

RALPH LAUREN

Fair Treatment Policy

At Ralph Lauren Corporation ("Ralph Lauren")¹ we seek to respect universally accepted human rights for our employees. As such, we promote and maintain a safe, comfortable, productive and consciously inclusive environment that fosters mutual respect, professionalism, and cooperation regardless of race, ethnicity, sex, gender, sexual orientation, gender identity/expression, religion, age, disability and any other category protected by applicable law. The following policies and procedures are designed to achieve these goals through a fair and consistent approach.

We expect that our employees treat each other and anyone they interact with in our workplace with respect and dignity. Similarly, we expect those who come in contact with or provide a service in our workplace (e.g., an outside vendor, freelancer, model, consultant or customer) to do the same.

Ralph Lauren believes so strongly in this principle of fair treatment that Ralph Lauren established a function called Global People Practices ("GPP") and developed the *RL Hotline* to ensure employees have a safe and impartial place to bring their concerns.

Ralph Lauren conducts training on aspects of fair treatment periodically. This training is mandatory for all employees.

A. Open Communication Policy

Ralph Lauren believes that a policy of open communication is best for all concerned because all employees are responsible for maintaining and promoting our values as a company and protecting our vision of a respectful workplace where all employees feel welcome and enabled to do their best. We also believe that each employee should have the opportunity to make problems or concerns known. Therefore, when an employee wishes to express their problems, opinions, or suggestions, they will find an open door and an attentive listener. We also encourage all Ralph Lauren employees to be open and responsive to the comments or suggestions of other employees. Through our philosophy and procedures regarding employee intervention, we allow and encourage our employees to send direct and respectful messages about what is acceptable and expected behavior in our workplace. The basic concept is "See Something, Say Something". Specifically, if the employee feels safe and comfortable doing so, we encourage them to intervene directly and highlight the potentially inappropriate behavior.

It is the intention of this policy to handle employee problems as efficiently as possible. As outlined above, an employee experiencing an issue is encouraged to first discuss the matter directly with the coworker(s) and/or managers (s)/supervisor(s) involved. However, if the employee is not satisfied with the response from those individuals, or if the employee is unable or reluctant to speak directly with them, the employee may discuss the matter with a manager, supervisor, a member of People and Development

¹ This Fair Treatment Policy is the policy of the Ralph Lauren Corporation and each of its subsidiaries and affiliated companies around the world (each called, here, "Ralph Lauren"). Each Ralph Lauren company has adopted this policy as its own and imposes it directly on its own respective employees.

and/or GPP.

Misunderstandings, differences of opinion, or conflicts can arise in any organization. To ensure effective working relations, it is important that such matters be resolved before serious problems develop. The professionals in People and Development at Ralph Lauren are available to discuss problems or complaints, to clarify policy, or to provide suggestions. Should a situation persist that an employee finds of particular concern like discrimination, harassment, or retaliation, the situation should be handled through the procedure outlined in this Policy and Procedure.

B. Equal Employment Opportunity Policy

It is the policy of Ralph Lauren to base all employment-related decisions on principles of equal employment opportunity, in accordance with applicable law. In particular, it is the policy of Ralph Lauren to:

- recruit, hire, promote, assign, compensate and train highly qualified persons without regard to gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or any other basis protected by applicable law;
- administer all people related actions such as compensation, benefits, transfers, layoffs, discipline, termination, Ralph Lauren-sponsored training, education, and social and recreational programs without regard to gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or any other basis protected by applicable law;
- provide a reasonable accommodation to individuals with disabilities, unless it would cause an undue burden, and otherwise treat equally, qualified individuals with disabilities; and
- provide a workplace that is free of prohibited harassment, including sexual harassment.

Ralph Lauren expects each employee to support equal employment opportunities and to comply with all applicable laws prohibiting discrimination in employment. Violations of this policy may result in disciplinary action up to and including termination.

C. Harassment Prevention Policy

Ralph Lauren is committed to providing a work environment free of inappropriate or abusive behavior generally (e.g., belittling, screaming, microaggressions, threats, etc.) and of harassment. Specifically, Ralph Lauren maintains a strict policy prohibiting sexual harassment and harassment because of gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or any other basis protected by applicable law. All such harassment is prohibited. This policy not only protects and describes standards of behavior for employees, but also for job applicants, vendors, models, freelancers and consultants or anyone who comes in contact with or provides a service in our workplace (whether or not they are protected under applicable law).

