

# BURBERRY

Modern Slavery Statement 2023/24

# MODERN SLAVERY ACT 2015 (UK), TRANSPARENCY IN SUPPLY CHAINS ACT 2010 (CALIFORNIA), FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT 2023 (CANADA) AND MODERN SLAVERY ACT 2018 (AUSTRALIA)

## 2023/24 BURBERRY GROUP PLC STATEMENT

At Burberry, we are committed to respecting and upholding human rights wherever we operate, and we do not tolerate any form of modern-day slavery in our business or supply chain

### About this statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015, the Canada Fighting Against Forced Labour And Child Labour In Supply Chains Act 2023, the Australian Modern Slavery Act 2018, and the California Transparency in Supply Chains Act of 2010 (SB 657). It sets out the steps we have taken during the financial year 2023/24 to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business. Burberry's definition of slavery and human trafficking is aligned to section 54 (12) of the Modern Slavery Act 2015.

This statement is also made on behalf of the following subsidiaries of Burberry Group plc (company number 3458224): Burberry Limited (company number 162636), Burberry (UK) Limited (company number 4288292), Burberry International Holdings Limited (company number 4251867), Burberry (España) Holdings Limited (company number 5265289), Thomas Burberry Holdings Limited (company number 3509143), Burberry Haymarket Limited (company number 4868493), Burberry Holdings Limited (company number 4251948), Burberry Canada Inc (company number 689541-7), Burberry Pacific Pty Ltd (company number 098 381 161), and Burberry London Limited (company number 4251951) and the actions and operations set out below are effective across the Burberry group.

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# INTRODUCTION

At Burberry, we are committed to doing well by doing right.

Under the banner of our Responsibility strategy, Burberry Beyond, we focus our efforts within four pillars, Product, Planet, People and Communities, that bring everything we do across our business, our supply chain and our communities together to create a better world for the next generation.

We have set 12 targets across the four pillars to embed responsible business practices, supported by our ongoing policy commitments. We have in place key metrics to measure and report on progress.

To positively impact people within and beyond our supply chain, we collaborate across our supply chain and sector to protect and nurture luxury craftsmanship skills and traditional techniques, and drive progress towards our diversity, equity and inclusion targets. Core to this agenda is respecting and upholding human rights, combatting the risk of modern slavery, and increasing transparency throughout our supply chain.

This is our ninth Modern Slavery Statement and provides an overview of the progress we have made over the past year in strengthening our systems to prevent modern slavery in our supply chain and operations and how we have addressed identified risks.

During this time, we have remained committed to supporting the people in our supply chain and our local communities.

In FY 2023/24, we have continued to implement action plans based on the findings of our human rights impact assessment, to focus on the key risk areas of our operations and our supply chain, including:

- Delving further into our extended supply chains and business operations to identify new potential modern slavery risks;
- Implementing a sourcing Country of Origin risk mapping tool that our product teams can utilise to support them when making sourcing decisions;
- Expanding and strengthening our training programmes for both internal teams and supply chain partners to build more effective prevention and mitigation actions; and
- Working with external experts such as the International Organisation for Migration (IOM), a United Nations-related agency, for the provision of introductory awareness-raising sessions on the protection of migrant workers in our global supply chain including responsible recruitment.

Our key areas of progress in FY 2023/24 include:

- Our Ethical Trading Programme covers 481 finished goods suppliers, including 447 in the EMEIA region and 34 in the APAC region. This covers 71% of our finished goods suppliers;
- Our Vendor Ownership Programme (VOP) – which helps our VOP partners to develop their own ethical trading audits across their supply chain – is now in place at 24 partners in the EMEIA region, covering approximately 52% of our EMEIA finished goods supply chain; and
- Our Worker Wellbeing Programme has reached approximately 11,650 workers in our supply chain.

We work with external experts to ensure our human rights due diligence model continues to evolve to meet emerging changes in legislation and we support our supply chain partners to ensure they are informed and compliant with such standards.



# OUR BUSINESS AND SUPPLY CHAIN

## About Burberry

Established in 1856, Burberry is a modern British luxury brand with a unique heritage and a longstanding commitment to quality, innovation and creativity. We design, source, make and sell carefully crafted products and are focused on delivering growth while playing a positive role in society. The wellbeing of our people, the people in our supply chain and the communities where we operate are at the heart of all our activities.

