

**GLOBAL HEALTH AND SAFETY POLICY**

**BURBERRY**

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PART 1: MANAGEMENT CONTROL AND SCOPE

Management control

This policy and associated management system will be reviewed periodically by the Global Health and Safety Team and reviewed annually by the Global Health and Safety Committee. Relevant sections of this policy will be made readily available to all relevant stakeholders.

A record of any review is outlined in the table below:

<b>Version</b>	<b>Date</b>	<b>Notes</b>	<b>Author / Group</b>
1.0	20 February 2021	Policy updated	John McGahan, Director of Health and Safety
1.1	25 February 2021	Policy approval	Edward Rash General Counsel
1.1	26 February 2021	Policy preview	Global Health and Safety Committee
1.1	24 March 2021	Statement of Intent and policy approval	Marco Gobbetti CEO

Scope

The scope of this policy covers all health and safety management arrangements for Burberry Group plc and its subsidiaries which will be referred to throughout this document as, 'Burberry'.

PART 2: STATEMENT OF INTENT

Burberry's global health and safety statement of intent is included on page 4.

# BURBERRY

## Global Health and Safety Policy - Statement of Intent

Burberry is committed to providing a safe and healthy environment for its employees, customers, suppliers and anyone else who works on or otherwise visits its stores, offices, factories or other premises worldwide. 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.

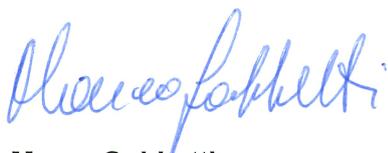
A safe, healthy and well-planned business environment is important to the long-term sustainable growth of our business. As a business, we acknowledge the collective and individual roles played by each employee in providing health and safety leadership within their areas of responsibility.

Our commitment to health and safety includes the following.

- Nominating a senior management representative to act as a Champion for health and safety.
- Having processes, procedures and governance arrangements in place to identify, evaluate and control significant health and safety risks which may arise throughout our business.
- A genuine desire to work in partnership with anyone we are engaged in business with, to ensure the highest standards of health and safety are maintained.
- Ensuring employees and contractors receive sufficient health and safety related training and information.
- Ensuring appropriate resources are made available for health and safety, including access to specialist advice and assistance.
- Ensuring that all health and safety incidents are promptly recorded, reported and investigated to, amongst other things, prevent recurrence.
- Setting annual health and safety objectives and targets, supported by a safety management system and programmes aimed at continually improving performance in this area and which will be subject to continual review.

We expect anyone working for, or with Burberry, to maintain the highest health and safety standards for themselves and others, and adhere to any instruction or policy provided.

Thank you for your support.