SEXUAL HARASSMENT

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- submission to such conduct is made a term or condition of employment; or
- submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual; or
- such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment refers to various forms of offensive behaviors based on sex, behavior that is not welcome and is personally offensive, fails to respect the rights of others, lowers morale and, therefore, interferes with work effectiveness. Sexual harassment may take different forms and may involve members of the same sex. One specific form is the demand for sexual favors. Other forms of harassment include, but are not limited to:

- Verbal: Sexual innuendo, suggestive comments, jokes of a sexual nature, sexual proposition, threats of reprisal for making harassment reports or for turning down requests for sexual favors, or using one's position with the Company to seek sexual favors or otherwise act in a manner that is inappropriate or in violation of this policy.
- Non-Verbal: Dissemination of sexually suggestive objects, cartoons, posters, emails, texts, or pictures, graphic commentary about someone's body or dress, suggestive or insulting sounds, obscene gestures, leering or whistling.
- Physical: Unwanted physical contact, touching, pinching, brushing the body, assault or sexual activity, or impeding or blocking movements.
- Retaliation: Any retaliation for rebuffing any of the above or for making reports or threatening to report sexual harassment.

OTHER TYPES OF HARASSMENT

Prohibited harassment on the basis of gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or other categories protected by applicable law includes behavior similar to sexual harassment such as:

- Verbal conduct such as threats, epithets, derogatory comments, derogatory jokes or slurs;
- Visual conduct such as derogatory posters, photography, cartoons, drawings or gestures;
- Physical conduct such as assault, unwanted touching or blocking normal movement; and

- Retaliation for making harassment reports or for threatening to report harassment.

Whatever form it takes, harassment is insulting and demeaning to the recipient and will not be tolerated. All employees must comply with this policy and take appropriate measures to ensure that such conduct does not occur. As further outlined below, we require supervisors and managers to intervene and stop harassment if they observe it and report any suspected violations of this policy and encourage all other employees in our workplace to do the same. Failure to report may result in disciplinary action up to and including termination.

Due to the nature of Ralph Lauren's business, our workplace may expose employees to topics and materials (such as adult content) that they may find offensive. Although these topics and materials are a legitimate and an essential aspect of our creative business, we will try to accommodate individuals who find particular topics or materials offensive. In such situations, employees should notify management in accordance with this policy. Employees who in the course of performing their job duties encounter material they find offensive should also notify management in accordance with this policy.

Another form of harassment is Bullying. Bullying typically consists of acts or verbal comments that could psychologically or 'mentally' hurt or isolate a person in the workplace. Bullying can also involve unwelcomed touching or physical contact. Bullying usually involves repeated incidents or a pattern of behavior that is intended to intimidate, offend, degrade or humiliate a particular person or group of people. Bullying is contrary to our goals of promoting a safe, comfortable, productive and consciously inclusive environment. Any form of harassment or bullying that challenges the inclusivity of our workplace will not be tolerated and can result in disciplinary action up to and including termination of employment.

D. Individuals and Conduct Covered

This Policy applies to and protects all employees, job applicants, outside vendors, freelancers, models, consultants or customers who come in contact with or provide a service in our workplace and prohibits harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor, manager or by someone not directly connected to Ralph Lauren as referenced in this paragraph (e.g., an outside vendor, freelancer, model, consultant or customer).

Conduct prohibited by this policy is unacceptable in the workplace and in any setting outside the workplace, such as during business trips, business meetings as well as social events with other Ralph Lauren employees and/or those not directly connected to Ralph Lauren (e.g., an outside vendor, freelancer, model, consultant or customer).

E. No Retaliation

Ralph Lauren strictly prohibits retaliation against any person by another employee or by anyone representing Ralph Lauren for using the below complaint procedure, reporting discrimination or harassment, objecting to such conduct, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or

consider for hire, failure to give equal consideration in making employment decisions, intangible non-economic retaliation, failure to make employment recommendations impartially, adversely affecting working conditions in any manner or otherwise denying any employment benefit. Violations of this policy may result in disciplinary action up to and including termination.

F. Discrimination, Harassment and Retaliation Complaint and Investigation Procedure & Guiding Principles

Reporting Procedure

Ralph Lauren encourages the prompt reporting of complaints or concerns regardless of the identity of the alleged offender(s) so that rapid and constructive action can be taken. Any employee who believes that they have been subjected to prohibited harassment, discrimination or retaliation by a coworker, manager, supervisor, freelancer, client, outside vendor, or customer of Ralph Lauren, or who is aware of such harassment, discrimination or retaliation of others, should immediately report such conduct. While no fixed reporting period has been established, early reporting and intervention, by a bystander employee or others, have proven to be the most effective method of resolving actual or perceived incidents of harassment, discrimination and/or retaliation.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to inappropriate conduct from promptly and directly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued. In the event an employee declines to informally confront the alleged offender for any reason or, such informal, direct communication between individuals is ineffective the following steps should be taken promptly.

As a next step, an employee should discuss the issue with their immediate supervisor as soon as possible after the issue arises. In most cases, the supervisor will be able to resolve the matter. However, if the supervisor is the cause, the employee should speak to their People and Development Partner or GPP.

If the employee is not satisfied with the resolution at this point, or the supervisor advises the employee to do so, or the employee is unable or reluctant to speak directly with the immediate supervisor, the employee should meet with their People and Development Partner.