At Burberry, we have:

Over

**9,000**

employees

**132**

nationalities

Across

**33**

countries

**422**

stores

Over

**40**

Responsibility specialists

Revenues of

**£2.97bn**

in FY 2023/24

## Our operations

We manufacture our products at both Burberry-owned sites in the UK and Italy, and in partnership with a network of global suppliers.

We sell our products through our network of directly operated and franchised stores, online and via wholesale partners. Benefitting from their product and distribution expertise, we work with licensing partners for certain product categories such as eyewear and beauty.

Operating across the world, we contribute to local economies and support the communities around us. We add value to societies both directly and indirectly through our business operations and by partnering with NGOs on community programmes.



## Our product supply chain

We operate two Burberry-owned manufacturing sites in the UK (in Castleford and Keighley) and two in Italy (in Florence and Turin).

We also have a network of global suppliers. We have visibility of all finished goods suppliers, and we have targets to ensure that by FY 2029/30 all key raw materials are 100% traceable (back to country level as a minimum) and 100% of key raw materials in our products are certified or responsibly sourced (as defined by our Sustainable Raw Material Portfolio).

### Finished goods production sites FY 2023/24:



See our [Annual Report FY 2023/24](#) for further details on our traceability and raw material targets.

We have longstanding partnerships with many of our suppliers. We believe that strong relationships are key to ensuring continuous improvement in supply chain working conditions.

### Finished goods production sites – workforce profile FY 2023/24:



## Licensees

We license production of our beauty and eyewear products to Coty and Luxottica respectively. We work with both licensees to apply consistent standards which align with those adhered to across the rest of our supply chain.

[Coty's Human Rights Policy](#) sets out its commitment and approach to addressing human rights risks in its supply chain. Coty is a founding member of the Responsible Mica Initiative (RMI), a multi-stakeholder action group aiming to establish a 100% responsible Indian mica supply chain by the end of 2030. Since 2017, Coty has been a member of the Roundtable for Sustainable Palm Oil (RSPO) and is working towards the ambition for all Coty's palm oil purchases to be RSPO certified. For further details, see [Coty's Modern Slavery Statement](#).

Luxottica is part of the EssilorLuxottica Group, a global leader in the design, manufacture and distribution of ophthalmic lenses, frames and sunglasses. As part of the Eyes on Ethics pillar of its Eyes on the Planet sustainability programme, EssilorLuxottica has developed a set of ethics-related resources and tools that reflect its evolution as a unified Group as well as its values. In particular, EssilorLuxottica has several policies to address human rights and modern slavery risks, including its [Code of Ethics](#), its [Business Partners' Code of Conduct](#) and its [Modern Slavery Statement](#).

## Services and Goods Not For Resale

We also work with suppliers that support our broader business operations. These include logistics and waste contractors, and suppliers of Goods Not For Resale such as packaging and visual merchandising.

We require all our service providers and goods not for resale suppliers to comply with our Responsible Business Principles, including our Ethical Trading Code of Conduct. These are incorporated into our contractual agreements with partners and suppliers (see Policies section – p. 6). We also carry out ethical trade audits to monitor compliance with our Ethical Trading Code of Conduct (see Human rights due diligence section – p. 9).



# GOVERNANCE

We believe that respect for human rights is integral to being a responsible business. The prevention of forced, bonded and trafficked labour is a key element of Burberry's Responsible Business Principles.

