

BURBERRY MODERN SLAVERY STATEMENT 2024/25

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2024/25 Burberry Group Plc Statement

At Burberry, we are committed to respecting and upholding human rights wherever we operate, and we do not tolerate any form of modern-day slavery in our business or supply chain.

Modern Slavery Act 2015 (UK), Transparency in Supply Chains Act 2010 (California), Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (Canada) and Modern Slavery Act 2018 (Australia)

About this statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015, the Canada Fighting Against Forced Labour And Child Labour In Supply Chains Act 2023, the Australian Modern Slavery Act 2018, and the California Transparency in Supply Chains Act of 2010 (SB 657). It sets out the steps we have taken during the financial year 2024/25 to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business. Burberry's definition of slavery and human trafficking is aligned to section 54 (12) of the Modern Slavery Act 2015.

This statement is also made on behalf of the following subsidiaries of Burberry Group plc (company number 3458224): Burberry Limited (company number 162636), Burberry (UK) Limited (company number 4288292), Burberry International Holdings Limited (company number 4251867), Burberry Limited (registered in the State of New York under DOS ID 293943), Burberry (España) Holdings Limited (company number 5265289), Thomas Burberry Holdings Limited (company number 3509143), Burberry Haymarket Limited (company number 4868493), Burberry Holdings Limited (company number 4251948), Burberry Canada Inc (corporation number 689541-7), Burberry Pacific Pty Ltd (ACN 098 381 161), and Burberry London Limited (company number 4251951) and the actions and operations set out below are effective across the Burberry group.

During the reporting period this statement covers, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control. Burberry Limited is responsible for drafting the statement on behalf of Burberry Group PLC, with inclusions and approvals for all subsidiaries.

INTRODUCTION

As a global British luxury brand, we are committed to acting responsibly to achieve our goals.

Under the banner of our Responsibility strategy, Burberry Beyond, we set ambitions across four pillars, Product, Planet, People and Communities, that bring everything we do across our business, our supply chain and our communities together to create a better world for the next generation.

We have set targets across the four pillars to embed responsible business practices, supported by our ongoing policy commitments. We have key metrics in place to measure and report on progress.

To positively impact people within our supply chain, we collaborate with partners to protect the timeless nature of luxury craftsmanship skills and traditional techniques. Core to this agenda is respecting and upholding human rights, combatting the risk of modern slavery, and increasing transparency throughout our supply chain.

Our 10th Modern Slavery Statement provides an overview of the progress we have made in the past year to strengthen our systems to prevent modern slavery in our supply chain and operations. We are addressing risks through our compliance and social impact programmes to create meaningful impact within our own operations, our supply chain and our local communities.

In FY 2024/25, we implemented actions that focused on the key risk areas of our operations and our supply chain. These actions are based on the findings from both our most recent human rights impact assessment (HRIA) and ethical trading programmes activities, including:

- Delving further into our extended supply chains and business operations to identify and address new potential modern slavery risks;
- Globally aligning our Worker Wellbeing Programme, alongside implementing programme enhancements to better support our supply chain partners;
- Working with external experts such as the International Organization for Migration (IOM), a United Nations-related agency, to provide introductory awareness-raising sessions on the protection of migrant workers in our global supply chain, including responsible recruitment;
- Protecting women’s rights by integrating gender related components into our supply chain due diligence approach and Worker Wellbeing Programme with the support of external experts, Business for Social Responsibility – BSR;
- Expanding our long-standing Health Programme to new supply chain partners across the APAC region; and
- Launching a grievance mechanism for our EMEIA Tier 1 supply chain partners, which will be available to approximately 41,000 workers.

Our key areas of progress in FY 2024/25 include:

- Our Ethical Trading Programme covers all our Tier 1 supply chain and in FY 2024/25 281 of our Tier 1 suppliers, have had an on-site assessment;
- Our Vendor Ownership Programme (VOP) – which helps our VOP partners to develop their own due diligence programme across their supply chain – is now in place at 27 partners in the EMEIA region and 1 in the APAC region, covering approximately 52% of our EMEIA Tier 1 supply chain;
- Our Worker Wellbeing Programme has reached approximately 13,670 workers in our supply chain; and
- Working with external experts to ensure our human rights due diligence model continues to evolve to meet emerging changes in legislation and supporting our supply chain partners to ensure they are informed and compliant with such standards.

OUR BUSINESS & OPERATIONS

Established in 1856, Burberry is a timeless British luxury brand with a unique heritage and a longstanding commitment to quality, innovation, and creativity. We design, source, make and sell carefully crafted products and are focused on delivering growth while playing a positive role in society.

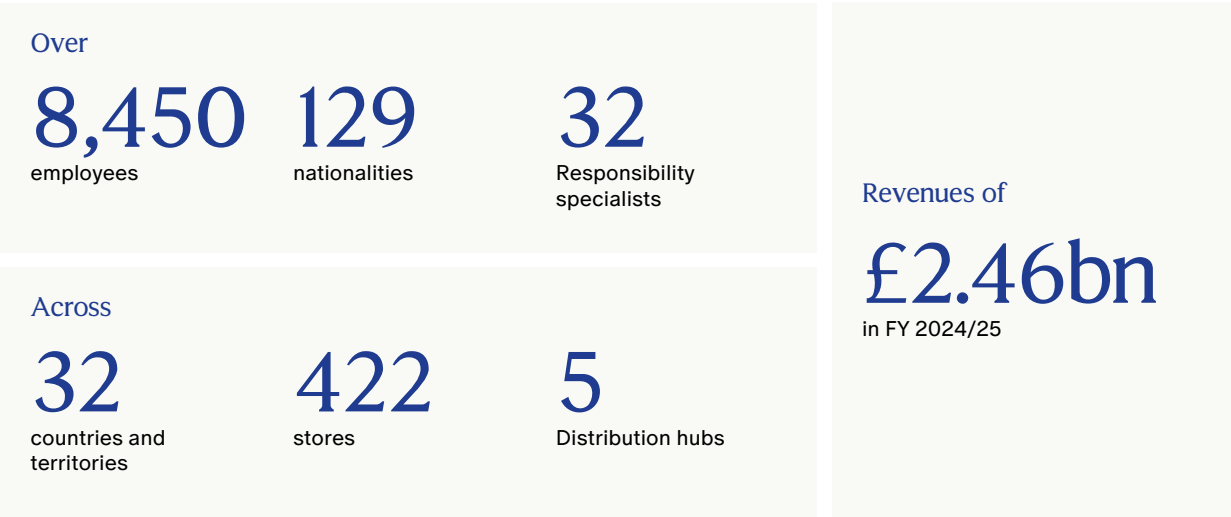
Our purpose and values are at the heart of our business decisions and the wellbeing of our people, the people in our supply chain and the communities where we operate are at the centre of all our activities.

