitors)
- failure to comply with any legal obligation
- breach of our Anti-Bribery and Anti-Corruption Policy (including our gifts and hospitality policy)
- financial mismanagement (e.g. the manipulation of financial records)
- danger to the environment or to health or safety
- breach of internal policies and procedures
- behaviour which might reasonably be expected to damage Burberry's reputation



## OUR PEOPLE

We offer all colleagues space to express their creativity and opportunities to develop personally and professionally. We have codified key behaviours and standards aligned to our values, so they are truly embedded across the organisation.

We believe diversity, equity and inclusion are essential to fulfilling our purpose and living by our values as well. Attracting and retaining diverse talent and fostering an inclusive culture enables us to be more creative in everything we do and open spaces for our colleagues and communities.

We take a holistic approach to supporting our colleagues by offering a variety of resources that reinforce their physical, financial, emotional, social and overall wellbeing.

This section includes policies on diversity and inclusion, health and safety, as well as our approaches to wellbeing and ways we can all contribute to fostering an open and inclusive environment.



## FOSTERING 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 and Inclusion Policy, which sets a global standard for how we can foster an inclusive environment that encourages diverse capabilities, skillsets and mindful allies. Central to our inclusive culture is our zero tolerance for discrimination in any form. 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 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. All colleagues are required to complete unconscious bias training and allyship training is being rolled out across the organisation.

We are committed to supporting our colleagues throughout their careers with Burberry. As part of this, we have an industry-leading [Global Parental Leave Policy](#), offering all 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 champion voices across our organisation through our Internal Diversity and Inclusion Council, made up of colleagues from across regions and functions. Participation in the selection process to become part of the group is open to all colleagues. The Council raises emerging issues and challenges, explores solutions, and acts a sounding board for Burberry on our diversity and inclusion journey.

**READ THE GLOBAL DIVERSITY AND INCLUSION POLICY [HERE](#).**

**YOU CAN LEARN MORE ABOUT BURBERRY'S APPROACH TO DIVERSITY, EQUITY AND INCLUSION [HERE](#).**

**YOU CAN CONNECT WITH THE COUNCIL DIRECTLY BY EMAILING [DANDI@BURBERRY.COM](mailto:DANDI@BURBERRY.COM).**



## BENEFITS

We offer colleagues a number of benefits at Burberry, including healthcare, awards for continuous service, third-party discounts and offers, and discounted rates on select Burberry items.

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.

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.**

**IF YOU HAVE ANY QUESTIONS ABOUT YOUR BENEFITS AT BURBERRY, PLEASE ASK YOUR LINE MANAGER OR HR REPRESENTATIVE.**

## WELLBEING

We recognise the importance of creating an environment where colleagues and partners can bring their best selves to work, share how they feel and speak openly about their own health and wellbeing. This enables them to create spaces in their lives to care for themselves and each other.

We ensure our wellbeing priorities are closely linked with our diversity and inclusion agenda, so we are mindful of everyone's needs across Burberry. Our dedicated wellbeing space for colleagues on Burberry World hosts online information, tools and interactive resources to help support the mental and physical health of our colleagues. This includes access to free, confidential counselling through our Employee Assistance Programme.

All colleagues play a role in creating an open and inclusive culture by actively supporting and prioritising one another's wellbeing.

**YOU CAN LEARN MORE ABOUT BURBERRY'S APPROACH TO WELLBEING AND ACCESS RESOURCES HERE.**

**IF YOU HAVE ANY CONCERNS, PLEASE ESCALATE THIS VIA BURBERRY CONFIDENTIAL, YOUR LINE MANAGER OR THE HR TEAM.**

## 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. We therefore expect anyone working for or with Burberry to maintain the highest health and safety standards and to 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 POLICY [HERE](#).**

## FURTHER INFORMATION

More information on our processes and policies regarding colleagues can be found on Burberry World.

### IF YOU NEED MORE HELP

Please contact either your line manager or Ask HR for further advice and information.

### QUICK LINKS

[Global Diversity and Inclusion Policy](#)

[Global Parental Leave Policy](#)

[Global Health and Safety Policy](#)





## OPERATING RESPONSIBLY

We are committed to fostering an open culture underpinned by high standards of behaviour and accountability in line with our values.