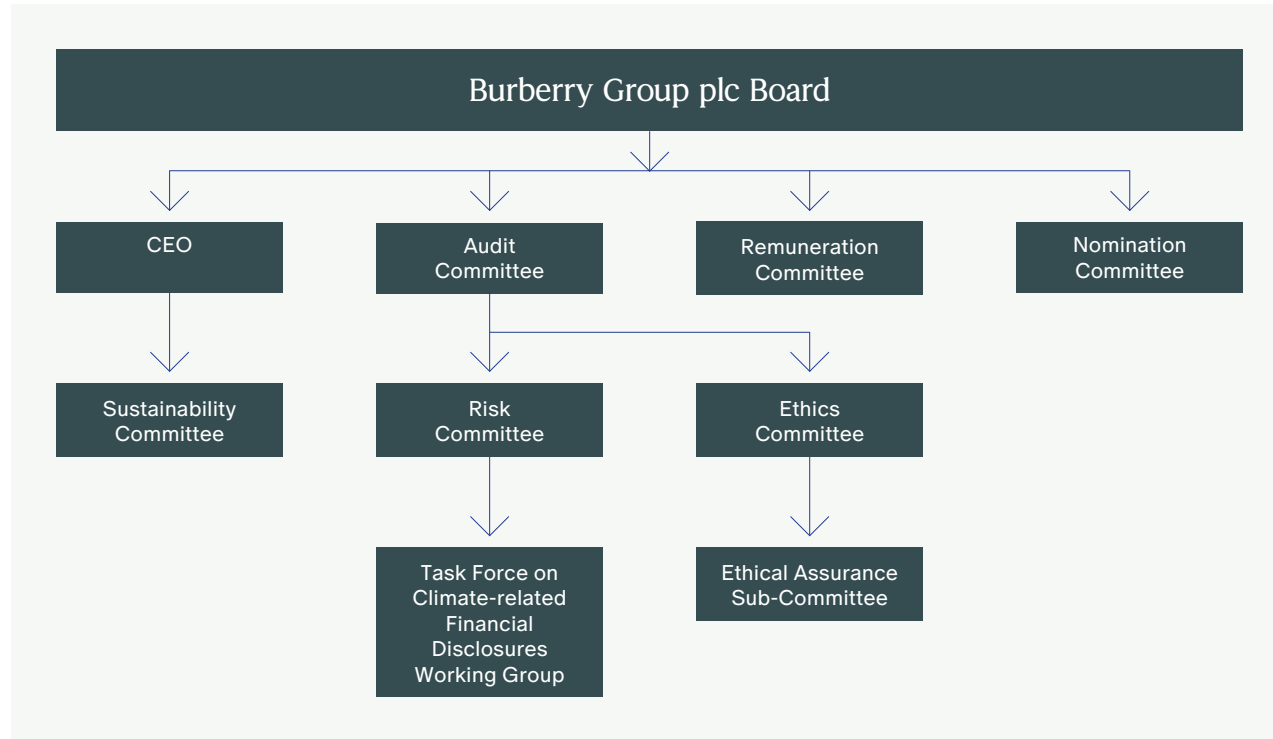
Policies relating to human rights are reviewed and approved by the Company's Ethics Committee which is chaired by the General Counsel. If any labour or human rights risks are identified, the Vice President of Corporate Responsibility will report on such issues to the Ethics Committee. The Ethics Committee reports into the Burberry Group plc Audit Committee, which is chaired by an independent Non-Executive Director.

As part of our approach to ensuring effective governance around human rights, our Internal Audit function completed an audit of our Ethical Trading Programme in FY 2023/24, which was shared with the Ethics Committee. As a result, we have updated our processes to ensure enhanced due diligence when issues arise, a more collaborative approach with our supply chain partners and increased accountability from senior leaders within our supply chain. All this progress is agreed with Internal Audit and then reported back to the Ethics Committee.

This year the Ethics Committee has established the Ethical Assurance Sub-Committee to address any potential or actual human rights impacts as they arise and enable decisions to be taken more quickly.

Additionally, our sustainability strategies are reviewed by the Sustainability Committee which is chaired by the CEO. The governance structure chart (see p. 5) outlines the reporting lines of each of the committees.

## Burberry governance structure



## Working with others

We aim to collaborate and work in partnership with others to identify and manage human rights and modern slavery risks. We participate in several cross-industry groups and partnerships including:

- Business for Social Responsibility (BSR) Human Rights Working Group. We became members of BSR in 2022 and joined their Human Rights Working Group, which was established to help companies implement the UN's Guiding Principles on Business and Human Rights (UNGPs). It supports companies to share best practices, challenges and experiences implementing the UNGPs and to learn about both foundational human rights approaches and emerging issues
- We are a longstanding member of the UN Global Compact, a United Nations pact concentrated on sustainable and socially responsible business, with four key focus areas of human rights, labour practices, environment and anti-corruption
- We are committed to supporting the UN's Sustainable Development Goals (SDGs) and report on how we contribute to the SDGs in our [Responsibility Data Appendix FY 2023/24](#)



# POLICIES

The Responsible Business Principles (the ‘Principles’) have been developed in line with our commitments and experience over many years.