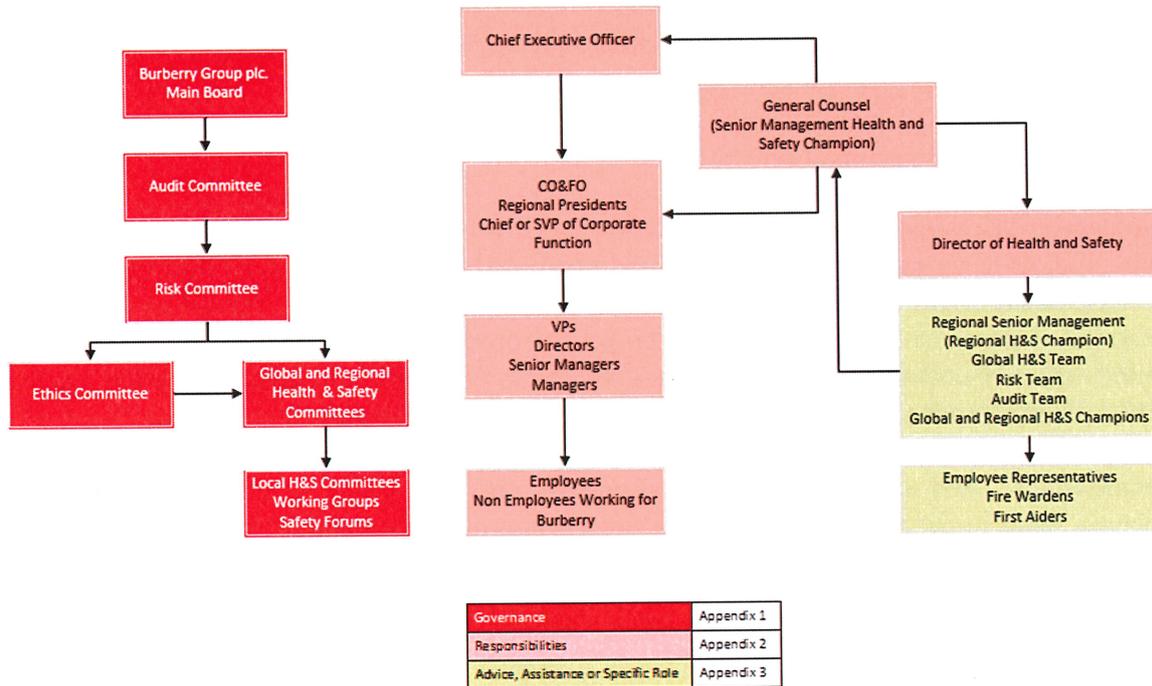


**Marco Gobbetti**  
Chief Executive Officer

**Date:** 24th March 2021

## PART 3: STRUCTURE, GOVERNANCE, RESPONSIBILITIES/ROLES, COMMUNICATION/CONSULTATION

Health and safety structure, governance, consultation, responsibility and specific roles are illustrated below:



### Communication and Consultation

Effective health and safety management requires communication and consultation at all levels. This will be via, but not limited to, the following.

- Local, regional or Global Health and Safety Committees or Working Groups
- Employee representatives
- Health and Safety champions
- Burberry Yammer (general and groups)
- Burberry World
- Burberry Confidential
- Notice boards (where appropriate)
- Location Manager meetings, conferences and corporate off-sites

Burberry encourages employees to become involved in health and safety matters locally and recognises the value of health and safety representatives. These voluntary roles can provide a local focal point for employee feedback regarding health and safety and can also contribute to decision making. At sites where a trade union is recognised and in certain countries there may be also be specific consultation requirements. In all cases, employee representatives will be provided with the resources (as reasonably necessary), time, training and information to fulfil their role.

## PART 4: POLICY NOTES AND ARRANGEMENTS

### Legal compliance and standards

The Global Health and Safety Team (as outlined on Appendix 3) will ensure that relevant global health and safety legislation is identified and integrated into the global Health and Safety Management System. This will be achieved through the maintenance of a legal register which will be subject to regular review by this team. Burberry will also work towards best practice throughout its global operations, adopting as a minimum the standards mandated by UK legislation where this is operationally practicable or local legislative requirements if higher. To facilitate this process, the Global Health and Safety Team in partnership with relevant stakeholders will maintain a range of minimum standards where this is deemed appropriate.

### **Health and safety management system**

To effectively discharge the statement of intent, the global Health and Safety Management System will be subject to on-going evaluation and improvement by the Global Health and Safety Team. The framework of the system will be aligned to the internationally recognised ISO 45001:2018 where this is practicable. The system will be proportionate to the health and safety risks within Burberry and will contain all relevant procedures, forms and guidance notes required to facilitate Burberry's adherence to the legal regulations and best practice referred to above.

Communication and implementation of the Health and Safety Management System will be achieved using innovative technologies and current internal systems, where possible.

This policy recognises that some Burberry locations may require a more detailed extension to certain sections of this policy due to their specific nature. Such sites include but are not limited to:

- Castleford (UK)
- Burberry Mill (UK)
- Burberry Manifattura (Italy)
- Global distribution centres (including Blyth and Vineland)

### **Hazard identification, risk assessment and determining controls**

Burberry is committed to the continued identification of significant hazards, the assessment of risk and the implementation of measures to protect both employees and those who may be affected by our business.