We manufacture our products at both Burberry-owned sites in the UK and Italy, and in partnership with a network of global suppliers.

We sell our products through our network of directly operated and franchised stores, online and via wholesale partners. Benefitting from their product and distribution expertise, we work with licensing partners for certain product categories such as eyewear and beauty.

Operating across the world, we contribute to local economies and support the communities around us. We add value to societies both directly and indirectly through our business operations and by partnering with NGOs on community programmes.

At Burberry, we have:



Our product supply chain

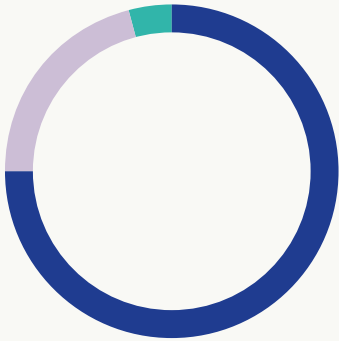
We operate two Burberry-owned manufacturing sites in the UK (in Castleford and Keighley) and two in Italy (in Florence and Turin). We also have a network of global suppliers. We have longstanding partnerships with many of our suppliers and believe that strong relationships are key to ensuring continuous improvement in supply chain working conditions.



Tier 1 suppliers – FY 2024/25 in numbers:

687

production sites



Italy	75%
Rest of Europe	21%
Asia	4%

Tier 1 suppliers – workforce profile
FY 2024/25:

Total workforce

61,495

workers

Average number of workers per facility

90

Gender split

29%

male

71%

female

Collective bargaining

About 78%

of the Tier 1 production sites, we source from are covered by national and/or industrial collective bargaining agreements



Note: Please see our [appendix](#) for definitions relating to the Tiers of our supply chain.

Traceability

Traceability is a key enabler to help us assess and manage social risks associated with raw materials sourcing. We are targeting full traceability of all key raw materials by FY 2029/30. Through our traceability programme, we will be able to assess and manage the social impacts of raw material sourcing more closely, as well as meet evolving consumer and regulatory needs.

We have implemented a successful traceability pilot project in FY 2022/23 for cotton, wool and synthetics with key suppliers, using a third-party traceability tool to track these fibres back to the country of origin. We are now scaling this initiative to include other fibre types and will continue to accelerate this work. See our [Annual Report FY 2024/25](#) for further details of our progress on raw material traceability.

Licensees

We license production of our beauty and eyewear products to Coty and Luxottica respectively. We work with both licensees to apply consistent standards which align with those adhered to across the rest of our supply chain.

Coty's Human Rights Policy sets out its commitment and approach to addressing human rights risks in its supply chain. Coty is a founding member of the Responsible Mica Initiative (RMI), a multi-stakeholder action group aiming to establish a 100% responsible Indian mica supply chain by the end of 2030. Since 2017, Coty has been a member of the Roundtable for Sustainable Palm Oil (RSPO) and is working towards the ambition for all Coty's palm oil purchases to be RSPO certified. For further details, see [Coty's Modern Slavery Statement](#).

Luxottica is part of the EssilorLuxottica Group, a global leader in the design, manufacture and distribution of ophthalmic lenses, frames and sunglasses. As part of the Eyes on Ethics pillar of its Eyes on the Planet sustainability programme, EssilorLuxottica has developed a set of ethics-related resources and tools that reflect its evolution as a unified Group as well as its values. EssilorLuxottica has several policies to address human rights and modern slavery risks, including its Code of Ethics, its Business Partners' Code of Conduct and its Modern Slavery Statement, developed in accordance with the UK Modern Slavery Act.

Services and goods not for resale

We work with suppliers that support our broader business operations, including logistics and waste contractors, and suppliers of goods not for resale such as packaging and visual merchandising.

We require all our service providers and Goods Not for Resale suppliers to comply with our Code of Conduct. Our Code of Conduct is also incorporated into our contractual agreements with partners and suppliers (see [Policies section – p. 6](#)). We also carry out ethical trade audits to monitor compliance with our Ethical Trading Code of Conduct (see [Human rights due diligence section – p. 8](#)).