They have been informed by our longstanding membership of the United Nations’ Global Compact, and are underpinned by the ETI Base Code, International Bill of Human Rights, and the Fundamental Conventions of the International Labour Organization. We review the Principles against latest best practice guidelines and emerging regulatory requirements and update them where needed. We seek to apply the Principles to all our business associates, which include, but are not limited to, raw material suppliers, finished goods suppliers, subcontractors, supporting facilities, non-stock suppliers, construction contractors, licensees and franchisees.

The Principles include the Burberry Code of Ethical Business Principles, Anti-Bribery and Anti-Corruption Policy and Global Environmental Policy, and the following five policies:

- [Burberry Human Rights Policy](#)
- [Burberry Ethical Trading Code of Conduct](#)
- [Burberry Migrant Worker Policy](#)
- [Burberry Child Labour and Young Worker Policy](#)
- [Burberry Partner Non-Compliance Policy](#)



# OUR STRATEGIC APPROACH

## Risk assessment

We take a risk-based approach to managing human rights and modern slavery risks. During FY 2023/24 we refined our human rights strategic approach for our wider supply chain. The approach is made up of four pillars and supports our commitments to fully embed human rights into our business practices.



### Integrate

Commit and embed human rights into business practices



### Enhance

Enhance labour conditions for the workers in our supply chains



### Transform

Create positive impacts and drive efforts to address endemic human rights issues



### Engage

Engage with key stakeholders to advocate for sustainable change across the industry

Every two years, we conduct a human rights impact assessment of our operations and activities and those of our extended supply chain (see p. 8).

We also assess and address human rights and modern slavery risks within our supply chain through our Ethical Trading Programme. We conduct a risk-based analysis of new suppliers prior to procurement and conduct ethical trading audits where risks are identified (see Human rights due diligence section – p. 9).

## Assessing our human rights impact

We conduct regular human rights impact assessments (HRIA) of our operations and activities and those of our extended supply chain. If a forced labour risk is identified, ethical trading assessments are conducted by our internal teams or by a local NGO, where local expertise is needed, to identify any labour rights issues and remediation required.

We have implemented this process since 2014 and during FY 2023/24 worked closely with an external consultant to enhance our HRIA methodology, to ensure it remains comprehensive and continues to provide us with a material assessment of our operational human rights footprint.

Our latest impact assessment took place in Q4 of FY 2022/23, where in addition to our standard assessment, we conducted a supplementary analysis of where migrant workers' human rights may be impacted. This assessment included considerations related to the UNGA's recognition of the Right to a clean, healthy and sustainable environment, under international law.

These assessments identified the following key areas where human rights violations are more likely to be identified across our supply chain. These are:

- Working and living conditions, including access to health services
- Worker voice – specific to providing remedy
- Diversity, equity and inclusion
- Modern slavery

Over the last year we have implemented several mitigation actions focused on these areas. Please see the following sections for further details, Worker Wellbeing Programme (p. 12), Health Programme (p. 12), Worker grievance mechanisms (p. 13), Training and resources (p. 14) and Human rights due diligence (p. 9).

As we move into the next year, we will continue to build out our action plans to drive positive impact and to further address these risk areas, including:

- Updating our Human Rights and Migrant Worker Policies, to continue to align with existing guidance
- Expanding Burberry sponsored hotlines, to provide more workers with access to these confidential channels
- Conducting supply chain data assessments, to support our commitment to fair wages and fair work
- Conducting country-specific risk assessments with the support of external experts to address our salient human rights impacts

## Traceability

We are targeting full traceability of all key raw materials by FY 2029/30. Through our traceability programme, we will be able to assess and manage the social impacts of raw material sourcing more closely, as well as meet evolving consumer and regulatory needs.

We have implemented a successful traceability pilot project in FY 2022/23 for cotton, wool and synthetics with key suppliers, using a third-party traceability tool to track these fibres back to the country of origin. We are now scaling this initiative to include other fibre types and will continue to accelerate this work. See our [Annual Report FY 2023/24](#) for further details of our progress on raw material traceability.



# HUMAN RIGHTS DUE DILIGENCE

Our human rights due diligence encompasses and integrates all the activities we put in place to identify and manage social risks in our product supply chains.