The responsibility for ensuring such assessments are completed, rests with those individuals organising an activity or in charge of a location on a daily basis. Arrangements for undertaking the assessment will be supported by the Global Health and Safety Team who will also provide training, advice and assistance as required.

### **Training**

Burberry will provide training where necessary, to ensure that health and safety responsibilities and standards at work are understood and maintained. The Global Health and Safety Team in partnership with internal stakeholders will ensure that an up-to-date training needs analysis is maintained and implemented, covering all global business activities. This will include, but will not be limited to the following:

- Executive leadership training
- Induction (e.g. corporate/regional offices and stores)
- General health and safety/fire safety training
- Health and Wellbeing training (e.g. mental health first aid and awareness)

- Workstation awareness training and assessment
- Specialist training (e.g. Fire Safety, First Aid, Permit to Work training)
- Construction safety

Training will be adapted to suit the intended audience and will aim to be engaging and innovative.

### **Health and safety incident reporting and management**

The Global Health and Safety Team in partnership with relevant stakeholders will ensure that appropriate systems and procedures are in place for health and safety incident reporting, escalation response, investigation, analysis and subsequent improvement. These procedures will include arrangements for those incidents which require notification to an external enforcement authority.

### **Advance preparation for emergencies**

Burberry has a mature business continuity programme with a formalised crisis management and emergency response structure in place with designated teams which are invoked either proactively to plan for an anticipated event or in response to a major incident or the impacts of a global pandemic. This structure includes a Group Incident Management Team (GIMT), Regional Incident Management Teams (RIMT) and Emergency Response Teams (ERT). The business continuity programme includes a series of crisis and emergency response simulations for each of these teams, with exercises undertaken on an annual basis, in accordance with the Burberry Business Continuity Policy.

### **Fire risk management**

In addition to the general fire risk management arrangements outlined within this policy and the partnership with the global architecture, asset and profit protection (APP) and operations teams, the Fire, Health and Safety Manager will work alongside the Global Health and Safety Team and relevant stakeholders to create and implement a global fire risk management strategy based on global best practice, where this is reasonably achievable in specific countries.

### **Event management**

All events run by or on behalf of Burberry shall be undertaken in a manner that gives advance consideration to the health and safety of attendees. The objective is to avoid potential adverse impacts on the health and safety of attendees and to safeguard Burberry's reputation. The Global Health and Safety Team, the Events/Production team and any Asset and Profit Protection representatives shall work in partnership to develop standards and arrangements to ensure best practice in this area for any event organised globally.

### **Construction projects**

In addition to country specific legal requirements to manage construction risk, the Architecture team and any team involved with construction related projects will ensure that health and safety is considered throughout the whole design and construction process by the relevant parties most suited to manage it to endeavour to achieve optimal health and safety through construction, subsequent use and on-going maintenance. Health and safety risks will be managed through the comprehensive Development Project Delivery Gateway Process in partnership with the Global Health and Safety Team. The Global Health and Safety Team will continue to proactively support and review health and safety considerations in other construction related projects.

## **Health and Wellbeing**

Burberry believes in providing an environment where people can bring their best selves to work, share how they feel and speak openly about their own health and wellbeing.

Burberry's Wellbeing activities help all colleagues create space in their lives to care for themselves and for each other, providing information, tools and resources to help them make small positive changes in their everyday lives and take responsibility for their own mental and physical health. Everyone has access to confidential counselling and support through our employee assistance programme.

## **Health and Safety Assurance**

An independent and robust health and safety assurance programme is in place and will continue to be developed and implemented by the General Counsel to demonstrate the effective management of health and safety and the relevant policies are being complied with.

The Global Health and Safety Team will manage a proactive assurance programme to target key risk locations and areas of compliance.

## HEALTH AND SAFETY GOVERNANCE

### **Burberry Group plc (Main Board)**

The Board endorses, supports and monitors the implementation of good health and safety practice across Burberry.