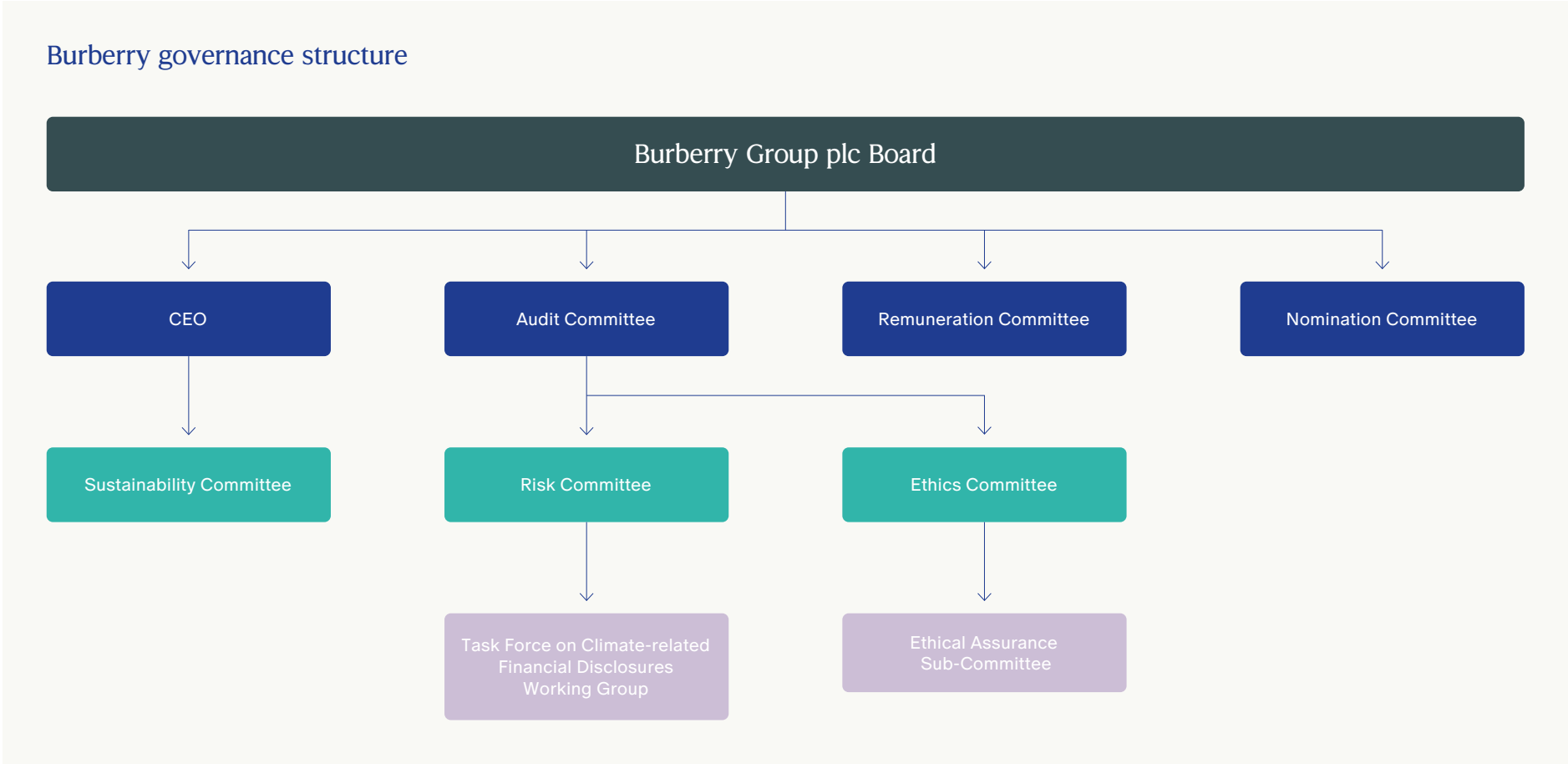


GOVERNANCE

At Burberry, we believe that respect for human rights is integral to being a responsible business. The prevention of forced, bonded, and trafficked labour is a key element of Burberry’s approach and is enshrined through our Code of Conduct.

Policies relating to modern slavery and human rights are reviewed annually by our Corporate Responsibility team and are approved by Burberry’s Ethics Committee which is chaired by the General Counsel. If any labour or human rights risks are identified, the Vice President of Corporate Responsibility will report on such issues to the Ethics Committee. The Ethics Committee reports to the Burberry Group plc Audit Committee, which is chaired by an independent Non-Executive Director.

In FY 2023/24 we completed an internal audit of our Ethical Trading Programme, which led to enhancements to our due diligence processes and the creation of our Ethical Assurance Sub-Committee, which reports into our Ethics Committee. This Sub-Committee has been operational for the past year and has allowed for better collaboration and more efficient problem-solving with our supply chain colleagues should actual or potential impacts arise. The governance structure chart below outlines the reporting lines of each of the committees.



POLICIES

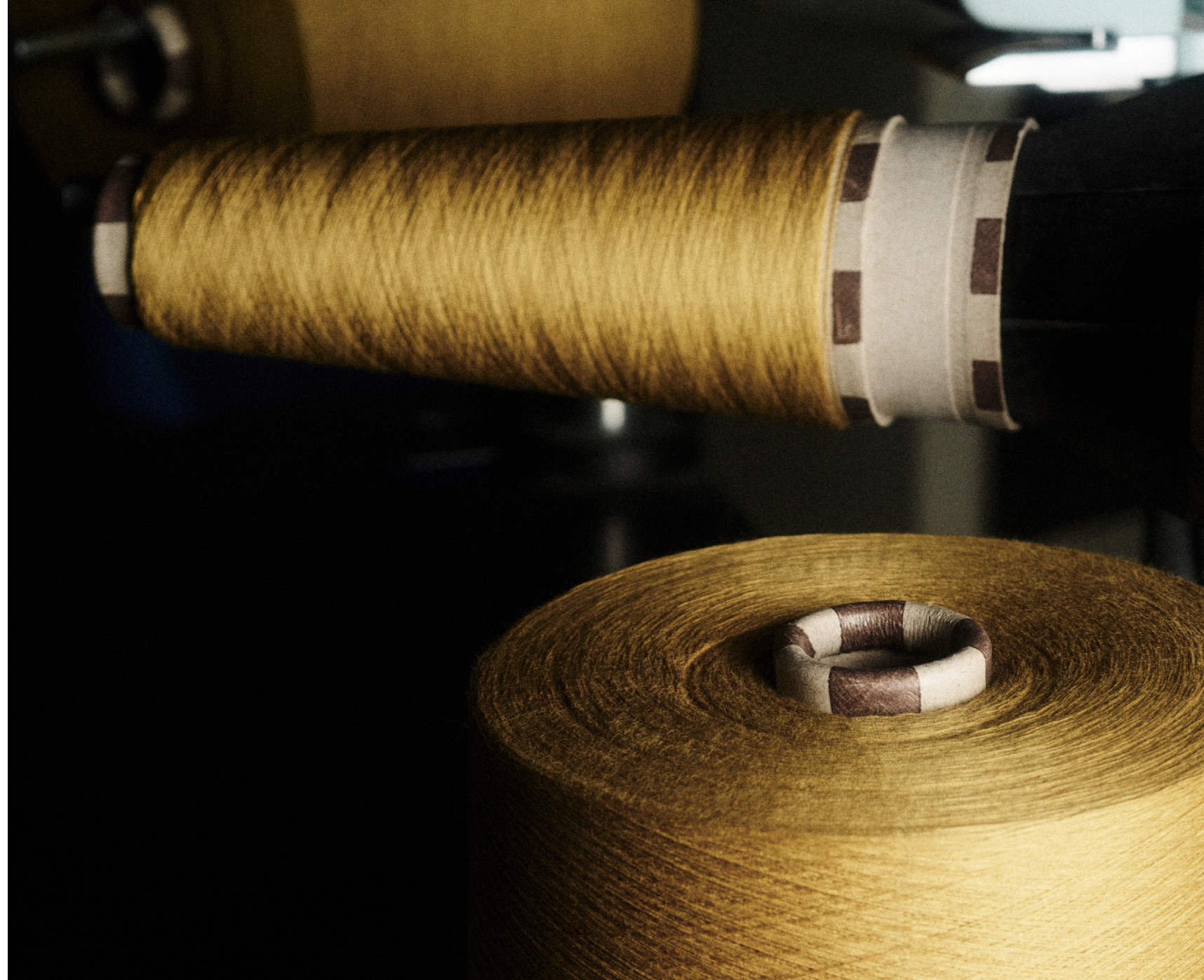
Our Code of Conduct guides our actions and supports our partners to make informed, ethical and sustainable decisions and was developed in line with our commitments and experience over many years.

Our policies within the Code of Conduct are underpinned by the Ethical Trading Initiative Base Code, International Bill of Human Rights, and the Fundamental Conventions of the International Labour Organization. We review our policies against the latest best practice guidelines and emerging regulatory requirements and update them where needed.

We seek to apply the Code of Conduct to all our business associates, which include, but are not limited to, raw material suppliers, finished goods suppliers, subcontractors, supporting facilities, non-stock suppliers, construction contractors, licensees and franchisees.