We review our due diligence model regularly to ensure it considers the expectations of our external stakeholders such as international regulations, consumers, investors and governments.

This year, we have undertaken a robust review of our due diligence model with the support of external experts. This included a gap assessment, which has allowed us to develop an enhanced human rights due diligence approach, which has been validated by external consultants and will be implemented over the next year and beyond.

The enhanced due diligence methodology will ensure a risk-driven approach across risk assessment, prevention and remediation activities and support ongoing compliance with upcoming regulations regarding protection for human rights.

Human rights due diligence dictates the overarching set of activities we deem appropriate to:

- Assess the risk, in combination with the human rights impact assessment and via supply chain partner onboarding
- Mitigate the risk, via our Ethical Trading Programme
- Prevent the risk, with capacity-building activities and risk-focused awareness-raising sessions deployed by international entities (such as IOM) designed to prevent serious violations of human and labour rights of migrant workers across our product supply chain
- Listen to and act on workers' voice, with specific grievance mechanisms managed by international hotline service providers



## Supply chain partner onboarding

All our supply chain partners are screened and assessed at the onboarding stage to identify any human rights and modern slavery risks. We require all our partners to acknowledge and sign the Principles to ensure mutual agreement that any form of modern slavery, included forced, bonded or involuntary prison labour, is not permitted under any circumstances.

Adherence to the Principles is included in our contracts with supply chain partners. Before any new supply chain partner is approved, we assess them for any indicators of forced, bonded or trafficked labour in line with our social compliance procedures. For raw material suppliers, if during this risk assessment a vulnerable workforce or geographical location risk is identified, a full audit will be completed, and the results and the remediation plans (if any) will be evaluated before a decision on providing approval is made. Should remediation be unsuccessful at any stage and a supplier not meet our strict criteria, we will not pursue any working relationship with them.

### Raw material supplier onboarding process:



### Finished goods supplier onboarding process:



## Assessment of our supply chain

Based on the findings of the assessment conducted at the onboarding stage, a new finished goods supplier will either be approved for production or will require a full on-site Ethical Trading Audit. We have a team of ethical trading experts within our Responsibility team who carry out ethical audits across our supply chain and are supported by interpreters and cultural facilitators where required. External accredited auditing agencies are also appointed to conduct audits.

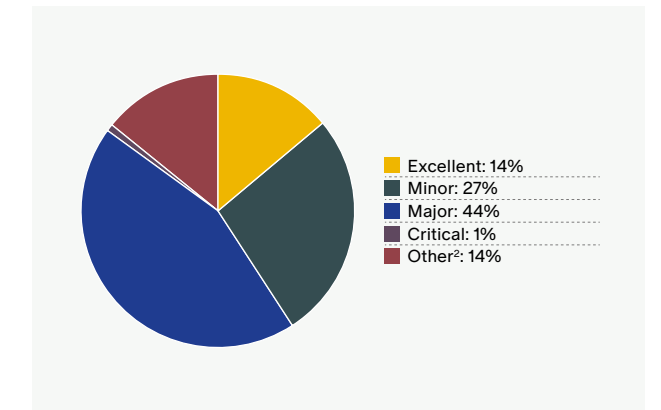
Audits, announced or unannounced, consist of worker interviews, document reviews and site tours, and are conducted ahead of onboarding based on the social risk associated with the partner. The audit gradings range from Excellent where no issues have been identified, then Minor, Major, Critical and Business Critical where serious findings have been identified. Our Critical procedure regulates instances of Critical and/or Business Critical partners, including those who have not engaged in adequate disclosure or been onboarded (i.e. unauthorised subcontractors). According to our Critical procedure, both a Business Critical and a Critical partner would be rejected at onboarding, unless, in the latter case, immediate commitment is shown to address limited impactful non-conformities within a suitable timeframe.

All audited facilities receive a corrective action plan, which our Responsibility team works on with the facilities to monitor and support implementation. Action plans will focus on improvements to systems to prevent and/or remediate modern slavery, as well as better management of both human rights and health and safety risks.

During our regular monitoring activities, we aim to ensure a partner's ongoing compliance and continuous improvement against an agreed corrective action plan, providing support and guidance where needed. The frequency and type of audits depends on the previous audit grading and the risk associated with the partner. Based on that, we aim to audit our partners no less than once every 36 months, in cases of low risk and previous Excellent gradings.

