

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Burberry
Sector Apparel (supply chain only)
Overall score 29.6 out of 100

Theme score	Out of	For theme
4.8	10	A. Governance and Policy Commitments
11.6	25	B. Embedding Respect and Human Rights Due Diligence
4.0	20	C. Remedies and Grievance Mechanisms
3.2	25	D. Performance: Company Human Rights Practices
5.9	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Human Rights Policy indicates: 'We are committed to respecting and safeguarding the human rights those who are directly or indirectly impacted by Burberry'. [Human Rights Policy, 03/2021: burberryplc.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Human Rights Policy indicates: 'We are committed to [...] respecting and upholding the Human Rights principles set out in: [...] UN Guiding Principles on Business and Human Rights'. [Human Rights Policy, 03/2021: burberryplc.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Human Rights Policy indicates: 'We are committed to [...] respecting and upholding the Human Rights principles set out in: [...] the ILO Declaration of Fundamental Principles and Rights at Work'. [Human Rights Policy, 03/2021: burberryplc.com] Met: Explicitly lists all four ILO core principles: The Human Rights Policy indicates: 'All Business Associates are expected to comply with all applicable laws and human rights standards included in this Policy. The eight fundamental Convention areas are as follows: '1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87); 2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98); 3. Forced Labour Convention, 1930 (No. 29); 4. Abolition of Forced Labour Convention, 1957 (No. 105); 5. Minimum Age

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			<p>Convention, 1973 (No. 138); 6. Worst Forms of Child Labour Convention, 1999 (No. 182); 7. Equal Remuneration Convention, 1951 (No. 100); 8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)'. [Human Rights Policy, 03/2021: burberryplc.com] & [Child Labour and Young Worker Policy, 06/2021: burberryplc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The Ethical Trading Code of Conduct has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] • Met: Explicitly lists all four ILO core principles for suppliers: The Ethical Trading Code of Conduct has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it adds: 'Workers, without distinction, have the right to join or form trade unions of their own choice and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Global Health and Safety Policy indicates: 'Burberry is committed to providing a safe, healthy environment for its employees, customers, suppliers and anyone else who visit or work on or otherwise visits its stores, offices, factories or other premises. Burberry therefore manages its business in a way that is designed to ensure that we maintain the highest standards of health and safety which are reasonably achievable throughout our global operations'. [Global Health and Safety Policy, 16/05/2022: burberryplc.com] • Met: Commitment to ILO working hours standards or 48 hour regular work week: The Human Rights Policy indicates: 'We are committed to, and require all Business Associates to commit to, respecting and upholding the human rights principles set out in [...] The ILO Conventions on Labour Standards on Working Hours'. [Global Health and Safety Policy, 16/05/2022: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Ethical Trading Code of Conduct indicates: 'A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practical, the causes of hazards inherent in the working environment'. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] • Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Ethical Trading Code of Conduct indicates: 'Working hours must comply with national laws, collective agreements, and the provisions of paragraphs [...] below, whichever affords the greater protection for workers. Paragraphs [below] are based on international labour standards. Working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week. All overtime shall be voluntary. [...] Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. The total hours worked in any 7 day period shall not exceed 60 hours (including overtime), except where covered by paragraph [...] below. Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies'. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com]
A.1.3.AP	Commitment to respect human rights particularly	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to women's rights: See below. A commitment to the Women's Empowerment Principles (WEP) is a proxy for 'respecting women's rights, according

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	relevant to the sector – vulnerable groups (AP)		<p>to CHRB standards. [2022-23 Annual Report, 2023: burberryplc.com] & [Global Diversity Inclusion Policy, 07/2020: burberryplc.com]</p> <ul style="list-style-type: none"> • Met: Expects suppliers to respect these rights: The Migrant Work Policy indicates: ‘Burberry requires its Business Associates to respect the above principles and conventions’. It includes the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families’. The Human Rights Policy indicates that ‘finished goods vendors, raw material and/or component suppliers, are part of the Company’s Associates. [Migrant Work Policy, 03/2021: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com] <p>Score 2</p> • Met: Commitment refers to CEDAW/Women's Empowerment Principles: The Company is a UN Women's Empowerment Principle since 2021. [WEP_web, N/A: weps.org] • Met: Expects suppliers to respect these rights: The Migrant Work Policy indicates: ‘Burberry requires its Business Associates to respect the above principles and conventions’. It includes the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families’. The Human Rights Policy indicates that ‘finished goods vendors, raw material and/or component suppliers, are part of the Company’s Associates. [Migrant Work Policy, 03/2021: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com]
A.1.4	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to remedy adverse HRs impacts: The Human Rights Policy indicates: ‘We are committed to remedying any adverse impacts on individuals, workers and communities that we have caused or contributed to and recognise this should not obstruct access to any other remedies’. [Human Rights Policy, 03/2021: burberryplc.com] • Met: Expects suppliers to make this commitment: As indicated above, the Human Rights Policy states: ‘We are committed to remedying any adverse impacts on individuals, workers and communities that we have caused or contributed to and recognise this should not obstruct access to any other remedies’. ‘The Policy covers all our Business Associates. The Policy sets out the human rights standards that Burberry strives to adhere to, as well as the mechanisms for remedy. All Business Associates are expected to comply with all applicable laws and human rights standards included in this Policy’. ‘“Business Associates” refers to any individual, entity, business, company, partnership or any other body or group associated with Burberry including, without limitation, any such individual, entity, business, company, partnership or any other body or group supplying products, goods, raw materials, components, services, real estate or anything else, directly or indirectly, to any member of the Burberry Group or otherwise working directly or indirectly with or on behalf of any member of the Burberry Group’. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com] <p>Score 2</p> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Human Rights Policy indicates: ‘we are committed to working with our Business Associates to remedy adverse impacts which are directly linked to our operations, products or services and through collaborating with third-party NGOs or civil society to remediate any issues. The affected stakeholders of any human rights concern will remain our foremost priority’. No details found, however, regarding commitment to collaborate with judicial mechanisms. [Human Rights Policy, 03/2021: burberryplc.com] • Met: Commitment to work with suppliers on remedy: The Human Rights Policy indicates: ‘we are committed to working with our Business Associates to remedy adverse impacts which are directly linked to our operations, products or services and through collaborating with third-party NGOs or civil society to remediate any issues’. [Human Rights Policy, 03/2021: burberryplc.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: The Human Rights Policy indicates: ‘We prohibit retaliation against anyone raising a complaint and will respect the rights of any other stakeholders raising human rights related concerns including human rights defenders’. However, this indicator looks for a general commitment to not tolerate threats or attacks on Human Rights defenders. This statement seems to focus in a commitment to non-retaliation only in the grievance mechanism context. The Company has provided further comments to CHRB regarding this indicator, on what it expects from suppliers in relation it human

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			<p>rights defenders [see below]. However, no other general statement of commitment found. [Human Rights Policy, 03/2021: burberryplc.com]</p> <ul style="list-style-type: none"> • Not Met: Expects suppliers to make this commitment: See above. The Human Rights Policy indicates: 'We also expect all our Business Associates to respect the rights of human rights defenders'. [Human Rights Policy, 03/2021: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The 2022/23 Annual Report indicates: 'Responsibility for the [Human Rights] policy lies with Burberry's Chief Executive Officer'. However, the CEO is involved with the day-to-day management of the company as well as holding a board position. This means this role cannot be considered as a purely supervisory one as required by this indicator. The Human Rights Policy adds: 'The implementation of human and labour rights is overseen by the Chair of the Ethics Committee, who has operational responsibility for human and labour rights and reports into the CEO and the board'. However, the does not seem to belong to the Supervisory Board. It is not clear a Board member or Board committee tasked with specific governance oversight of respect for human rights. [Annual Report 2021/22, 17/05/2022: burberryplc.com] • Not Met: Describes HRs expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to review HRs strategy at board level: The Company states that 'Human rights risks are reported via the Burberry Ethics Committee, chaired by the General Counsel, and attended by the Company Secretary, Senior Vice President of Risk Management and Audit, Vice President of Corporate Responsibility and Director of Asset and Profit Protection. The Ethics Committee reports to the Risk Committee, which reports to the Audit Committee at Board level.' The Company's human rights policy further reads 'Overall approval and responsibility for this Policy resides with Burberry's Chief Executive Officer, Marco Gobetti, who is an Executive Director on the company Board. The implementation of human and labour rights is overseen by the Chair of the Ethics Committee, who has operational responsibility for human and labour rights and reports into the CEO and the board. [...] Key areas of risk will be reported to the Burberry Ethics Committee as they arise. If there are any changes in risk levels or new and emerging risks identified, these will be reported to the Burberry Risk Committee on a half yearly basis'. It is not clear, however, how the Supervisory Board is actually kept informed and discusses human rights commitments to processes, as current evidence seems to focus on responsibility allocation and the audit committee being briefed about risks, including human rights. it is not clear whether a Board member or Board committee is regularly briefed on human rights. [Ongoing initiatives and policies, N/A: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com] • Met: Example of HRs issues/trends discussed in last reporting period: The 2022/23 Annual Report indicates that the principal areas of focus for the Board during FY 2022/23 included: 'Reviewing and approving the Company's Modern Slavery Statement'. [2022-23 Annual Report, 2023: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies

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A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks: The 2022/23 Annual Report indicates: 'Our latest impact assessment took place in the fourth quarter of FY 2022/23, where in addition to our standard assessment we conducted a supplementary analysis looking at where migrant workers' human rights may mostly be affected'. However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Board level or a Board committee. This indicator focuses on the Company business model rather than focusing on the risk. [2022-23 Annual Report, 2023: burberryplc.com] • Not Met: Describes frequency and triggers for reviewing business model: The 2022/23 Annual Report indicates: 'Every two years, we conduct a Human Rights Impact Assessment (HRIA) of our operations and activities and those of our extended supply chain. We have implemented this process since 2014 and continue to evolve and develop our human rights due diligence approach as well as our Ethical Trading Programme'. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights. [2022-23 Annual Report, 2023: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews: The 2022/23 Modern Slavery Statement discloses some of its KPI's, progress and planned action for each KPI. It included data on: Burberry internal teams training; Supply chain training; Audits and assessments; Worker voice; Wellbeing; Human Rights Impacts. However, no example found of an action taken as a result of a discussion and review of its business model and strategy for inherent risks to human rights at Board level or a Board committee. The Company is expected to provide an example that reflects a change in organisation structure because of specific human rights inherent risk. [2022-23 Modern Slavery Statement, 2023: burberryplc.com]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The Company's human rights policy indicates that: 'The implementation of human and labour rights is overseen by the Chair of the Ethics Committee, who has operational responsibility for human and labour rights and reports into the CEO and the board... We also seek out the advice of the Ethics Committee on a quarterly basis. [Human