The Code of Conduct includes the following policies:

- Burberry Human Rights Policy
- Burberry Ethical Trading Code of Conduct
- Burberry Migrant Worker Policy
- Burberry Child Labour and Young Worker Policy
- Burberry Partner Non-Compliance Policy



OUR STRATEGIC APPROACH: HUMAN RIGHTS

At Burberry, we take a risk-based approach to managing our human rights and modern slavery risks. We are committed to taking action and making meaningful and lasting improvements to business practices and workplace conditions. Our human rights strategy is defined by four pillars and supports our commitment to fully embed human rights into our business practices.



Every two years, we conduct a human rights impact assessment of our operations and activities and those of our extended supply chain.

We assess and address human rights and modern slavery risks within our supply chain through our Ethical Trading Programme. We conduct a risk-based analysis of new suppliers prior to procurement and conduct ethical trading audits where risks are identified (for further details see [Human rights due diligence section – p. 8](#)).

We also have KPIs linked to our work around people in our supply chain that form a key part of our accountability measures for our strategic approach to our People pillar within our corporate responsibility strategy, Burberry Beyond. These KPIs are tracked internally and reviewed on a bi-monthly basis (please see [Social key performance indicators – p. 15](#)).

Assessing our human rights impact

We conduct regular human rights impact assessments (HRIA) of our operations and activities and those of our extended supply chain.

We have implemented this process since 2014, and our latest impact assessment commenced in Q4 of FY 2024/25, with findings due to be finalised in the first quarter of FY 2025/26. We followed a similar methodology as our previous HRIA in FY 2022/23 whereby in addition to our standard assessment, we conducted a supplementary analysis of how the human rights of vulnerable groups within our supply chain workforce may be impacted. The focus of this year's supplementary analysis is around gender and how to ensure the protection of women's rights within the supply chain. Additionally, in recognition of the intersectionality between the environment and human rights, the assessment included considerations related to the UNGA's and UNHRC's recognition of the Right to a Clean, Healthy and Sustainable Environment.

Our FY 2022/23 assessment, and more recently validated as still highly relevant through our ethical trading programmes activities, identified the following key areas where human rights violations are more likely to be identified across our supply chain. These are:

- Working and living conditions, including access to health services
- Worker voice – specific to providing remedy
- Diversity, equity and inclusion
- Modern slavery, including migrant worker recruitment journeys

Over the last year we have implemented several mitigation actions focused on these areas and we will continue to build out our action plans to drive positive impact and to further address these risk areas, including:

- Strengthening our policies and Codes of Conduct, to continue to align with international frameworks.
- Building tailored programmes to enhance the rights of vulnerable groups, i.e. migrant workers and women, supported by conducting supply chain data assessments, to ensure we direct our due diligence and social impact programmes in the most necessary areas of our supply chain.
- Capacity building and collaboration with suppliers to enhance risk prevention, through Burberry sponsored hotlines, the Worker Health Programme and supply chain training.
- Continuing to enhance and implement robust auditing and compliance programmes, to effectively identify, manage and mitigate potential violations with our Code of Conduct.
- Conducting country-specific risk assessments with the support of external experts to address our salient human rights impacts and implementing action plans to address risks identified.

Please see the following sections for further details on how our Social Impact programmes are aiming to address the impacts areas raised in our HRIA; Worker Wellbeing and Health Programmes ([p. 12](#)), Worker grievance mechanisms ([p. 13](#)), Training and resources ([p. 14](#)) and Human rights due diligence ([p. 8](#)).

HUMAN RIGHTS DUE DILIGENCE

Our approach to human rights due diligence encompasses and integrates all the activities we put in place to identify and manage social risks in our own operations and product supply chains. We review our due diligence model regularly to ensure it considers the expectations of our external stakeholders such as international regulators, consumers, investors and governments.

Last year we implemented an enhanced human rights due diligence approach. The enhanced due diligence methodology ensures a risk-driven approach across risk assessment, mitigation, prevention and remediation activities, and will help support compliance with upcoming regulations regarding protection for human rights.

Our human rights due diligence approach can be classified into four key areas of focus:

1. Risk assessment

We assess risk through a combination of approaches, such as a country risk platform Maplecroft, our Human Rights Impact Assessment and our approach to onboarding new supply chain suppliers, which includes induction training, screening and region-based risk assessments. Where extreme high risks are identified, we will reject the partner as a form of risk management.

2. Risk mitigation

We mitigate risk through our Ethical Trading Programme, focusing on ethical audits of supplier sites, and our Hotline Speaking Up! to hear workers' voices and address concerns confidentially.

3. Risk prevention

We prevent risk through our capacity building initiatives such as the Vendor Ownership Programme and IOM migrant worker journey collaboration.

4. Risk remediation

We remediate risks when they arise by listening to and acting on workers' feedback.



Due diligence in our own operations

We operate four Burberry-owned manufacturing sites, and these are included within our Ethical Trading Programme, and are risk assessed and managed in line with the standards we require of our external supply chain partners.

Our Ethical Trading Programme covers logistics and distribution centres and service providers, and this year we have conducted audits at 13 sites.

Our direct employees are recruited by internal Human Resources teams, and we also use a Managed Service Provider (MSP) that is responsible for the recruitment and management of contracted workers. The MSP has a robust ethical recruitment process in place and we have conducted due diligence on their process to ensure it is aligned with our own standards and legislative requirements.

See [page 14](#) for information on how we train our employees on Modern Slavery.

Due diligence in our product supply chain

1. Risk assessment

All our supply chain partners (Tier 1 & 2) are screened and assessed at the onboarding stage to identify any human rights and/or modern slavery risks. We require all our supply chain partners to sign a letter of undertaking acknowledging and agreeing to the Code of Conduct. This is to ensure agreement that any form of modern slavery, including forced, bonded or involuntary prison labour, is not permitted under any circumstances.

Before any new supply chain partner is approved, we assess them for any indicators of forced, bonded or trafficked labour in line with our Human Rights Due Diligence. For Tier 1 & 2 suppliers, if during this risk assessment a vulnerable workforce or geographical location risk is identified, a full audit will be completed, and the results and the remediation plans (if any) will be evaluated before a decision on providing approval is made.

Should remediation be unsuccessful at any stage and a supplier not meet our strict criteria, we will not pursue any working relationship with them.

Risk management

In line with Burberry's Code of Conduct, where extremely high risks are identified at Risk Assessment phase, we will reject the partner and not pursue any working relationship with them; Risk management aims at hindering potential negative impacts across the supply chain which we deem too severe for either workers' safety and/or wellbeing.

