

Burberry Anti Bribery, Anti Corruption, Gifts and Hospitality Policy Statement

Burberry Group (the “Group”) is committed to ensuring that we engage with employees, customers and suppliers not only in accordance with legislation but ethically and with independence and integrity. Doing so is core to the brand, Burberry’s reputation and Burberry’s business strategy.

Burberry does not tolerate bribery or corruption in any form. Consequently all reasonable steps are taken to prevent bribery and corruption in connection with the Group. All employees, and third parties associated with Burberry are expected to conduct themselves in accordance with the highest ethical standards at all times.

1. Code of conduct

The Group’s Anti-Bribery and Anti-Corruption Policy, which is incorporated into Burberry’s Global Ways of Working, prohibits bribery and corruption in all forms and is supported and endorsed by the Board and senior executive management.

Burberry’s employees must not (and third parties associated with Burberry must not), engage in any activity which is, or could be perceived to be, corrupt, improper or unlawful. Accordingly Burberry will not provide and will not accept any item of value (in cash or kind) to influence or be influenced by vendors, suppliers, wholesale customers, licensees, franchisees, joint venture partners, third party business associates or government officials. The Group must not offer gifts or entertainment as an advantage intending to commit bribery. All gifts and entertainment must be given or received in accordance with the Group’s Gifts and Hospitality Policy (together with the Anti-Bribery and Anti-Corruption Policy, the “Policies”). All suspected breaches of the Policies will be investigated and, where appropriate, disciplinary action taken.

2. Training

The Policies are communicated globally, both internally and externally and by a variety of methods. Training, on an on-going basis, is given to employees and third parties which is appropriate to individuals’ needs and the potential risks relating to their functions or businesses.

3. Raising concerns

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with the Group. Knowing about possible corrupt practices and failing to notify these will be regarded as a serious matter, resulting in possible disciplinary action. Employees and third parties can report any concerns or suspected cases of misconduct in confidence through Burberry Confidential (Burberry’s third-party managed confidential helpline). Alternatively, Employees may report their concerns or cases of misconduct to the HR Director or the Regional Asset and Profit Protection Manager for their business area.

4. *Monitoring and review*

The Global Ethics Committee is responsible for the on-going review and monitoring of compliance with the Policies. The Committee sets priorities, considers key issues, implements processes and reports regularly on this to Burberry senior management and to the Board Audit Committee. The Board Audit Committee also receives regular reports on any incidents reported via Burberry Confidential.