Rights Policy, 03/2021: burberryplc.com] & [Ongoing initiatives and policies, N/A: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The Company further notes that 'Responsibility for the Human Rights Policy lies with Burberry's Chief Executive Officer, while day-to-day operational responsibility lies with our Chief People Officer and global HR team, who ensure that the policy is upheld in our direct operations.' [Human Rights Policy, 03/2021: burberryplc.com] • Not Met: Day-to-day resources and expertise allocation in own operations: The 2022/23 Modern Slavery Statement indicates: 'We have a Responsibility team consisting of over 40 specialists in key locations globally, with targets relating to our supply chain owned and monitored by dedicated teams. Burberry employees who are responsible for supply chain partner relationships and sourcing have personal KPIs related to labour conditions, recognising the potential impact of fair purchasing practices on labour conditions throughout our supply chain'. However, the Company is expected to provide some description of expertise or numbers, indicating how resources are available within its own operations [supply chain resources are assessed in the subindicator below]. [2022-23 Modern Slavery Statement, 2023: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Resources and expertise allocation in supply chain: The 2022/23 Modern Slavery Statement indicates: 'We have a Responsibility team consisting of over 40 specialists in key locations globally, with targets relating to our supply chain owned and monitored by dedicated teams. Burberry employees who are responsible for supply chain partner relationships and sourcing have personal KPIs related to labour conditions, recognising the potential impact of fair purchasing practices on labour conditions throughout our supply chain. Our Ethical Trading Programme is supported and monitored internally by several management committees. The programme aims to ensure that the potential risks to labour and human rights are considered at all appropriate levels and areas of the business. [...] If any labour or human rights risks are identified, the Vice President of Corporate Responsibility will report on such issues to the Ethics Committee as well as the Group's Risk Committee'. [2022-23 Modern Slavery Statement, 2023: burberryplc.com]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments: The Company indicates that: 'both the annual bonus and Burberry Share Plan (BSP) awards for the Executive Directors include a link to our ESG priorities'. However, no evidence that these priorities comprise its human rights policy commitments was found. [Annual Report 2021/22, 17/05/2022: burberryplc.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HRs risks integrated as part of enterprise risk system: The Company states that it has a Human Rights Impact Assessment that covers human rights risks, however, no information regarding how this is integrated into its broader enterprise risk management system was found. [Human Rights Impact Assessment, N/A: burberryplc.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assessment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Code of Conduct states that: 'Our leadership team and line managers are responsible for promoting adherence to the Code through appropriate communication, training and modelling behaviours'. The Code introduces the Company's policies, however, no information related to how the communication process occurs was found. The document Responsible Business Principles indicates: 'Burberry will communicate and promote the Burberry Responsible Business Principles internally and externally so far as reasonably practicable to all Business Associates. Business Associates are expected to establish and maintain systems and controls to ensure compliance with the Principles including promoting the Principles to all of their employees, workers, agents and representatives and, where appropriate and reasonably practicable, throughout their supply chain. Business Associates shall appoint a senior member of their management to be responsible for compliance with the Principles. The Business Associate's appointed members of management should provide appropriate training and guidelines to support the communication and implementation of the Principles'. However, no description found on how it proactively communicates its policy commitment to all its workers [communication to suppliers is assessed in B.1.4.b], including in local languages where necessary. [Code of Conduct, 2022: burberryplc.com] & [Responsible Business Principles, 10/2022: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience: The Code of Conduct indicates: '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'. However, although the Code makes reference to the Human Rights Policy, it does not include all of the Human Rights Policy. The subindicator looks for an example how the Company ensures the form and frequency of the information communicated [its policy commitments] is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			accessible to its intended audience, including local communities. [Code of Conduct, 2022: burberryplc.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a • Met: Requires suppliers to communicate HRs policies: The 2021/22 Modern Slavery Statement indicates: 'Compliance with the Principles is a requirement of doing business with Burberry. Adherence to the Principles is included in contracts with suppliers. They sign a letter of undertaking confirming, amongst other matters, their commitment to the Principles and responsibility to cascade the Principles within their own supply chains'. See below further details. [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The 2021/22 Modern Slavery Statement indicates: 'Compliance with the Principles is a requirement of doing business with Burberry. Adherence to the Principles is included in contracts with suppliers. They sign a letter of undertaking confirming, amongst other matters, their commitment to the Principles and responsibility to cascade the Principles within their own supply chains. [...] Additionally all suppliers are required to acknowledge and sign Burberry's Responsible Business Principles during onboarding to ensure mutual agreement that any form of modern slavery, included forced, bonded or involuntary prison labour, is not permitted whatsoever'. The Responsible Business Principles contain human rights provisions. [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com] • Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The 2021/22 Modern Slavery Statement indicates: 'Compliance with the Principles is a requirement of doing business with Burberry. Adherence to the Principles is included in contracts with suppliers. They sign a letter of undertaking confirming, amongst other matters, their commitment to the Principles and responsibility to cascade the Principles within their own supply chains. [...] The Principles apply to all our business associates, which include, but are not limited to: finished goods vendors, subcontractors, supporting facilities, raw material suppliers, non-stock suppliers, construction contractors, licensees and franchisees'. Also, 'Our audits also address the risk posed by unauthorised subcontracting. As a global organisation, we accept our responsibility to support and guide our partners by raising awareness of associated risks of modern slavery at subcontractors. Our partners have extended the no-tolerance policy of unauthorised subcontracting to all of their partnerships and in some cases implemented digital tracking systems to prevent outsourcing'. The Ethical Trading Code of Conduct notes: 'Business Associates are not authorised to sub-contract any part of their business related to the production of goods or services they provide either directly or indirectly to Burberry, without the prior written consent and approval of Burberry'. [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com] & [Responsible Business Principles, 10/2022: burberryplc.com]