2. Risk mitigation

Our approach to risk mitigation relies on our Ethical Trading Programme, which comprises of auditing our supply chain partners, and monitoring compliance with the standards set out in our [Ethical Trading Code of Conduct](#).

After the risk assessment stage during onboarding, a new Tier 1 or 2 supplier will either be approved for production or will require a full on-site Ethical Trading Audit. We use a combination of internal ethical trading experts and accredited external auditing agencies to carry out ethical audits in our supply chain. Audits can be both announced or unannounced depending on the partner's risk and, where required, auditors will be accompanied by interpreters or cultural facilitators.

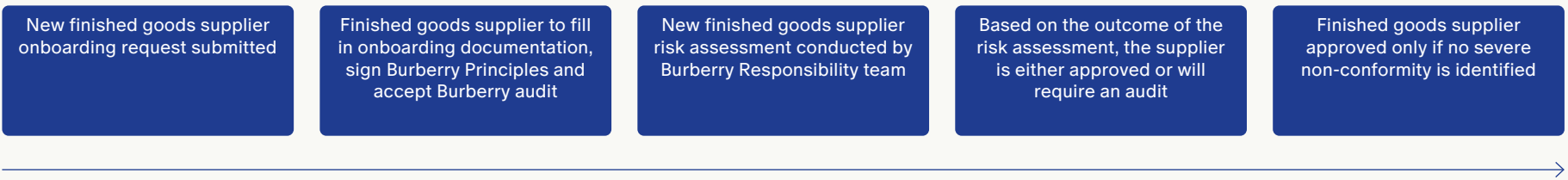
What happens during an Ethical Audit

- Site tour
- Worker interviews
- Documentation review

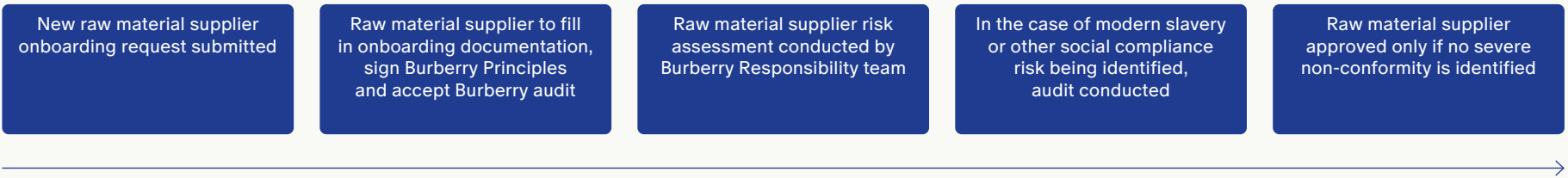
Ethical Audit Gradings

- Excellent – No issues identified
- Minor
- Major
- Critical
- Business Critical – Serious findings have been identified

Tier 1 supplier onboarding process:



Tier 2 supplier onboarding process:



After an audit, the supply chain partner receives the findings and where appropriate a proposed corrective action plan. Our Corporate Responsibility team works closely with the supply chain partner, through regular communication, to both monitor and support implementation. These action plans focus on making improvements to management systems to prevent and/or remediate modern slavery, as well as improvement the management of both human rights and health and safety risks. Once corrective action plans have been put into place by our supply chain partners, we ensure regular monitoring to ensure ongoing compliance and continuous improvement and will provide support and guidance where needed.

Our audit principles are aligned with major international ethical trading standards and regulations, as well as applicable national law, our auditors are certified to internationally recognised social audit schemes. The frequency and type of audits depends on the previous audit grading and the risk associated with the supply chain partner. These range in frequency from 3 months in case of a critical grading and high risk partner, to 36 months in case of an excellent grading and low risk partner.

Where Critical or Business Critical audit gradings are given, our Critical procedure applies, and the partner is rejected at onboarding.

We analyse all our audit findings on a global scale, to understand where to focus our remediation and social impact programmes. This year, the main areas of non-conformance with our standards across all audits conducted has remained health & safety and working hours. We will continue to work with our supply chain partners to identify the root cause of these issues and implement actions to address and prevent them. Corrective action examples include enhancing health and safety management systems and policies; ensuring all essential fire safety equipment is in place; and implementing an accurate working-hours records system.

Our Ethical Trading Programme also addresses the risk posed by unauthorised subcontracting. We have a zero-tolerance policy to unauthorised subcontracting across all levels of our Tier 1 and Tier 2 supply chain. Similarly, our supply chain partners are required to cascade this prohibition within their own supply chains. In some cases, our supply chain partners have implemented digital tracking systems to map their partner's order allocations, thus allowing for real time order checking. at authorised subcontractors' and disclosing instances of unauthorised subcontracting, if any.

Our Ethical Trading Programme also covers logistics and distribution centres, service providers and suppliers of Goods Not For Resale (GNFR). In FY 2024/25, we carried out ethical audits at suppliers of packaging and some service providers, and we will continue to enhance our risk mitigation in this area of our supply chain.

Reinforced due diligence case study

One area of focus of risk mitigation this year has been the potential risks associated with migrant workers. As a small number of our partners in Italy employ migrant workers, we have implemented a reinforced Due Diligence process to assess, remediate and prevent instances of actual or potential negative impacts on these workers.

Our approach includes:

- An extensive assessment (conducted on an unannounced basis) of the supply chain partner's operating procedures, spanning across working rights, employment practices, and fiscal due diligence.
- An internal due diligence review of Burberry's purchasing practices, to identify any connections between our sourcing policies and any non-conformities identified during our audit programme.
- Action plans that are tailored to each supply chain partner to support their capacity to address and prevent negative impacts.

All our partners have now been assessed and some were identified to have non-conformities around Working hours. These have been issued with action plans and are openly working on remediating any impacts observed. They will be reassessed in the next quarter, to validate improvements.

Ethical Trading Programme FY 2024/25 in numbers:

383

on site audits across our Tier 1 and 2 supply chains

86

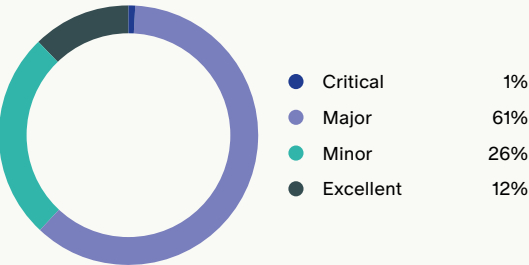
desktop assessments across our Tier 1 and 2 supply chains

1%

of our Tier 1 suppliers were identified to have Critical or Business Critical findings

75%

of our Tier 1 suppliers were either audited or remained in scope of their most recent audit during FY 2024/25 and the breakdown of our Tier 1 supply chain partners by ethical trading performance is as follows:



3. Risk prevention

Our approach to risk prevention is focused on external capacity building initiatives which support our supply chain partners including, the Vendor Ownership Programme (VOP), as well as our collaboration with IOM on a pilot scheme for our internal manufacturing sites around supporting migrant worker journeys.