### **Audit Committee**

The Audit Committee is comprised of independent non-executive directors. This Committee monitors Burberry's policies and processes for identifying, assessing and managing business risks including the area of health and safety. The detailed terms of reference for this Committee are located [here](#).

### **Risk Committee**

The Risk Committee provides senior management oversight of health and safety management, together with any specific health and safety risks escalated from the Global Health and Safety Committee. The detailed terms of reference for this Committee are available from the company secretariat.

### **Global Health and Safety Committee**

See Appendix 1a for terms of reference.

### **Regional Health and Safety Committees**

See Appendix 1b for terms of reference.

### **Local Health and Safety Committees or working groups**

Local Health and Safety Committees or Working Groups can be created at either country or store/office levels, and can be chaired by Health and Safety Champions or other senior stakeholders. These Committees can discuss or implement any health and safety matters pertinent to a specific country or location. Advice and assistance can be provided by regional health and safety support. Significant matters can be escalated to the Regional (Executive) Health and Safety Champion.

## Global Health and Safety Committee (GHSC) – Terms of Reference

<b>SCOPE</b>	The GHSC is responsible for ensuring strategic global oversight of health and safety, to safeguard against direct and indirect loss in the context of Burberry's moral, reputational, legal and financial obligations.
<b>MEMBERSHIP</b>	<p>General Counsel (Chair)  Company Secretary (Deputy Chair)  Senior Vice President of Risk Management and Audit  Director of Health and Safety  Regional (Senior Management) Health and Safety Champions  Senior Representative (Human Resources)  Global Health and Safety Team Representatives  Third party auditor representative, and any employee representative (as required)</p> <p>At the request of the Chair, specialists will be nominated to attend specific meetings or be co-opted, where the business of the Agenda dictates that independent or other attendees' advice is required.</p>
<b>SECRETARY</b>	Global Health and Safety Team Co-ordinator
<b>DUTIES</b>	<p>The GHSC will:</p> <ul style="list-style-type: none"> <li>• Set a positive global climate which promotes health and safety leadership, awareness and consciousness throughout the business.</li> <li>• Oversee the strategic implementation of the global health and safety policy and related strategies or initiatives, providing the strategic leadership for the implementation via the regional Health and Safety Committees.</li> <li>• Receive, review and set targets relating to a range of global leading and lagging indicators of health and safety performance, and initiating strategic action on any findings.</li> <li>• Review, action or escalate any internal or external health and safety matter which is brought to the attention of the Committee, and ensure significant issues are addressed on a timely basis (this includes changes in health and safety legislation).</li> <li>• Receive, evaluate and formally acknowledge areas of global best practice relating to health and safety performance.</li> <li>• Monitor and evaluate the effectiveness of any health and safety training, communication.</li> <li>• Set up and monitor working parties as appropriate on specific issues.</li> </ul>
<b>MEETING FREQUENCY</b>	GHSC (every 6 months)
<b>INPUTS</b>	Papers and reporting from any member or attendees.
<b>OUTPUTS</b>	Minutes, Action and Report for: Ethics Committee / Risk Committee / Audit Committee.
<b>QUORUM</b>	Chair or Deputy Chair plus three other members.