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Code of Conduct describes the responsibility for 'promoting adherence to the Code through appropriate communication, training and modelling behaviours', however, the Code does not include human rights policy commitments, and no information related to how the training process occurs was found. The 2021/22 Modern Slavery Statement indicates: 'In FY 2021/22, over 120 members of our internal supply chain, sourcing, internal manufacturing and product teams received either introductory or refresher training. The targeted training helps those who have close contact with our extended supply chain to be 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'. However, although the Company indicates some teams on topics related to human rights, it is not clear there is a generic human rights training course for the Company's employees. [Code of Conduct, 2022: burberryplc.com] & [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com] • Met: Trains relevant managers including procurement on HRs: The 2021/22 Modern Slavery Statement indicates: 'In FY 2021/22, over 120 members of our internal supply chain, sourcing, internal manufacturing and product teams received either introductory or refresher training. The targeted training helps those who have close contact with our extended supply chain to be familiar with the risk areas, likely indications of human rights abuses (including instances of modern

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>slavery) and possible actions to take if an incident of modern slavery is identified'. [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet HRs commitments: The Code of Conduct indicates that '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', however, the Code does not include all of the Human Rights Policy and no evidence was found that 'colleagues' includes suppliers. The 2021/22 Modern Slavery Statement indicates: 'Since FY 2016/2017, we have been training our supply chain partners, including vendors and key raw material suppliers, on understanding, identifying and managing modern slavery risks'. However, although the Company describes some specific trainings for suppliers on MS, no evidence found of general human rights training (policy commitments) conducted for suppliers. [Code of Conduct, 2022: burberryplc.com] & [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com] • Not Met: Discloses % suppliers trained: The 2021/22 Modern Slavery Statement indicates: 'In line with the commitment we made in FY 2020/21, this year's training has reached our key global product supply vendors and raw material suppliers covering 80% of our production. They have attended a three hour training session on modern slavery identification and management within their own operations and extended supply chain. All training participants have been tasked with the development of action plans to embed modern slavery awareness and prevention within their companies'. However, it is not clear the percentage of the supply chain which received a general human rights training [beyond MS]. [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com]
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company states that to ensure compliance with the Human Rights Policy, they assess human rights impacts and monitor labour conditions on a regular basis through their ethical trading program, which is delivered by an established global team of ethical trading experts. The Company also indicates that it conducts Human Rights Impact Assessments every two years of its supply chain operations, to ensure its approach remains effective and captures any emerging risks. This monitoring process is indicated to consist of announced or unannounced audits, worker interviews, document reviews and site tours. The 2022/23 Modern Slavery Statement indicates: 'During the FY 2022/23, we conducted 449 audits and 19 engagement activities across our finished goods and raw material supply chains. All our partners are provided with an approved corrective action plan that is closely monitored and supported by our teams, who work with the facilities on a continuous improvement plan'. However, it is unclear to what extent it monitors its own operations. [Annual Report 2021/22, 17/05/2022: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com] • Met: Discloses % of supply chain monitored: The 2022/23 Modern Slavery Statement indicates: 'During the FY 2022/23, we conducted 449 audits and 19 engagement activities across our finished goods and raw material supply chains'. It also indicates the total site production: 640. [2022-23 Modern Slavery Statement, 2023: burberryplc.com] • Not Met: Describes how workers are involved in monitoring: The Company indicates that it interviews workers, however, no evidence was found that they are an active part of the monitoring process. [Annual Report 2021/22, 17/05/2022: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process: The Ethical Trading Code of Conduct indicates: 'Business Associates are expected to identify and correct any activities that conflict with the standard of the Ethical Trading Code of Conduct via verifiable continual improvement programmes agreed by Burberry'. However, no further description of the corrective action process was found. This indicator looks for the standard process it has in place to implement corrective action plans where non-compliances are found as part of the monitoring process. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] • Not Met: Discloses findings and number of correction action processes: The 2022/23 Modern Slavery Statement indicates: 'This year, the main areas of non-conformance with our standards related to health & safety and working hours'.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			However, no further evidence found on the number of corrective action processes as a result of the monitoring. [2022-23 Modern Slavery Statement, 2023: burberryplc.com]