IOM migrant worker journey collaboration case study

This year, as part of our continued risk prevention efforts, we extended our collaboration with the International Organization for Migration (IOM) to co-develop a pilot project to raise awareness on fair and ethical migrant workers' management. This aimed to build the capacities of our Tier 1 partners from our internal manufacturing facilities in Italy, to effectively manage migrant worker recruitment and employment practices, as well as meeting the standards set out in our [Migrant Worker Policy](#).

The capacity-building programme was designed to tailor engagement activities according to each partner's relevance level to the IOM training topics (low, medium, high). All partners were provided with a responsible recruitment and employment guidance tool and introduced to key topics through an online training session. For partners identified at a medium level, a six-module training was delivered, focusing on common risks encountered during the migrant worker recruitment and employment process. For high level partners, in addition to the actions mentioned above, a preventative action plan was co-designed by IOM and the partner's management during a one-on-one, onsite session to reinforce their capacity in managing the risks of human rights violations related to migrant workers.

Ethical trading capacity building programme

Our VOP is a key element of how we prevent risk in our supply chain. The VOP provides our key¹ supply chain partners with support to develop and run their own due diligence programme within their extended supply chains in line with our standards.

Thanks to our key supply chain partners' continued engagement, along with extensive support and training, the VOP supports our efforts to uphold our ethical standards and actively works to prevent modern slavery risks. Similarly to our Ethical Trading Programme, regular audits focused on human rights, as well as health and safety, are conducted both by our VOP partners' appointed resources, and in certain cases third party auditors, against Burberry's Ethical Trading Code of Conduct. Based on the results of the audit, improvement action plans are developed, and shared with our partners' supply chain, who work on bridging the gaps identified.

In the past year, we have upgraded our supply chain due diligence approach. As part of this, each VOP partner has set up an internal ethical committee to evaluate supply chain performance and risks, supported by governance procedures that ensure clear oversight, from onboarding to remediation and continuous improvement of their partners' performance.

We foster a community amongst our VOP partners to proactively address supply chain issues. This approach allows us to facilitate key trainings, surface common issues and collaborate on risk management supported by both our Corporate Responsibility team and external consultants where specific expertise is required.

We held two VOP community days with in-person training, including a workshop to discuss the evolution of the programme and the latest international due diligence regulations. During the session, we gathered feedback, addressed challenges, and explored opportunities to further improve the programme and meet emerging regulatory requirements.

VOP case study

This year, leveraging VOP resources' suggestions and input gathered during the in-person VOP community day sessions, we created the VOP Hub, a virtual space co-designed and co-managed with VOP resources to share knowledge and best practices.

As a result of our continuous engagement, we designed a 6-session online training course, delivered by an external consultant focused on risk mitigation tools, auditing practices and interviews techniques, as well as providing support for remediating salient non-conformities. This space will be continuously enriched by in-person engagement sessions, complementing other VOP initiatives.

We are committed to ensuring the programme remains effective and to continuing to engage new partners in the programme. During FY 2024/25 we engaged all our internal manufacturing sites into the programme and 1 partner in APAC region as a pilot.

Vendor Ownership Programme FY 2024/25 in numbers:

28
supply chain partners are engaged in the VOP

100%
of our internal manufacturing sites are in the programme

315
subcontractors are engaged through their VOP partners

26,505
workers are being reached by the VOP

52%
of our EMEIA supply chain is covered by the VOP

100%
of VOP partners established a governance system and ethical internal committee to ensure the due diligence process is embedded into their procedure

4. Risk remediation

Our approach to risk remediation ensures that when issues are identified within our supply chain, we work with our supply chain partners to address any adverse impacts on individuals, workers, and communities. We recognise that our efforts to remediate should not limit access to other available remedies.

We are also dedicated to collaborating with our business partners to help minimise the risk of any such adverse impacts in their supply chains. Additionally, we work with third-party NGOs and civil society organisations to help remediate issues. The affected stakeholders, particularly those facing human rights concerns, remain our top priority.

Our remediation approach for recruitment fees adheres to the 'Employer Pays Principle.' Under this principle, any recruitment fees paid by workers throughout their recruitment journey will be reimbursed to ensure responsible recruitment practices across our supply chain. As part of this remediation process, we engage with local partners to ensure a balanced and effective approach to addressing these issues.

Remediation case study

In November 2024, one of our raw material suppliers conducted their own due diligence on the recruitment journeys of a small number of new migrant workers. Upon their arrival, they communicated with the workers to identify if any employment fees were paid by them and, on discovering that they were, they repaid the workers in full. This due diligence and repayment process was supported and validated by a local NGO, and the supplier also committed to developing and improving policies and procedures on future migrant worker recruitment and ongoing employment practices. For example, they committed to include the 'Employer Pays Principle' as a clause in the contracts with any recruitment agencies they use.

1. Supply chain partners are selected based on volumes, value and length of relationship, this ensures that the programme addresses risk within the majority of our Tier 1 supply chain in EMEIA.

OUR SOCIAL IMPACT PROGRAMMES

Our commitment to supporting our people and their wellbeing extends to those across our value chain. That is why we complement our auditing practices with programmes aimed at addressing key social challenges and inequities. The focus of the programmes is to create positive outcomes for workers in areas such as worker voice, gender equity, worker wellbeing, and worker health and to support our partners’ capabilities to identify, manage and prevent social risks within their own facilities and value chains.

Worker wellbeing programme

We have successfully run a Worker Wellbeing Programme across our global supply chain since 2018. Our goal is to help our suppliers enhance employee satisfaction, by focusing on worker wellbeing, such as attracting and retaining talent, and creating opportunities for meaningful engagement with workers, to foster open dialogue and gather valuable insights.

Through this programme, we hold partners accountable to demonstrate a tangible commitment to preventing hidden risk, delivered through proactive worker engagement. By actively involving workers, we ensure that potential issues are identified early, allowing us to address them before they escalate into significant risks. This approach fosters a culture of open dialogue, strengthens responsibility across the supply chain, and enhances our ability to mitigate both current and future risks to workers' rights and wellbeing.

In FY 2024/25 we worked with Oxfam Business Advisory Service and an external data platform to redesign key elements of our Worker Wellbeing Programme to ensure we could share it with a larger cohort of workers and to provide better support to our supply chain partners. Throughout the past year, we have worked to ensure alignment and consistency in the delivery of the enhanced programme, launching EMEA and APAC versions of our enhanced Worker Wellbeing Programme in June 2024 and February 2025 respectively.