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, including our information, data security, product, tax and anti-bribery, corruption and fraud policies, which comply with all applicable laws and regulations.



## 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.

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD. IF YOU HAVE ANY QUESTIONS REGARDING DATA PROTECTION POLICIES, PLEASE CONTACT [DPO@BURBERRY.COM](mailto:DPO@BURBERRY.COM).**

## THE PROTECTION AND USE OF BURBERRY ASSETS

Access to Burberry information and information systems is provided for business purposes to ensure we stay connected as one global team.

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 software, 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 Information Security Policy and Data Classification Management Policy. Confidential information must not be used for personal gain.

**READ THE POLICIES [HERE](#). YOU ARE REQUIRED TO PARTICIPATE IN BURBERRY'S ANNUAL MANDATORY INFORMATION SECURITY TRAINING.**

## PRODUCT RECALL AND WITHDRAWAL

In crafting luxury products that inspire and excite our customers, 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.

In the event that we fall short of these standards, product issues are fully investigated and managed cross-functionally across the organisation.

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 via Burberry's Quality Assessment Form and submitted to the relevant contact specified on that form.

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

**[MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.](#)**

## **INSIDE INFORMATION AND DEALING IN BURBERRY SHARES**

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.

**YOU MUST ENSURE YOU READ AND UNDERSTAND BURBERRY’S SHARE DEALING CODE.**

**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 Conflict 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 conflict 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 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 to arise.

**MORE INFORMATION IS AVAILABLE ON  
BURBERRY WORLD.**

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

## GLOBAL TAX STRATEGY

Our tax strategy applies across our global operations and covers the following areas: governance, compliance, tax planning, dealings with tax authorities and tax risk management. We do not use tax structures or undertake artificial transactions where the sole purpose is to create a tax advantage. Our tax processes, policies and governance procedures are designed to identify and mitigate material tax risks, ensure adherence to tax policy and apply consistent standards of tax compliance. Our Global Tax Policy is in place to assist our colleagues in helping Burberry comply with its various tax obligations.

**READ THE POLICY [HERE](#).**

## PREVENTING TAX EVASION OR THE FACILITATION OF TAX EVASION

We prohibit any form of tax evasion. Our Criminal Finances Policy mandates that Burberry does not at any time engage in tax evasion or in activities that facilitate tax evasion by colleagues or third parties, and only engages with businesses and people who comply with their tax obligations. 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.

In addition, all retail colleagues are expected to 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. Colleagues need to ensure they are aware of these policies and abide by them at all times.

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.**

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

## PREVENTING 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 Corruption Policy and our Fraud Risk Management Framework.

We take all reasonable steps to prevent fraud, bribery and corruption across our operations. All colleagues and third parties associated with Burberry are expected to 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.

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 Corruption, Gifts and Hospitality, Market Abuse Regulations, prevention of tax evasion 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 AN OVERVIEW [HERE](#).**

**[MORE INFORMATION ON THESE POLICIES IS AVAILABLE ON BURBERRY WORLD.](#)**

**YOU MUST PARTICIPATE IN BURBERRY'S ANNUAL MANDATORY TRAINING, TOGETHER WITH ADDITIONAL TARGETED TRAINING FOR CERTAIN FUNCTIONS, FOR AREAS SUCH AS 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.**

## COMPETITION AND ANTI-TRUST LAW COMPLIANCE

We are dedicated to compliance with all competition and anti-trust laws wherever the same apply to its 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.

**MORE INFORMATION IS AVAILABLE ON BURBERRY  
WORLD.**

## FURTHER INFORMATION

More information on our processes and policies regarding operating responsibly can be found on Burberry World.

### IF YOU NEED MORE HELP

Please contact either your line manager or Ask HR for further advice and information.