We have a target that all our material<sup>1</sup> finished goods suppliers are audited against our Ethical Trading standards, and 71% of our finished goods suppliers were either audited or remained in scope of their most recent audit during FY 2023/24. This year we conducted 495 on-site audits, 100 desktop assessments and 106 induction trainings across both our finished goods and raw material supply chains. During FY 2023/24, only 1% of our finished goods suppliers were identified to have Critical or Business Critical findings and managed in alignment with our Critical procedure.

### Breakdown of finished goods supply chain partners by Ethical Trading performance



This year, the main areas of non-conformance with our standards across all audits conducted were related to health & safety<sup>3</sup> and working hours, and we will continue to work with our partners to identify the root cause of these issues and implement actions to address and prevent them.

1. Material: meaning the top 80% of finished goods suppliers by volume and value or any finished goods supplier or material supplier who is deemed in need of a social audit (this is decided based on our Social Risk matrix).  
 2. Other grading refers to Accepted, Pre-approved, Audit to be confirmed.  
 3. For example, inadequate training around health and safety, or inadequate fire safety management.



Our Ethical Trading audit programme primarily aims at addressing and preventing modern slavery risks across our supply chain. To guide our partners, we raise their awareness through our onboarding process and training programmes of associated risks of modern slavery at subcontractors and support their remediation efforts during a continuous improvement journey.

Our audit programme aims to address the risk posed by unauthorised subcontracting. As a global organisation, we have a zero-tolerance policy to prevent unauthorised subcontracting across all levels of our finished goods supply chain. Similarly, our partners cascade this to all of their partnerships and in some cases implement digital tracking systems to prevent outsourcing.

We have also continued to extend the scope of our Ethical Trading Programme to cover logistics and distribution centres, service providers and suppliers of Goods Not For Resale (GNFR), where we identify risks based on location, worker demographic or processes carried out at the facility. In FY 2023/24, we carried out ethical audits at suppliers of packaging and some service providers, and we will continue to enhance our risk mitigation in this area of our supply chain.

## Remediation

Our approach to remediation follows the ‘Employer Pays Principle<sup>4</sup>’ whereby the fees that were paid by workers across a recruitment journey, if any, will be reimbursed to said workers to ensure responsible recruitment across our supply chain. As part of this remediation process, we work with local partners to ensure we take a balanced approach to remediation.

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### Remediation case study

This year, we identified a group of migrant workers paying fees during a complex recruitment journey, amongst a small number of our suppliers. We immediately started working with a local NGO, and the four suppliers who had recently hired new migrant workers.

The NGO conducted assessments at each supplier facility, including interviewing workers to understand their recruitment journeys and to formulate a timely remediation plan. Remediation work has commenced, with all workers having received reimbursement for any fees paid. Receipt of payment has been validated by the workers and the local NGO.

We continue working closely with our supply chain partners and the local NGO, to ensure they continue to follow ethical recruitment practices and conduct the necessary due diligence. This includes supporting our supply chain partners in developing sufficient policies and procedures for future ethical recruitment of migrant workers, as well as continued due diligence such as on-site audits.

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## Additional supply chain activities

We understand that utilising an auditing approach to due diligence alone does not always lead to sustainable change. Therefore, we have implemented several additional programmes to support our partners’ capabilities to identify, manage and prevent social risks within their own facilities and extended supply chains.

### Ethical trading capacity building programme

In order to promote ethical audits throughout the tiers of our supply chain, we continue to extend our capacity building programme, named the Vendor Ownership Programme (VOP). This programme provides our VOP partners in the EMEIA region with support to develop and run their own programme of ethical audits within their supply chains.

Thanks to our partners’ continued engagement, along with extensive support and training, the VOP is a key pillar for ensuring our ethical standards are met in our supply chain. By developing a collaborative and mutually supportive approach with our VOP partners, we have achieved a hugely positive impact in identifying, assessing, preventing, and mitigating risks within our supply chain. Regular audits focused on human rights as well as health and safety are conducted both by our VOP partners’ appointed resources and our internal Responsibility team, against the Ethical Trading Code of Conduct. Based on the results of the audit, improvement action plans are developed, and shared with our partners’ supply chain, who work on bridging the gaps identified.