The programme includes:

- **Training sessions and workshops:** designed for site managers to deepen their understanding of worker wellbeing, raise awareness and promote a more inclusive work environment.
- **Wellbeing survey:** updated to cover key topics such as happiness at work, job satisfaction, personal and professional development, and physical wellbeing, available in multiple languages for greater inclusivity and accuracy.
- **Feedback:** results shared with partners through meetings, including a wellbeing performance grading that can be tracked annually with a recap report summarising key insights and next steps.
- **Wellbeing Action Toolkit:** developed with Oxfam Business Advisory Service, supports supply chain partners in creating a site-specific action plan in collaboration with workers and the Corporate Responsibility Team.
- **Regular check-ins:** conducted with supply chain partners to provide support, identify strengths and areas for improvement, and assess progress against any action plans.

In FY 2025/26 we will continue to roll out the enhanced Worker Wellbeing Programme, ensuring alignment across regions and sharing with further supply chain partners.

Worker Wellbeing Programme FY 2024/25 in numbers:

18

supply chain partners participated in the Worker Wellbeing Programme

13,670

workers in our supply chain were reached by the programme

The performance achieved by our participating suppliers is as follows:

17%

Very high satisfaction

39%

High satisfaction and

44%

Acceptable satisfaction, while

0%

achieved low or very low satisfaction

Responses are aggregated and converted into a score ranging from 1.00 to 0, which determines the overall level of satisfaction. The different score ranges are structured as follows: 1.00 - 0.85 = Very high satisfaction, 0.84 - 0.70 = High satisfaction, 0.69 - 0.55 = Acceptable satisfaction, 0.54 - 0.40 = Low satisfaction, 0.40 - 0.00 = Very low satisfaction.

Health programme

We are committed to supporting workers’ access to health education and services, as identified in our HRIA as a human rights risk. We established our Health Programme in 2015 and since then have provided more than 5,150 supply chain workers with tailored health training.

We ensure the training is effective and relevant for the workers participating, by collaborating with our supply chain partners and the medical practitioner conducting the training to identify what health topics should be covered. The four broad training modules are women’s health, men’s health, general health, and mental health, and they include topics such as reproductive health, cancer awareness and nutrition.

We also conducted a pre-training survey to understand the initial knowledge level of the attendees, which was then repeated after the training, to measure the effectiveness of the training and to continue to improve knowledge and awareness year on year.

In FY 2024/25 we extended our Health Programme to new supply chain partners across Asia and have successfully engaged with each, with the support of local NGOs and organisations.

Health Programme FY 2024/25 in numbers:

991

supply chain workers participated in the Health programme

1,700

approximate hours of training provided to supply chain workers

Homeworkers

Homeworkers are highly skilled individuals who are integral to fashion supply chains. This method of working helps to support a worker’s family life while also maintaining an income.

An area of our supply chain with a small but significant number of homeworkers is Japan, where workers have supported demand since the 1970s. One example is in shoemaking, where leather cutting, skiving, upper-making, and bottoming processes all have different specialists using machines and chemicals in the workshops in their homes.

We are committed to raising awareness on home workplace safety and the wellbeing of these workers. We are supporting our supply chain partners in conducting homemaker visits and implementing a newly developed homemaker checklist to ensure safe working conditions are observed.

Living wage

We are committed to the promotion and adoption of a living wage in our own operations and supply chain and are proud to become the first luxury retailer and manufacturer to achieve accreditation as a UK Living Wage Employer. Several of our UK suppliers are Living Wage Employers, including our longest-standing partner Johnston’s of Elgin, manufacturers of our Heritage cashmere scarves.

In 2016, we joined the Global Living Wage Initiative, which works to address in-work poverty across all sectors and multiple geographies, as part of a unified, global approach with multi-stakeholder participation.

Worker grievance mechanisms

We ensure that employees and workers in our supply chain have access to confidential support and advice through our global grievance mechanism, Burberry Confidential.

Burberry Confidential is a global hotline available to all of our stakeholders and key rightsholder groups (including employees, supply chain workers, communities and our customers). It ensures we have a legitimate, predictable, equitable, transparent and rights-compatible mechanism available to all. Access to this hotline ensures that human rights violations or any other breaches of Burberry’s Code of Conduct are reported, addressed and prevented from recurring or escalating.

Since the start of 2025, we have been engaging with our Tier 1 suppliers, to raise their awareness about the hotline, through comprehensive training programmes. We included both our supply chain partners and specific groups of the workforce that may benefit from additional engagement and support, to ensure they are fully equipped to utilise and benefit from this resource. Looking ahead, we plan to further communicate the use of this channel, to reach Tier 2 suppliers and beyond during FY 2025/26.

We also sponsor confidential hotlines in the APAC region run by NGOs for workers in our supply chain, which provide advice on workers’ rights, wellbeing, and confidential support. We invite new supply chain partners to join the programme on an annual basis. This year we focused on expanding the programme to new supply chain partners in Asia, where we successfully ran several awareness-raising and induction sessions to ensure successful engagement with hotline services. Throughout the year, the Corporate Responsibility team and the NGOs have continued to conduct awareness-raising sessions to promote the use of the confidential hotline to supply chain workers, highlighting its benefits and all services provided. Grievance resolution is regularly monitored by the Corporate Responsibility team.

Our Ethical Trading Code of Conduct also recognises the right for employees to join trade unions and collective bargaining. Approximately 78% of the Tier 1 production sites we source from are covered by national and/or industrial collective bargaining agreements and many have established union representation, enabling workers to remain informed and involved in discussions about their rights.

APAC Worker Grievance Mechanism FY 2024/25 in numbers:

29,442

workers in our APAC supply chain are covered by our NGO sponsored hotlines

100%

of our APAC Tier 1 supply chain workers are covered by our NGO sponsored hotlines

451

calls made to our NGO sponsored hotlines

These calls included:

34

complaints

413

consulting requests

4

psychological support requests

99%

of all complaint calls have been addressed and responded to

Worker hotline case study

In the past year our worker hotlines within the APAC region have provided our supply chain workers with the opportunity to share their concerns with management through a confidential channel, on a regular basis, leading to several changes to ways of working, production site set-up and improvements in benefits offerings to workers.

For example, workers on a production site felt they weren’t able to take their lunch break or were asked to work over this lunch break instead of taking their lunch in the canteen. Workers raised their concerns with the hotline, and the NGO supporting our hotline was able to discuss these concerns with management at the production site. This led to measures being put in place that encouraged all workers to take their lunchbreak, including turning off the lights and the admin controls for machinery on the production site floor to ensure workers actively stepped away from their work during this time.