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs performance affects selection suppliers: The 2022/23 Modern Slavery Statement indicates discloses the onboarding processes for new raw material suppliers and new finished goods suppliers. In both cases, the fifth step of the system consists on suppliers 'approved only if no severe non-conformity is identified'. Also: 'All our supply chain partners and their supporting facilities are screened and assessed at the onboarding stage to identify any human rights and modern slavery risk'. [2022-23 Modern Slavery Statement, 2023: burberryplc.com] • Met: HRs performance affects continuation supplier relationships: The 2022/23 Modern Slavery Statement indicates: 'Where breaches of our standards and policies are identified, Burberry collaborates with local partners to find solutions to address non-compliance. Where improvements are not made within a given time or there is an unwillingness to address the issue, we may consider terminating a particular business relationship. The policy is designed to allow partners a reasonable amount of time to rectify non-compliances with the [Responsible Business Principles] Principles, to minimise any potential detrimental impact on workers' livelihoods, while always reserving the right to terminate contracts and take any other legal action possible, depending on the nature of the breach'. According to the same document, the Principles include de Human Rights Policy, among others. [Human Rights Policy, 03/2021: burberryplc.com] & [2022-23 Modern Slavery Statement, 2023: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Met: Works with suppliers to meet HRs requirements: The 2021/22 Modern Slavery Statement indicates: 'Since FY 2016/2017, we have been training our supply chain partners, including vendors and key raw material suppliers, on understanding, identifying and managing modern slavery risks. [...] In line with the commitment we made in FY 2020/21, this year's training has reached our key global product supply vendors and raw material suppliers covering 80% of our production. They have attended a three hour training session on modern slavery identification and management within their own operations and extended supply chain. All training participants have been tasked with the development of action plans to embed modern slavery awareness and prevention within their companies'. [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com]
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how workers and communities identified and engaged in the last two years: The Human Rights Impact Assessment indicates: 'The process involved mapping our own operations and those of our extended supply chain and assessing them in terms of their potential impact on key stakeholders, as set out in the Universal Declaration of Human Rights, including risks of forced labour. This enabled us to identify key stakeholder groups and the most salient potential human rights impacts in relation to them. Geographical, economic and social factors are taken into consideration in the assessment to determine the most salient human rights risks within our own operations and extended supply chain'. However, no description found of how it has engaged with affected stakeholders, including workers or local communities in its supply chain, in the last two years. [Human Rights Impact Assessment, N/A: burberryplc.com] • Not Met: Discloses stakeholders whose HRs may be affected: The company stated that: 'Our impact assessments highlighted our responsibilities towards four key stakeholder groups: our people, workers in our supply chain, our customers and communities', however, no specific information related to affected stakeholders was found. [Human Rights Impact Assessment, N/A: burberryplc.com] • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process of identifying risks in own operations: The Human Rights Policy indicates that 'to identify the principal human rights risks that might arise during our business activities, we have conducted a review of the operations and activities (direct and indirect) and the impacts they may have on human rights. This is known as Human Rights Impact Assessment'. It further notes, in its 2021/22 Annual Report, that 'We conduct a Human Rights Impact Assessment every two years as part of our broader Human Rights due diligence process to confirm potential areas of risk, capture any emerging risks in relation to new operations and projects, and review and develop mitigation plans as required. We have completed four impact assessments since 2014 and our latest assessment took place within FY 2020/21.' The document Impact Assessment adds: 'The process involved mapping our own operations and those of our extended supply chain and assessing them in terms of their potential impact on key stakeholders, as set out in the Universal Declaration of Human Rights, including risks of forced labour'. The 2022/23 Modern Slavery Statement adds 'If any labour or human rights risks are identified, the Vice President of Corporate Responsibility will report on such issues to the Ethics Committee as well as the Group's Risk Committee'. See also B.2.2. [Human Rights Policy, 03/2021: burberryplc.com] & [2022-23 Modern Slavery Statement, 2023: burberryplc.com] • Met: Describes process for identifying risks in business relationships: As above, the process includes both own operations and supply chain. [Annual Report 2021/22, 17/05/2022: burberryplc.com] & [2022-23 Modern Slavery Statement, 2023: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation: The Company indicates that Human Rights Impact Assessment is conducted every two years by an established global team and that it involves: 'conducting interviews with affected stakeholder groups, to better understand their needs and perceptions, get a real insight into the direct and indirect impacts of our business'. It does not provide further details nor discuss and how it involved internal or independent external human rights experts. The 2022/23 Modern Slavery Statement indicates: 'We have continued to collaborate with cross-industry groups, such as the Business Against Slavery Forum and the BSR Human Rights Working Group, to help target modern slavery. We continue to monitor and assess our response to new emerging risk areas, including those caused by the current global challenges. As a responsible business, Burberry is closely monitoring the increasing trends towards mandatory human rights and ethical trading due diligence legislation. We continue to raise awareness and support our supply chain partners' compliance with such standards'. However, the subindicator looks for a description of the global systems it has in place to identify its human rights risks and impacts on a regular basis across its activities involving consultation with affected stakeholders and internal or independent external human rights experts. No further evidence found, including affected stakeholders consulted, and details on whether experts were consulted as part of the identification process. [Human Rights Impact Assessment, N/A: burberryplc.com] & [2022-23 Modern Slavery Statement, 2023: burberryplc.com] • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes assessment process and discloses salient HRs risks: The Company notes that 'In 2014, we conducted a Human Rights Impact Assessment of our operations and activities and those of our extended supply chain, to identify and address potential risks. We reviewed this assessment in 2016, to capture emerging risks in relation to new operations and projects and to develop mitigation plans as required. Over the last year, to strengthen our efforts in this field even further, we have developed long term strategies for key themes arising from our 2018/19 Human Rights Impact Assessment, including migrant workers, income vulnerable workers, diversity and inclusion. We are now conducting interviews with affected stakeholder groups, to better understand their needs and perceptions, get a real insight into the direct and indirect impacts of our business and develop focused mitigation plans. The process involved mapping our own operations and those of our extended supply chain and assessing them in terms of their potential impact on