### QUICK LINKS

[Data Protection Policies](#)

[IT Acceptable Use Policy](#)

[Information Security Policies](#)

[Product Recall and Withdrawal Policy](#)

[Share Dealing Code](#)

[Global Tax Policy](#)

[Criminal Finances Policy](#)

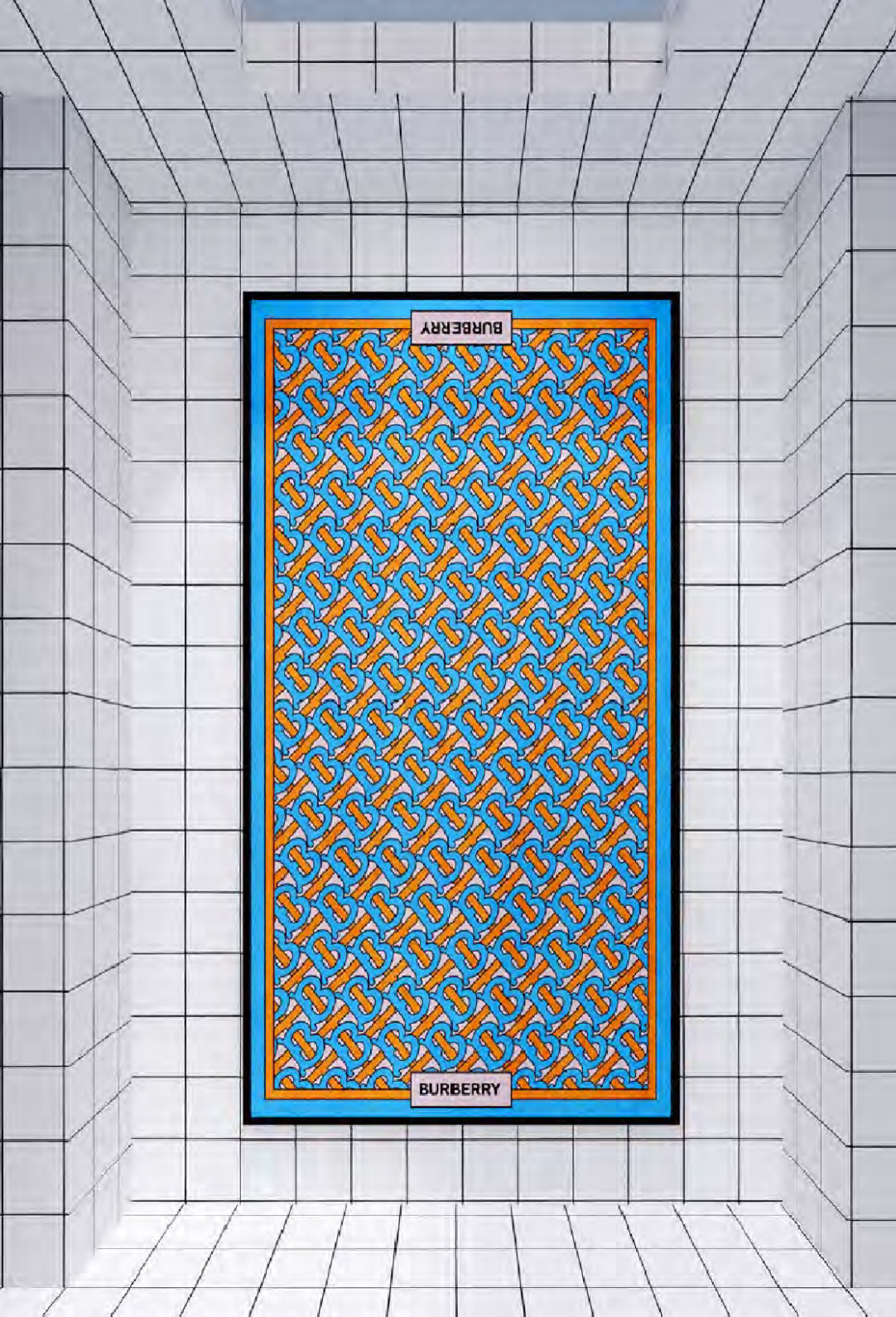
[Cash Acceptance Policies](#)

[Anti-Bribery and Corruption Policy](#)

[Fraud Risk Management Framework](#)







## PROTECTING OUR BRAND

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

We amplify our voice through partnerships and collaborations, while offering our brand as a platform to support our communities. In addition to inspiring and exciting our customers, we place the highest importance on their safety and welfare wherever they interact with our brand.

