

Mulberry

Modern Slavery Policy

1. POLICY COMMITMENT

1.1 Modern slavery is an umbrella term that encompasses various crimes and violations of human rights where an individual is deprived of their freedom and are forced, threatened or deceived into situations of subjugation, degradation of identity and or self-worth, and control. This includes slavery, servitude, forced and compulsory labour, child labour and human trafficking. Mulberry is committed to acting ethically and with integrity in all its business areas, dealings and relationships around the world. We aim to use all reasonable endeavours to ensure that no modern slavery or human trafficking in any form is taking place in our supply chains or any part of our business and have implemented appropriate systems and controls. For a comprehensive outline of the processes, verification and audits in place, please refer to our annual Modern Slavery Statement pursuant to the Modern Slavery Act 2015 on our website.

2. PURPOSE

2.1 The purpose of this policy is to:

2.1.1 outline Mulberry's responsibilities, and the responsibilities of those working for and on our behalf, in assessing, observing, and upholding our zero-tolerance position on modern slavery; and

2.1.2 raise awareness and provide information to those working for and on our behalf on how to report concerns regarding modern slavery.

2.2 This policy applies to everyone working in or for Mulberry across all levels, in any capacity. This includes all employees (whether permanent, fixed-term or temporary), directors, senior managers, contractors and subcontractors, consultants, suppliers, officers, trainees, seconded staff, homeworkers, agency staff, volunteers, interns, agents, sponsors, external consultants, third-party representatives and any other person associated with us, or any of our subsidiaries globally.

3. YOUR RESPONSIBILITIES, DUE DILIGENCE AND HOW TO RAISE A CONCERN

3.1 You must sign a copy of this policy to show you have read, understood and comply with this policy and the responsibilities outlined.

3.2 If you are a supplier, contractor, consultant or other business partner to Mulberry, you must assess your business and supply chain for modern slavery risks and by signing this policy, you confirm that you and your organisation are compliant with the policy and are committed to ensuring there is no modern slavery taking place in your business or any part of your own supply chain.

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3.3 The prevention, detection and reporting of modern slavery, and reporting of concerns and suspicions, in any part of our business including in our subsidiaries and supply chains, is the responsibility of everyone working with and for us.

3.4 You must immediately report any occurrences, suspicions or concerns relative to modern slavery within our business, our supply chain, your business or your supply chain (if applicable) to:

3.4.1 your contact point at Mulberry if you are external to the business (contractor, supplier, or other business partner etc); or

3.4.2 your manager if you are an employee. Employees can utilise the Mulberry Whistleblowing policy which can be found in the Employee Handbook or on the Tree (Mulberry intranet) if you believe or suspect that a breach of this policy has occurred or may occur in the future.

3.5 If you are uncertain whether something is within the scope of this policy, you should seek advice from your manager or from the Legal Department.

3.6 Any reports under this policy will be taken extremely seriously and dealt with promptly in the appropriate manner. Mulberry encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

4. SUPPLY CHAINS AND SUPPLIER COMPLIANCE

4.1 We are committed to ensuring there is transparency within our own business and within our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 and Mulberry's Global Sourcing Principles. We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting process, we include specific prohibitions on any form of modern slavery, and continually assess and monitor risk.

4.2 To mitigate risk and increase transparency within our business and supply chain, all Mulberry employees are given a letter of engagement or contract setting out working conditions, hours of work and salary, and Mulberry conducts regular audits and a mixture of visits, third party auditing and self-assessments of all its major suppliers.

5. RESPONSIBILITY FOR THE POLICY

5.1 Management at all levels are responsible for ensuring individuals who report to them understand and comply with this policy.

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5.2 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all individuals and entities under Mulberry's control are compliant.

6. TRAINING AND COMMUNICATION

6.1 Training on modern slavery, which includes understanding what modern slavery is, how to identify it, and the risk our business faces from it, is provided to individuals who work for us.

6.2 Compliance with our zero-tolerance approach to modern slavery is a non-negotiable prerequisite of doing business with Mulberry and is agreed at the outset of any business relationship. Compliance checks will be enforced as appropriate on an ongoing basis.

7. BREACHES OF THIS POLICY

7.1 Any employee who breaches this policy could face disciplinary action, which could result in dismissal.

7.2 We may terminate our relationship with individuals and or organisation working with us or on our behalf if they breach this policy.

8. POLICY UPDATES

8.1 This policy does not form part of any employee's contract of employment and we may amend it at any time.

8.2 We will regularly renew and improve our policies and practices to ensure they remain effective in preventing modern slavery.

8.3 Any queries on this policy should be directed to the Legal Department.