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>key stakeholders, as set out in the Universal Declaration of Human Rights, including risks of forced labour. This enabled us to identify key stakeholder groups and the most salient potential human rights impacts in relation to them. Geographical, economic and social factors are taken into consideration in the assessment to determine the most salient human rights risks within our own operations and extended supply chain.' [Human Rights Impact Assessment, N/A: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com]</p> <ul style="list-style-type: none"> • Met: Describes how process applies to supply chain: See above. [Human Rights Impact Assessment, N/A: burberryplc.com] • Met: Public disclosure of results of HRs risk assessment: The 2022/23 Modern Slavery Statement indicates: 'over the last two years we have implemented several mitigation action plans focused on the three highlighted areas from our FY 2020/21 [Human Rights Impact] assessment: 'Diversity, Equity and Inclusion; Worker voice; Modern Slavery'. [2022-23 Modern Slavery Statement, 2023: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Met: Describes how assessment involved affected stakeholders: The Company indicates in the Human Rights Impact Assessment document that it conducts interviews with affected stakeholder groups to: 'better understand their needs and perceptions, get a real insight into the direct and indirect impacts of our business and develop focused mitigation plans'. [Human Rights Impact Assessment, N/A: burberryplc.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company indicates that 'Mitigation plans have been developed and are being implemented and continually monitored. Risks and mitigation plans have been reviewed by Ergon, a specialist consultancy in this field, and discussed with Oxfam, a globally renowned aid and development charity', and that is committed to remedying any adverse impacts. However, no description of how these processes occur was found. [Human Rights Impact Assessment, N/A: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com] • Not Met: Describes how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HRs issue: The Company states that 'Mitigation plans have been developed and are being implemented and continually monitored. Risks and mitigation plans have been reviewed by Ergon, a specialist consultancy in this field, and discussed with Oxfam, a globally renowned aid and development charity. As an example, where we identified salient human rights risks within factories, we provide confidential, local NGO-run hotlines in relevant languages for workers in our supply chain. Currently, more than 10,000 workers are provided with improved access to remedy for human rights' concerns and confidential support, including advice and information on workers' rights and wellbeing. Workers are involved in participatory training on the use of the hotline. The effectiveness of the hotlines is continuously reviewed by internal and external stakeholders including workers. During FY 2017/18, Burberry sponsored hotlines received 588 calls and their resolutions have been monitored closely by our local Responsibility teams.' <p>It further notes that 'over the last two years we have implemented a number of mitigation action plans focused on migrant workers and women in our supply chain as we identified that these groups are disproportionately more vulnerable to modern slavery risks. Action plans included context specific interventions such as mapping recruitment journeys in identified hotspots, building worker voice mechanisms in these areas and working with experts to integrate gender sensitive processes and metrics into our programmes. We have expanded our Ethical Trading Programme to cover all distribution and fulfilment centres globally, including the evaluation of recruitment practices across these sites.' [Human Rights Impact Assessment, N/A: burberryplc.com] & [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all workers: The Human rights policy states that 'we have written grievance processes in place should any of our employees require formal remedy, and our people are entitled to the right and freedom of union membership and the right to collective bargaining. In addition, a confidential helpline "Burberry Confidential" is available to all our employees'. [Human Rights Policy, 03/2021: burberryplc.com] Score 2 • Met: Grievance mechanism available in appropriate languages and workers made aware: The Human Rights Policy indicates: 'In addition, a confidential helpline "Burberry Confidential" is available to all our employees. This is communicated to our employees on commencing employment with Burberry, as part of a comprehensive onboarding programme, is subject to frequent recommunication and details of the number to call are available on all employee identity cards as well as on our intranet site'. The Code of Conduct adds: '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'. [Human Rights Policy, 03/2021: burberryplc.com] & [Code of Conduct, 2022: burberryplc.com] • Met: Describes how workers in supply chain access grievance mechanism: The Company indicates it provides local NGO-run hotlines in relevant languages for workers in their supply chain, and states that the human rights policy expect its suppliers to 'We also require factories to provide a grievance mechanism that is communicated to, understood by and applied fairly to their employees'. [Human Rights Impact Assessment, N/A: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com] • Met: Expects suppliers to convey expectation to their suppliers: The Human Rights Policy states that 'Burberry Confidential is a helpline and web service managed by an independent company called 'InTouch', allowing employees to report, anonymously, any concerns relating to malpractice, with all cases treated in the strictest confidence. Burberry expects its Business Associates to have similar mechanisms in place to allow workers to anonymously raise concerns and grievances'. The Company prohibits unauthorised subcontracting [see B.1.4.b]. Also, see above. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com]
C.2	Grievance mechanism(s) for external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all external individuals and communities: The Company states that 'Burberry will ensure that issues and incidents reported by a local stakeholder are escalated to the relevant management and dealt with in a timely manner.' Furthermore 'communities' are included in the groups of stakeholders listed under the Grievance Mechanism section of the Company's human rights policy. [Local Stakeholder Engagement Policy 2021, 03/2021: burberryplc.com] & [Human Rights Policy, 03/2021: burberryplc.com] Score 2 • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The 2022/23 Modern Slavery Statement explains its worker grievance mechanisms: 'We seek to ensure that employees and workers in our supply chain have access to confidential support and advice. We provide grievance mechanisms for our employees, including a global helpline which is managed by an independent company. We also sponsor confidential hotlines run by NGOs for workers in our supply chain, which provide advice on workers' rights and wellbeing and confidential support'. The Code of Conduct adds: 'Colleagues can leave a recorded voice message in their local language by calling a country