This section includes a range of processes and measures around the safeguarding of our brand, how we prioritise our customers and how we continue to innovate across our marketing and external presence.

## PUTTING CUSTOMERS FIRST

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 physically by both dedicated Retail Excellence teams and management to ensure product knowledge and ways of working are always up to date and consistent across all regions and channels. All retail colleagues must abide by policies detailed in Burberry's Store Manual, which includes key information on areas such as store standards, compliance, client engagement and payments.

**YOU MUST ENSURE YOU READ AND UNDERSTAND ALL POLICIES, PROCESSES AND GUIDELINES IN THE STORE MANUAL.**

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.**

## BRAND PROTECTION

We are proud of our heritage and we seek to protect our brand name and reputation in all aspects of our business operations. Our Brand Protection Policy, which all colleagues and contractors must abide by, is supplemented by processes regarding Product Authentication and the Reporting of Counterfeit Merchandise.

Burberry's Brand Protection team is responsible for brand protection efforts globally, both online and offline, and works to mitigate risks to our rights and reputation. Part of the team's remit is to ensure that Burberry has the ability to sell products in the markets it chooses free from external influence, without damaging our image and reputation. Its efforts also include protecting consumers from harmful counterfeit products and protecting our intellectual property rights. In addition, the team ensures due respect is given to the intellectual property rights of others.

It is important that all colleagues take infringement matters seriously. If you discover products which you believe may infringe Burberry's rights, please complete a sighting report through Burberry World and escalate the matter to the Brand Protection team immediately.

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.**



## EXTERNAL COMMUNICATIONS AND SOCIAL MEDIA

We are respectful and supportive of our communities in our communications, and we prohibit the publication of anything which is inaccurate or offensive in any way. Our Social Media teams operate with stringent processes to guide approval for creating imagery and subsequent posting on digital platforms, from campaign content to live content from events, such as our runway shows.

All colleagues are required to follow our Social Media Guidelines, which detail key information on content sharing from individual accounts. They provide guidance for how we can all remain true to our values and protect our brand, while using our voice to promote and share our exciting activities. This includes a checklist of key considerations colleagues must make before posting anything. We encourage everyone at Burberry to engage with our published content on social media by liking, commenting or sharing posts that inspire them.

Colleagues are not permitted to share any confidential information regarding Burberry on any social channels, including unannounced product launches, campaigns, assets, financial information or customer details. There is zero tolerance of any posts that could be offensive or discriminatory. All colleagues are individually responsible and may be legally liable for any content posted online. Any breach of these guidelines could result in disciplinary action, including summary dismissal.

We provide our stakeholders with clear and accurate information about our products and timely, factual news about company developments to ensure they are kept up to date on Burberry's activities. Any external statement remains confidential until publication and any imagery is subject to a rigorous sign-off process to ensure we observe and comply with usage rights.

Any colleague or partner speaking on behalf of Burberry must seek prior approval to do so and any content they use is subject to approval from the Corporate Relations team.

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.**

## FURTHER INFORMATION

More information on our brand protection processes and policies can be found on Burberry World.

### IF YOU NEED MORE HELP

Please contact either your line manager or Ask HR for further advice and information.

### QUICK LINKS

[Brand Protection Policy](#)

[Social Media Guidelines](#)







## OUR COMMUNITIES

Thomas Burberry personified our purpose. He saw open spaces waiting to be explored and used his creativity to open them. Thomas was a passionate advocate for social reform and supporting local communities. He embraced his own passions and, by doing so, inspired others to ignite theirs.

We continue his legacy today. We are committed to respecting the communities and environments in which we operate and meaningfully supporting those in need. Helping others and engaging in initiatives that make a positive impact are central to our culture.

This section focuses on how we live by these values and spans our policies and approach to community investment, volunteering, human rights, protecting people across our supply chain and trade compliance.