## Regional Health and Safety Committees (RHSC) - Terms of Reference

<b>SCOPE</b>	The RHSC is responsible for regional health and safety matters and ensuring the operational implementation of health and safety, in particular any direction provided by the Global Health and Safety Committee (GHSC).
<b>MEMBERSHIP</b>	<p>Regional (Senior Management) Health and Safety Champions (Chair)          Senior Regional Representative (Deputy Chair)          Manager of Health and Safety          Regional Representative (Visual Merchandise)          Regional (Retail or Office) Health and Safety Champions          HR Representative (Regional)          Global Health and Safety Team Representative(s)          Third party auditor representative and any employee representative (as required)</p> <p>At the request of the Chair, specialists will be nominated to attend specific meetings or be co-opted, where the business of the Agenda dictates that independent or attendees' advice is required.</p>
<b>SECRETARY</b>	Regional administrative support.
<b>DUTIES</b>	<p>A RHSC will:</p> <ul style="list-style-type: none"> <li>• Set a positive global climate which promotes health and safety leadership, awareness and consciousness throughout the region.</li> <li>• Oversee the operational implementation of the global health and safety policy and related strategies or initiatives and direction from the GHSC.</li> <li>• Receive, review and continually improve regional leading and lagging indicators of health and safety performance (e.g. Audit actions).</li> <li>• Review, action or escalate any internal or external health and safety matter which is brought to the attention of the Committee, and ensure significant issues are addressed on a timely basis (this includes changes in health and safety legislation).</li> <li>• Receive, evaluate and formally acknowledge areas of both regional and global best practice relating to health and safety performance.</li> <li>• Monitor, evaluate and support regional health and safety training programmes.</li> <li>• Set up and monitor regional health and safety working parties as appropriate on specific issues.</li> </ul>
<b>MEETING FREQUENCY</b>	RHSC - after the GHSC (every 6 months)
<b>INPUTS</b>	<p>Any pertinent outcome or direction from the GHSC.          Any significant matters arising from local Health and Safety Committees or Working Groups.          Papers or reporting from any member or attendees.</p>
<b>OUTPUTS</b>	Minutes and Actions.
<b>QUORUM</b>	Chair or Deputy Chair plus three other members.

### GENERAL HEALTH AND SAFETY RESPONSIBILITIES

All employees and non-employees, working for or on behalf of Burberry have the following general responsibilities:

- Follow any health and safety policy, procedure or direction.
- Avoid conduct that would put at risk the health and safety of themselves and others.
- Attend or complete any health and safety training or instruction provided by Burberry.
- Report any health and safety incidents, defects in their work area or equipment, or any other hazards to their line manager, employee representative, Health and Safety Champion, Burberry confidential (helpline) or a member of the Global Health and Safety Team without delay.

The following roles have specific health and safety responsibilities

#### **Chief Executive Officer**

The Chief Executive Officer (CEO) has overall responsibility for health and safety management and provides visible leadership globally. This will include the provision of a global health and safety statement of intent which will be reviewed annually.

#### **Chief Operating and Financial Officer**

The Chief Operating and Financial Officer is nominated as chairman of the Risk Committee, providing executive oversight of significant health and safety matters globally.

#### **General Counsel**

Nominated as the Senior Management, Health and Safety Champion for the Group. This position will chair the Global Health and Safety Committee.

Ensure functional resources are in place to provide competent health and safety advice and assistance globally. Ensure that Burberry's corporate responsibility obligations relating to health and safety are met.

The General Counsel will also ensure, in partnership with the Global Health and Safety Team, that all workforce engagement strategies include relevant aspects of health and safety and that work related ill health metrics are captured and analysed where appropriate.

In partnership with the Director of Health and Safety, the General Counsel will develop and implement an assurance process for health and safety globally.

#### **Director of Health and Safety**

The Director of Health and Safety is responsible for leading the development and implementation of Burberry's global health and safety strategy, which includes the appointment, management and development of a Global Health and Safety Team.

#### **VP of Asset and Profit Protection & UK Corporate Workplace Services**

In partnership with the Director of Health and Safety, the VP of Asset and Profit Protection & UK Corporate Workplace Services will ensure that any areas of potential functional crossover, both

teams work in partnership. Such areas include, but are not limited to: personal safety, travel risk, fire safety and contractor management.

#### **Directors of Commercial Procurement**

In partnership with the Director of Health and Safety, this role will take all reasonable steps to ensure that the people and organisations (non-stock), with whom we work are aware of the health and safety standards that Burberry expect and will identify suppliers where further due diligence is required by the Health & Safety team

The roles and management grades below Have general health and safety responsibilities

#### **CO&FO / Regional President / Chief or SVP of Corporate function**

This senior management team will provide visual leadership and commitment to the continual improvement of health and safety throughout their area of responsibility. They will ensure any business decisions consider the impact on the health and safety of those affected.