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>specific telephone number. The telephone numbers are listed in the Burberry Confidential Policy available to colleagues on Burberry World'. However, it is not clear how the Company ensures all affected external stakeholders, including communities, at its own operations are made aware of it. [2022-23 Modern Slavery Statement, 2023: burberryplc.com] & [Code of Conduct, 2022: burberryplc.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how external individuals/communities access grievance mechanism: The Company states that 'In addition we are also committed to respecting the rights of the local communities surrounding our supply chain. However, no information was found on whether external stakeholders can report grievances against conduct of the Company's suppliers. [Human Rights Policy, 03/2021: burberryplc.com] • Not Met: Expects supplier to convey expectation to their suppliers
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism: The Company indicates that the effectiveness of hotlines is reviewed with internal and external stakeholders, including workers. However, no further details were found on what the process for this is. [Human Rights Policy, 03/2021: burberryplc.com] • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns: The Company indicates that 'any grievances made are logged and process, with outcomes formally recorded'. On grievances raised by external stakeholders, the Company states that 'Burberry will document communications, engagements and incidents involving local stakeholders for learning purposes. Burberry will investigate what is reported by a local stakeholder. Burberry will respond to the local stakeholder who reported the issue, where appropriate, with the actions that have been taken to resolve it.' The 2022/23 Modern Slavery Statement explains its worker grievance mechanisms: 'We seek to ensure that employees and workers in our supply chain have access to confidential support and advice. We provide grievance mechanisms for our employees, including a global helpline which is managed by an independent company. We also sponsor confidential hotlines run by NGOs for workers in our supply chain, which provide advice on workers' rights and wellbeing and confidential support'. The 2022/23 Annual Report contains further information on its Worker grievance mechanism. However, no details found in relation to timescales for addressing complaints and process for informing complainant. [Human Rights Policy, 03/2021: burberryplc.com] & [Local Stakeholder Engagement Policy 2021, 03/2021: burberryplc.com] • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that prohibits retaliation against anyone raising a complaint and will respect the rights of any other stakeholders raising human rights related concerns including human rights defenders. [Human Rights Policy, 03/2021: burberryplc.com] • Met: Describes practical measures to prevent retaliation: The Company indicates that Burberry Confidential is a helpline and web service managed by an independent company called 'InTouch' that allows employees to report, anonymously, any concerns relating to malpractice, and that it expects its suppliers to provide the same for its workers. [Human Rights Policy, 03/2021: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence: Regarding access to remedy, the Migrant Worker Policy indicates: 'Migrant workers should have access to judicial remedy and to credible grievance mechanisms, without fear of recrimination or dismissal'. However, no further evidence found explicitly indicating that it will not retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them as well as through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse and engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [Migrant Work Policy, 03/2021: burberryplc.com]</p> <ul style="list-style-type: none"> • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Human Rights Policy states: 'We prohibit retaliation against anyone raising a complaint and will respect the rights of any other stakeholders raising human rights related concerns including human rights defenders. We also expect all our Business Associates to respect the rights of human rights defenders'. However, it is not clear it has prohibition of retaliation which also covers individual stakeholders and communities at supplier level. [Human Rights Policy, 03/2021: burberryplc.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Company discloses that in FY 2019/2020 the sponsored hotlines received 598 enquiries whose resolution was overseen by the Company's responsibility team. However, it is not clear how many of the total enquiries were related to human rights concerns. [Company website, Human Rights Policy, N/A: burberryplc.com] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Company states in the Ethical Trading Code of Conduct, which applies to Business Associates including suppliers, that wages should always be enough to meet basic needs and to provide some discretionary income. The Company also states on its website that the living wage referred to in the Ethical Trading Code of Conduct should also be sufficient to pay for childcare and is: 'likely to include support for family members as defined in the local context'. However, it is not clear whether this definition of living wages always takes into account family members or dependents. The Company publishes a press release, in which it states: 'The In light of the rising cost of living, Burberry has brought forward the new UK real Living Wage pay rates as defined by the Living Wage Foundation by more than six months to support colleagues this winter. Burberry, which has been a UK real Living Wage employer since 2016, has implemented the increased rates from 1 October 2022, ahead of the deadline set by the Living Wage Foundation for accredited employers of 14 May 2023'. However, it seems to make reference to its own employees and this subindicator focuses on the supply chain. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] & [Ethical Trading webpage: burberryplc.com] • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: The 2022/23 Modern Slavery Statement indicates: 'Burberry employees who are responsible for supply chain partner relationships and sourcing have personal KPIs related to labour conditions, recognising the potential impact of fair purchasing practices on labour conditions throughout our supply chain'. Regarding internal teams training, it notes: 'The training also has a module on responsible buying practices, to explain the link between purchasing practices, potential impact on working conditions and risk of Human Rights violations. This training has helped embed respect for human rights and a policy of zero tolerance for modern slavery throughout the business'. However, although the Company provides responsible buying practices training and personal KPIs related to labour conditions, the methodology is looking for actual practices specifically adopted to avoid price or short notice requirements or other business considerations undermining human rights. No further details found. [2022-23 Modern Slavery Statement, 2023: burberryplc.com] • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices
D.2.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers including manufacturing sites: The Company indicates that it maps its supply chain, however, no information regarding product source was found and it is not clear if this process includes indirect suppliers. [Transparency in the supply chain and modern slavery statement, 12/05/2022: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on child labour in supplier codes and contracts: The Company states that it prohibits all forms of child labour in its supply chain and sets a policy regarding child labour. It also states that: 'Business Associates must have a suitable, fully functional and up-to-date age verification system in place that includes review of identification documents. Documentation stating each worker's age must be available at all times for review by Burberry and/or its authorised representatives, agents or professional advisors' and it presents a series of measures for remediation, including to support the Child Worker in returning to education and through a monthly stipend until legal working age, take measures to ensure that the Child Worker and their family suffers no hardship as a result, etc. [Child Labour and Young Worker Policy, 06/2021: burberryplc.com] • Met: Describes work with suppliers on eliminating child labour: The Company indicates that it will support the Business Associate in a review of its hiring practices to prevent the employment of Child Workers reoccurring. [Child Labour and Young Worker Policy, 06/2021: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on debt/fees in supplier codes and contracts: The Company indicates to Business Associates that no recruitment fees should be applied to the workers, including migrants and those hired locally. Other than that, it is stated that the Business Associate should not retain any Recruitment Fees from the worker's wage', or deduct money from the worker's wages including but not restricted to levies, deposits or guarantee monies, or compulsory savings schemes. The Company also recommends for its partners to eliminate the use of brokers, where it is common practice for recruitment fees and indicates that they should have clear contracts with any recruitment agency and it must pay the recruitment agency all legally allowed fees. [Migrant Work Policy, 03/2021: burberryplc.com] • Not Met: Describes work with suppliers on debt/fees for job seekers/workers: The Company indicates that it provides some recommendations so that the Associates will avoid fee situations, like avoiding working with recruitment agencies or working with a government registered recruitment agency where possible. And it describes that in 2020: 'where we identified a group of migrant workers paying fees during a complex recruitment journey, we started working with a local NGO, Issara Institute, and two suppliers who operate four facilities to build worker voice and remediate any fees paid by existing workers as well as workers that had since left their employment'. However, no description of how the Company works with its suppliers regularly to eliminate recruitment fees was found. [Migrant Work Policy, 03/2021: burberryplc.com] & [Modern Slavery Statement 2021/22, 12/05/2022: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states in the Migrant Worker Policy that its Business Associates, which includes suppliers, shall pay its migrant workers what they are due on time, regularly and directly. However, no statement comprising all workers was found. The Ethical Trading Code of Conduct states: 'Wages and benefits paid for a standard working week must meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. [...] Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded'. The 2022/23 Modern Slavery Statement indicates: 'All contractual agreements with our supply chain partners require compliance with our Code of Conduct and Responsible Business Principles, including our Ethical Trading Code of Conduct'. However, no evidence found that suppliers are required [contractually or through its supplier code] to pay in full and on time. [Migrant Work Policy, 03/2021: burberryplc.com] & [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirements on free movement in supplier codes and contracts: The Ethical Trading Code of Conduct states: 'Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice'. The 2022/23 Modern Slavery Statement indicates: 'All contractual agreements with our supply chain partners require compliance with our Code of Conduct and Responsible Business Principles, including our Ethical Trading Code of Conduct'. [2022-23 Modern Slavery Statement, 2023: burberryplc.com] & [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes working with suppliers on free movement of workers
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirements on FoA/CB in suppliers codes and contracts: The Ethical Trading Code of Conduct states: 'Workers, without distinction, have the right to join or form trade unions of their own choice and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on FoA/CB
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirements on H&S in supplier codes and contracts: The Company states in its Ethical Trading Code of Conduct that: 'workers shall receive regular and recorded health and safety training provided by the Business Associate, and such training shall be repeated for new or reassigned workers'; 'Access to clean toilet facilities and to potable (safe drinking) water and, if appropriate, clean sanitary facilities for food storage shall be provided; 'A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practical, the causes of hazards inherent in the working environment'; 'As a minimum, building (including structural, fire and electrical safety standards) must be compliant with local laws and regulations'. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on women's rights in contracts/codes with suppliers • Not Met: Describes work with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on working hours in codes/contracts with suppliers: The Company states in its Ethical Trading Code of Conduct that: 'Working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week', and that: 'The total hours worked in any 7 day period shall not exceed 60 hours (including overtime)'. However, the Company also indicates that the working hours can surpass 60 hours if all the following are met: it is allowed by national law; it is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. [Ethical Trading Code of Conduct, 06/2021: burberryplc.com] • Not Met: Describes work with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain • Not Met: Analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 23.68 out of 80 points scored in themes A-D has been applied to produce a score of 5.92 out of 20 points for theme E.

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