## CHARITABLE DONATIONS

Burberry donates a percentage of its adjusted Group profit before tax to charitable initiatives around the world, continuing Thomas Burberry's legacy of philanthropy and community support. All sponsorship or partnership initiatives and charitable organisations supported by Burberry must be aligned with our values. The decision-making process in identifying these organisations must be transparent and is overseen by the Ethics Committee.

Colleagues must register any proposed sponsorship or partnership initiatives with charitable organisations on Burberry World for internal review and approval by the Responsibility team. Organisations must:

- be well-established, with a good reputation and a track record of delivering community benefit;
- not discriminate against users of their services based on race, religion or beliefs;
- not be affiliated with a political movement; and
- be registered with a local charity commission (where applicable).

In addition, our in-kind donations include one-off gifts of non-trademark fabric and materials to selected charities and social enterprises, which support employability programmes for underrepresented people in our industry.

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.**

## RESPONSIBLE BUSINESS PRINCIPLES AND ETHICAL TRADING

To ensure we uphold the highest standards in how we operate as a business, 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 include adherence to our Ethical Trading Code of Conduct, which outlines our position on fair treatment of colleagues across the supply chain, upholding human rights and maintaining good working conditions. We have zero tolerance for any violation of these principles.

All colleagues working with supply chain 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 THE POLICIES [HERE](#).**

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.**

## PROTECTING HUMAN RIGHTS

We strongly 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, including finished goods vendors, raw material suppliers, non-stock suppliers, construction contractors, licensees and franchisees, are compliant with the procedures set out in the policy and monitor labour conditions throughout the extended supply chain.

**READ THE POLICY [HERE](#).**

## PROTECTING 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 POLICY [HERE](#).**

## TRADE COMPLIANCE AND CONTROLS

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. We expect all colleagues to 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.

**MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD. ALL COLLEAGUES MUST COMPLETE ALL RELEVANT TRAINING AND KEEP UP TO DATE WITH THE LATEST REGULATIONS AT ALL TIMES.**

## PREVENTING 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 POLICY [HERE](#).**

## SAFEGUARDING 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 expectations. 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. Burberry reviews the Model Wellbeing Policy alongside industry guidelines on an annual basis.

**READ THE POLICY [HERE](#).**

## ENGAGING LOCAL STAKEHOLDERS

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 THE POLICY [HERE](#).**



## PARTNER COMPLIANCE

We expect all partners to uphold our values. We do not tolerate any non-compliance with our policies. Through our Partner Non-Compliance Policy, which is applicable to all partners involved in the manufacturing of Burberry-branded goods, we ensure adherence to Burberry's Responsible Business Principles and, where relevant, any Letter of Undertaking or other agreement or arrangement. The policy is also designed to give all parties involved a reasonable amount of time to rectify any issues, which may have been identified as part of an Ethical Trade audit, and to minimise any potential and/or detrimental impact to workers' livelihoods.

All colleagues working with supply chain partners have a responsibility to ensure this policy is clearly understood and that our supply chain partners adhere to it. In cases of non-compliance, it is the responsibility of colleagues to support the supply chain partner to remedy any issues identified.

**READ THE POLICY [HERE](#).**

## FUNDRAISING AND VOLUNTEERING

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

### **MATCH FUNDING**

Burberry matches funds raised by any team fundraising activity up 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. All charitable causes must be aligned with Burberry's values and charity recipients must be registered or have non-profit status.

### **VOLUNTEERING DAYS**

We create space for all colleagues 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 long-term partners or a charity of their choice.

Up-to-date information on local volunteering opportunities, fundraising and community support is shared via the Our Communities network on Yammer.

**YOU MUST HAVE PRIOR APPROVAL FROM YOUR LINE MANAGER AND THE RESPONSIBILITY TEAM IN LINE WITH THE VOLUNTEERING AND MATCH FUNDING GUIDELINES. [FIND MORE INFORMATION ON BURBERRY WORLD](#).**

## FURTHER INFORMATION

More information on our community programmes and policies can be found on Burberry World.

### IF YOU NEED MORE HELP

Please contact either your line manager or Ask HR for further advice and information.