#### **VP'S/Directors/Senior Managers/Managers**

In addition to providing visual leadership for health and safety, these appointments, to the extent they have control over any functional area or team, will ensure the following:

- That this and any other applicable health and safety policy, standard, procedure or directive is effectively implemented.
- Restrict or prevent the initiation of any process or activity that places Burberry employees or others at risk, seeking competent advice and assistance, when necessary.
- That employees or affected third parties receive appropriate health and safety related training, information, instruction or supervision as appropriate to their role.
- Ensure that any business plans, projects or initiatives consider health and safety implications.
- Take prompt action when notified of any health and safety matter.

#### **Where any employee is also responsible for the management of a store, office or other Burberry location the employee will ensure the following**

- Full access, cooperation and adequate time resources are allocated to any visiting company representative, third party audit or enforcing authority for reasons of health and safety.
- Any contractor arriving to a location to undertake work:
  - Is made aware of any site-specific risks and arrangements (including emergency procedures).
  - Is managed when on site, and that their activities will not affect the safety of employees or customers.
- Sufficient numbers of trained first aid personnel and equipment are maintained. Ensure all work related accidents, near misses and work related ill health are reported using the Sphera Safeguard system. Investigate all incidents, recording the outcome on the Sphera Safeguard system.

- All relevant activity or location risk assessments or checks are completed and implemented, as directed.
- Any health and safety action which is raised as a result of any audit or visit is implemented within the timeframe provided, notwithstanding any mitigating circumstances.
- As a minimum, the following fire safety measures must be in place:
  - Emergency evacuation procedures are developed, communicated and tested (every 6 months), with any remedial actions recorded and implemented. This will include maintaining sufficient numbers of trained evacuation marshals.
  - All employees or other relevant third parties are informed of their actions in the event of a fire.
  - Any means of escape is maintained and available at all times (Burberry has a zero tolerance to blocked or locked fire escapes).
  - Any fire detection, alarm system or firefighting equipment is maintained and fully operational at all times if under their control.
  - All steps necessary to prevent a fire occurring are taken.

***In partnership with regional support ensure:***

- Any contractor brought to a location to undertake work:
  - Is competent to undertake the work requested.
  - Is in possession of risk assessments and where necessary method statement covering the specific work undertaken.
  - High risk activities are controlled through Permit to Work procedures.
- An assessment of fire risk is undertaken with any significant outcome being implemented and communicated.

HEALTH AND SAFETY ADVICE, ASSISTANCE or SPECIFIC ROLES

**Regional (Senior Management) Health and Safety Champions**

This role will normally be the Regional VP, Director or other senior executive and will:

- Provide visible senior management leadership and support to health and safety throughout the region.
- Appoint Regional (Retail and Office) Health and Safety Champions in partnership with the regional Health and Safety Manager.
- Attend the GHSC and chair or lead the RHSC.
- Be the primary business lead for any immediate or significant health and safety matter, including appropriate escalations.

**Global Health and Safety Team**

This team led by the Director of Health and Safety, includes the following roles:

- Provision of competent advice, support and assistance throughout Burberry.
- Development and maintenance of a global health and safety management system.
- Review, analyse and assist with the continual improvement of leading and lagging health and safety performance.
- Act as a focal point for external regulators and enforcement activity.

This team will also work in partnership with those positions where the implementation of health and safety specifically forms part of their role (e.g. Operations, Workplace Services, Distribution and Property Managers).

**Regional Health and Safety Champions**

These roles will:

- Act as visible champions of operational health and safety matters within the scope of their day to day role.
- Attend regional or local Health and Safety Committees within their area of responsibility.
- Be the primary operational lead for health and safety consultation and the implementation of health and safety strategy, initiatives or actions.

**Representative of employee safety (or similar)**

Where these local roles have been established they can:

- Act as local focal points for employee health and safety feedback.
- Attend meetings, Committees and accompany inspections.
- Be provided with feedback on any significant change, proposals or outcome of an audit or risk assessment relating to health and safety.