TRAINING AND RESOURCES

Our employees and supply chain partners are essential in helping to identify and prevent modern slavery in our supply chain. Our commitment to ensuring both internal and external training on modern slavery in the supply chain ensures we remain proactively vigilant in creating a responsible supply chain.

Burberry internal teams’ training

During their onboarding, all employees are introduced to our responsibility policies and programmes to ensure they have a clear understanding of our commitments in this area. Additionally, our Code of Conduct, which includes key policies on human rights and modern slavery, is shared with all employees as part of their onboarding into Burberry, and a refresher is provided through annual mandatory training.

Raising awareness and conducting training on the risks associated with modern slavery is critical for those making sourcing decisions. In FY 2024/25, we worked with an external learning developer to create an online Modern Slavery training programme. This has allowed us to designate this training as mandatory for key teams, including Supply Chain, Product Development, Corporate Responsibility and Human Resources.

This training helps those who have close contact with our supply chain to be more familiar with the risk areas, likely indications of human rights abuses (including instances of modern slavery) and possible actions to take if an incident of modern slavery is identified. The training also has a module on responsible buying practices, to explain the link between purchasing practices, potential impact on working conditions and the risk of human rights violations. This training has helped further embed respect for human rights throughout the business.

Burberry Internal Teams Training FY 2024/25 in numbers:

1,515

employees were invited to complete this mandatory training

58%

of those employees have completed this training

Supply chain training

Our partners play an integral role in helping us to identify and mitigate the risk of modern slavery in our supply chain and we invest in training them to support this. As part of our supplier onboarding process, we conduct training with all our new Tier 1 suppliers to ensure they have a clear understanding of our ethical trade requirements before an audit takes place. We highlight the importance of being transparent during an ethical audit and share how our Ethical Trading Programme works.

This year we continued to collaborate with the IOM in rolling out its introduction to migrant workers’ protection awareness-raising programme globally for the second year. The IOM programme, covering introduction to fair and ethical recruitment, migrant workers’ risks, and employer responsibilities, has been contextualised for our supply chain partners, to raise awareness on country-specific risks facing migrant workers.

This was designed to help educate our Tier 1 suppliers, Tier 2 suppliers and licensee partners on how to ensure the protection of migrant workers, with a specific focus on their recruitment journey. It also includes diversity and inclusion best practices to support the integration of migrant workers into the local workshop population.

Supply Chain Training FY 2024/25 in numbers:

227

supply chain partners received training

15

countries were covered during our training programme

51,250

workers impacted by the training

Working with others

We aim to collaborate and work in partnership with others to identify and manage human rights and modern slavery risks. We participate in numerous cross-industry groups and partnerships including, Business for Social Responsibility’s (BSR) Human Rights Working Group. We became members of BSR in 2022 and joined their Human Rights Working Group, which was established to help companies implement the UN’s Guiding Principles on Business and Human Rights (UNGPs). It supports companies to share best practices, challenges and experiences implementing the UNGPs and to learn about both foundational human rights approaches and emerging issues.

We also work with other experts in human rights to support with bespoke projects around wellbeing, impact measurement, human rights impact assessments and worker voice case working. Such experts include the International Organization for Migration (IOM), SLR Consulting, Kumi Consulting, Ulula and Inno Community Development Organisation.

SOCIAL KEY PERFORMANCE INDICATORS

Our Social KPIs and key commitments that Burberry has made around human rights ensure we have measurable, impactful, and engaging metrics to track progress in how we protect human rights and prevent modern slavery in our supply chain.

KPI	FY 2023/24 Performance	FY 2024/25 Progress	Commentary
Deliver Modern Slavery training to our internal sourcing and human resources teams	125 colleagues trained	883 colleagues trained across 14 teams	This equated to 58% of the employees invited to attend
Deliver Human Rights training to our key ¹ Tier 1 supply chain partners	246 partners cross 15 countries participated and impacted approximately 57,690 workers	227 partners cross 15 countries participated and impacted approximately 51,250 workers	83% of key Tier 1 supply chain partners received training
Engage supply chain partners in the Vendor Ownership Programme	24 supply chain partners engaged	28 supply chain partners engaged	Expanded to three new partners in EMEIA and 1 in APAC
Deliver the Health Training Programme to continue to provide health consultations and access to services	830 workers participated	991 workers participated	Expanded to two new facilities
Implement the Worker Wellbeing programme across our Tier 1 supply chain	11,650 workers impacted	13,670 workers impacted and expanded to 11 new partners	22% of Tier 1 workers impacted across our global supply chain
Implement Worker hotlines across our Tier 1 supply chain	79% of Tier 1 supply chain workers covered by hotlines	100% of Tier 1 supply chain workers covered by hotlines	Hotline reaches approximately 29,450 workers and expanded to five new facilities
100% of calls received by workers have been addressed and responded to by the supply chain partner	77% of calls addressed	Over 99% of calls addressed	The remaining four out of 451 cases have action plans in place

1. Supply chain partners selected based on production volumes, value and length of relationship.

LOOKING AHEAD

We continue to look for ways to strengthen our human rights strategy by actively monitoring new human rights and corporate sustainability legislation and making the required adjustments to support our compliance with a changing regulatory landscape.

A key focus in the coming year will be to implement our enhanced human rights due diligence model to ensure we continually make improvements and limit risk within supply chain. We are committed to developing and implementing prevention and remediation programmes that will address our most salient impacts in strategic geographical areas as well as across our wider value chain.

We will focus on embedding human rights at all levels of our business operations and driving positive impact for workers across the supply chain.

Over the next year we will increase our efforts to strengthen our supply chain traceability, in line with our FY 2029/30 commitments. We believe that our focus on transparency and traceability throughout the supply chain will further strengthen our ability to identify modern slavery risks and address emerging challenges.

Approved by the respective boards of Burberry Limited (company number 162636), Burberry (UK) Limited (company number 4288292), Burberry International Holdings Limited (company number 4251867), Burberry Limited (registered in the State of New York under DOS ID 293943), Burberry (España) Holdings Limited (company number 5265289), Thomas Burberry Holdings Limited (company number 3509143), Burberry Haymarket Limited (company number 4868493), Burberry Holdings Limited (company number 4251948), Burberry Canada Inc (corporation number 689541-7), Burberry Pacific Pty Ltd (ACN 098 381 161), and Burberry London Limited (company number 4251951)

Approved by the Board on Thursday 8 May 2025 and signed on its behalf by:

Joshua Schulman
Chief Executive Officer

Burberry Group plc



APPENDIX

Our Burberry Beyond strategy addresses sustainability-related impacts, risks and opportunities across our value chain. The visual below breaks down our value chain in more detail.