If the employee is not satisfied with the resolution at this point, the employee may discuss the issue with GPP, which can conduct investigations.

Regardless of the procedure above, the People and Development Department and/or GPP, can be consulted immediately or at any time in the process. GPP can also be directly or anonymously (depending on location) contacted via the *RL Hotline* based in the United States at (00)1-877-4POLORL. Alternatively, as another option you can also email GPP at: GlobalPeoplePractices@RalphLauren.com. Complaints can also be lodged on-line through www.ralphlauren.ethicspoint.com.

As stated above, we are all responsible for creating a comfortable atmosphere free of discrimination and harassment, sexual or otherwise. The following are the specific guidelines for Managers/Supervisors and for all our employees relating to the complaint process:

Manager and Supervisor Responsibility to Report

Each member of management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. Managers and Supervisors are also on notice and must be responsible to act immediately if they suspect or know that discrimination, harassment or retaliation may be occurring and **must** report that offense immediately to their People and Development Partner or GPP for guidance in handling these situations.

Employee Responsibility to Report

Employees who become aware of discriminatory, harassing or retaliatory conduct engaged in or suffered by a Ralph Lauren employee, and who prefer not to use Ralph Lauren's open communication policy or "intervene" as described above or have not received a satisfactory response as a result of using the open communication policy, should immediately report that information to their supervisor, their People and Development Representative and/or GPP.

Additionally, employees who believe that they are being discriminated against because other employees are receiving favored treatment in exchange for sexual favors or because of their gender, race, age, etc. must bring this to the attention of their People and Development Representative and/or GPP.²

Investigations

When an employee reports discrimination, harassment and/or retaliation as specified above, Ralph Lauren will engage in a prompt, thorough, and objective investigation appropriate to the circumstances. Investigations will be conducted and usually carried out by GPP (People and Development in International). The steps to be taken during the investigation cannot be fixed in advance but will vary depending on the nature of the allegations and the circumstances of the alleged offense. All investigations will be conducted in a discrete manner and confidentiality will be maintained throughout the investigative process to the extent practicable and consistent with Ralph Lauren's need to undertake an investigation. Information relating to any investigation, including information provided by an employee or the fact of an employee's participation in any investigation, will be kept confidential to the extent practicable.

Cooperation

Employees who fail to cooperate with an investigation may be terminated or subject to some other disciplinary action. Similarly, employees who refuse to implement remedial measures, obstruct the remedial efforts of other employees, and/or retaliate against complainants or witnesses may be terminated or subject to some other disciplinary action.

As stated above, this policy prohibits any form of retaliation against any employee for filing a bona fide complaint under this policy or for assisting in a complaint

² Aside from Ralph Lauren's internal complaint mechanism, employees may choose to pursue an external and similar complaint process at a governmental entity like the EEOC, or, for New York State employees, the NY State Division of Human Rights as well as, for NYC employees, the NYC Commission of Human Rights.

investigation. However, if, after investigating any complaint of harassment or discrimination, we determine that an employee has violated the policy, refused to participate in the investigation, or knowingly provided false or malicious information regarding the complaint, disciplinary action including immediate termination of employment may be taken against the individual who knowingly gave the false information.

Resolving the Complaint

Upon completion of the investigation, if necessary and supported by the facts of the investigation, remedial action will be taken against the individual who is the subject of a complaint. Remedial action may include oral or written counseling, referral to formal counseling or training, or disciplinary action including, but not limited to suspension, probation, or discharge from Ralph Lauren. If any further incident(s) of discrimination, harassment or retaliation occur, the incident(s) should be immediately reported.

At the conclusion of an investigation, high level results will be communicated to the Complainant in accordance with applicable law.

Disciplinary Action

After an appropriate investigation, any employee who is found to have violated this policy will be subject to disciplinary measures, and may also be subject to legal and financial liability. Disciplinary actions can range from a documented counseling letter up to and including termination of employment, depending on the evidence uncovered in the investigation and the nature and severity of the offense.

G. Conclusion

Ralph Lauren has developed this policy for our employees and anyone that interacts with our employees to ensure that all can work in an inclusive environment free from harassment, discrimination and retaliation. Ralph Lauren will make every reasonable effort to ensure that all concerned are familiar with these policies and aware that any complaint in violation of such policies will be investigated and resolved appropriately and in a timely manner.

Any employee who has any questions or concerns about these policies or who does not understand how to utilize the complaint procedure under these policies should contact their People and Development Partner and/or GPP.

This policy is part of Ralph Lauren's overall commitment to open communication, respect for, and promotion of, universally accepted human rights. Ralph Lauren encourages any employee with workplace concerns of any nature (including, but not limited to, any alleged discrimination, harassment and/or retaliation) to bring those concerns to the attention of People and Development or GPP.

This policy is effective as of January 22, 2020. Ralph Lauren policies will comply with local legislation and we reserve the right to update this policy at any time to comply with changes in the legislation and in our internal organization and procedures. The updated version will be communicated to employees.