

HUMAN RIGHTS POLICY

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CUSTODIAN: Michael Mahony

BURBERRY

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OBJECTIVE

To state Burberry's commitment to respect human rights and mitigate the risk of violation of human rights as a consequence of Burberry's business operations and activities.

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

SCOPE AND STANDARDS OF REPORTING

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

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

DEFINITIONS

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

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

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

All references to **"operations"** include Burberry's wholly or partially owned entities

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

HUMAN RIGHTS MATERIALITY ANALYSIS

Burberry conducted a Human Rights Materiality Analysis. Burberry identified the Human Rights of 4 stakeholders to be where Burberry’s principle duty lay to respect and provide remedy.

Burberry workforce
Supply chain workers
Communities impacted by Burberry operations
Burberry customers

Through the implementation of policies and tools, such as the Ethical Trading Programme in the global supply chain, we are aware that Human Rights risks may be disproportionately found within groups of vulnerable workforces and subsequently we have developed specific policies to address the rights and needs of supply chain workers including migrant and home based workers, as well as having equal opportunity and anti-harassment policies in place.

Burberry will prioritise preventing the occurrence of the most severe violations and addressing the most severe Human Rights violations.

BURBERRY HUMAN RIGHTS STANDARDS

Core standards

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

- Burberry will engage where relevant in multi stakeholder dialogue on the issue of Human Rights

Reporting and assessment

- Burberry will continue to conduct on-going analysis of Human Rights impacts e.g. through the implementation of the Burberry Ethical Trading Policy through the Ethical Trading Programme.
- Burberry will conduct at least 2 yearly reviews of the Human Rights Materiality Analysis to ensure the approach is relevant, effective and addresses Human Rights violations.
- Burberry will develop impact assessment frameworks to measure the effectiveness of the Policy.
- Burberry will annually monitor and report Burberry's compliance with the above standards through the company's governance structure.

HUMAN RIGHTS SYSTEM

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

1) **POLICIES AND TOOLS**

Burberry has the below operational policies and tools to protect the Human Rights of the 4 stakeholders identified above

<i>To protect the Burberry Workforce</i>	<i>To protect the Supply chain</i>	<i>To protect Communities</i>	<i>To protect Customers</i>
Code of Ethical Business Principles	Ethical Trading Code of Conduct	Ethical Trading Code of Conduct	Customer Welfare Incident Policy
Anti-bribery and Anti-corruption Policy	Migrant Worker Policy	Migrant Worker Policy	Burberry Customer experience training for Burberry employees
Equal opportunities and anti-harassment Policy	Correction and Disciplinary Policy	Homeworker Policy	Product safety policies and appropriate product labeling
Global Policy Statements and ways of working	Anti-bribery and Anti-corruption Policy	Environment Policy	Health and Safety Policy
Health and Safety Policy	Homeworker Policy	Ethical Sourcing Policy	Equal opportunities and anti-harassment Policy for store staff

Grievance Procedure and Disciplinary Policy	Non-profit Confidential worker hotline ¹	Community Investment Policy	Grievance Procedure and Disciplinary Policy for store staff
Burberry Confidential ²	Burberry Confidential (for vendors)	Traceability systems	Customer Services

2) IMPLEMENTATION

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

Our Workforce

The Human Rights of Burberry's Workforce are protected through the globally located Human Resources and Health and Safety departments, who follow and implement the policies above.

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

The supply chain and communities

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

The Corporate Responsibility team, in partnership with the commercial teams, are responsible for the implementation of the Ethical Trading Policy through the Ethical Trading Programme³ in place to ensure that Human Rights in the supply chain are respected. Burberry recognises this responsibility globally and especially in states where Human Rights, labour and environmental standards are absent, weak, or poorly enforced. Burberry also acknowledges and respects different national cultures, with their own laws, norms and traditions.

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

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

³ More information regarding the Ethical Trading Programme can be found at: http://www.burberryplc.com/documents/corporate_responsibility/ethical_trading_process.pdf

The Policy applies throughout the supply chain to raw material level – e.g. farm level and Burberry continues to map supply chains more deeply to address, amongst other things, any Human Rights risks further down the supply chain.

Customers

Customers both directly and indirectly interact with a number of Burberry departments. Burberry staff is trained to protect customer safety and welfare as well as supporting customers with product aftercare in a professional manner. Teams responsible for product safety also follow strict and embedded company policies

3) GRIEVANCE MECHANISMS

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

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

Our Workforce

Our Workforce is entitled to seek remedy in the case of perceived infringements of their Human Rights.

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

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

Any grievances made are logged, processed with outcomes recorded.

The supply chain and communities

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

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

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

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

Customers

Customers are able to report any issue regarding product or customer experience with the global 24 hour customer service team.

Any grievances made are logged, processed with outcomes recorded.

4) SYSTEM EXAMPLES

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

RESPONSIBILITIES AND REVIEW

Overall responsibility for this Policy resides with the CEO.

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

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

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