### QUICK LINKS

[Ethical Trading Code of Conduct](#)

[Human Rights Policy](#)

[Migrant Worker Policy](#)

[Child Labour and Young Worker Policy](#)

[Model Wellbeing Policy](#)

[Local Stakeholder Engagement Policy](#)

[Partner Non-Compliance Policy](#)





## OUR ENVIRONMENT

As we seek to transform our industry, we are actively working to reduce our environmental footprint and meaningfully support our global communities. Drawing on our heritage of exploration and guided by our purpose – our shared belief that through creativity we can open spaces – we are pushing boundaries, setting leading standards and pioneering innovative solutions to create real system change.

This section outlines the policies and processes we expect our colleagues and partners to adhere to with respect to the environment, while following all local laws and regulations. These cover climate, sourcing, waste, water and chemicals.

## CLIMATE

Our ambition is to be net-zero by 2040 and we are on track to achieve a zero-carbon footprint in our own operational energy use by 2022. We are working towards this by reducing absolute emissions, improving energy efficiency and switching to renewable energy sources before insetting or offsetting any remaining emissions. Our science-based targets, approved by the Science Based Targets Initiative, underpin our net-zero ambition. They are:

- **TO REDUCE OUR ABSOLUTE SCOPE 1 AND 2 GREENHOUSE GAS EMISSIONS BY 95% BY 2022 FROM 2016; AND**
- **TO REDUCE OUR ABSOLUTE SCOPE 3 GREENHOUSE GAS EMISSIONS BY 30% BY 2030 FROM 2016.**

To help us reach our goals and protect our community and ecosystems, our Global Environmental Policy sets out the environmental standards we uphold across our own and extended supply chain. This policy covers the natural resources we use and how we use them. It is informed by the Paris Climate Agreement and the Rio Declaration on Environment and Development and reflects well-established UN sustainability frameworks.

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, and increase the use of renewable energy wherever possible.

**[READ THE POLICY HERE.](#)**

**[MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.](#)**



## WASTE

While continuing to let our creativity flourish, we seek to minimise waste at all stages of our value chain. 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. We never destroy 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.

**[FIND OUT MORE ABOUT OUR APPROACH TO WASTE ON BURBERRY WORLD.](#)**

## 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 process and protocols.

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.](#)**

**[MORE INFORMATION IS AVAILABLE ON BURBERRY WORLD.](#)**

## RESPONSIBLE SOURCING

We are committed to responsible and sustainable business practices across our global supply chain.

Our Responsible Sourcing Policy sets out the high standards we uphold, including with respect to animal welfare and precious materials. We do not use real fur in our products and our products are not tested on animals. 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 expected to reinforce this policy with all parties and implement adequate checks to monitor suppliers' and vendors' practices and ensure compliance.

READ THE POLICY [HERE](#).

[MORE INFORMATION IS AVAILABLE ON  
BURBERRY WORLD.](#)

## FURTHER INFORMATION

Find more information on our policies, processes and approach by visiting the Responsibility section on Burberry World.

### IF YOU NEED MORE HELP

Please contact either your line manager or Ask HR for further advice and information.

### QUICK LINKS

[Global Environmental Policy](#)

[Waste Principles](#)

[Chemical Management](#)

[Responsible Sourcing Policy](#)







## KEY CONTACTS

**IF YOU HAVE ANY QUESTIONS OR FEEDBACK ABOUT THIS DOCUMENT:**

Please submit these via email to [Co.Sec@burberry.com](mailto: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:**

All colleagues are able to do this through [Burberry Confidential](#). The details of this can be found on page 5 of this document.

## KEY POLICIES INDEX

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Brand Protection Policy (page 21)  
Burberry Confidential (page 05)  
Cash Acceptance Policies (page 16)  
Chemical Management Programme (page 33)  
Child Labour and Young Worker Policy (page 27)  
Conflict of Interest Policy (page 15)  
Criminal Finances Policy (page 16)  
Data Classification and Management Policy (page 12)  
Data Retention Policy (page 12)  
Ethical Trading Code of Conduct (page 25)  
Fraud Risk Management Framework (page 17)  
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