We ensure a continuous in-depth analysis and investigation of supply chain-related issues through training sessions, which we facilitate and are delivered both by the Responsibility team and external consultants. This year training topics were primarily regarding our new due diligence model that aligns to upcoming EU human rights legislation, and how our VOP partners can ensure their own due diligence processes are updated to meet these new requirements.

To support those involved in the programme, we held two VOP community days this year. This encourages participants to share best practices as well as allowing for effective training to be carried out in person.

100% of VOP partners established a governance system and ethical internal committee to ensure the due diligence process is embedded into their procedure.

We are committed to ensuring the programme remains effective and to keep engaging new partners in the programme. During FY 2023/24 we engaged three new partners into the programme across our EMEIA supply chain.

The programme is now in place at 24 suppliers, reaching over 20,500 workers across 310 subcontractors, covering 52% of our EMEIA product supply chain.

4. Employer Pays Principle: No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer (Institute for Human Rights and Business).

## Worker Wellbeing Programme

We aim to engage our supply chain partners in programmes that support the wellbeing of workers across our supply chain. In FY 2023/24, nine finished goods suppliers participated in our Worker Wellbeing Programme, which we first launched in 2018.

This has covered approximately 11,650 workers in our supply chain during FY 2023/24. By focusing on worker wellbeing, we aim to help our suppliers to improve employee satisfaction and attract and retain talent.

The programme includes:

- Training sessions and workshops for site managers to increase knowledge about worker wellbeing.
- A survey to measure worker wellbeing, which was originally developed in partnership with Oxfam Business Advisory Service and adapted over time. This covers topics such as happiness at work, job satisfaction, personal and professional development, and physical wellbeing.
- One-to-one meetings are held with the supply chain partners to share the anonymised results, to help them identify their strengths according to their workforce, and their opportunities for improvement. We also give them a wellbeing performance grading that can be tracked year on year throughout their participation in the programme.
- A site-specific action plan, based on the survey results, which is developed in consultation with the Responsibility team and the workers. The action plan aims to address the most impactful wellbeing areas required for improvement, and its implementation is closely monitored by the Responsibility team.

Our goal is to ensure continuous improvement of wellbeing performance across our suppliers, and this year 100% of our participating suppliers achieved Good<sup>5</sup> performance.

This year we focused on enhancing the programme and are currently working with Oxfam Business Advisory Service and an external data platform to ensure the programme remains impactful and can reach more of our supply chain workers.

Next year we plan to continue to extend the programme to cover more supply chain partners and will encourage participants to cascade the project across their own supply chain where applicable.

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### Enhancing worker wellbeing case study

This year one of our UK partners responsible for producing some of our most iconic products, our cashmere soft accessories, joined our Worker Wellbeing Programme. It conducted our wellbeing survey for its employees and had extremely high engagement rates, with 80% of the workforce actively participating.

As a result, it was able to show positive results, with scores ranging from 72%-86% for all six categories of the survey: workload, work-life balance, reward, personal and professional development, relationship at work, and premises.

The survey results will support our partner in implementing targeted actions to address some of the areas in which it had lower scores and ensure it knows where it is currently succeeding with its wellbeing-related efforts.

Its action plan in response to the results of the survey includes initiatives such as raising better awareness of its Employee Support Portal, implementing new training with line managers and communication skills at the forefront, and maintaining existing extra benefits such as support packages for unforeseen events.

To ensure ongoing evaluation and refinement of the improvement journey, the partner will continue to be engaged in the Worker Wellbeing Programme to enhance employee wellbeing and organisational development.

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## Health Programme

We are committed to supporting workers' access to health education and services. We established our Health Programme in 2015 and since then have provided more than 4,000 supply chain workers with tailored health training. This year over 830 supply chain workers participated in the programme and received approximately three hours training each.

To ensure the training is effective and relevant for the workers participating, we collaborate with the supply chain partner and the medical practitioner conducting the training, to identify what health topics should be covered. The four broad training modules are women's health, men's health, general health and mental health, and they include topics such as reproductive health, cancer awareness and nutrition.

We also conduct a pre-training survey to understand the initial knowledge level of the attendees, which is then repeated after the training, to measure the effectiveness of the training and to continue to improve knowledge and awareness year on year.

We are committed to extending our health training programme to continue to provide health consultations and awareness-raising sessions. In FY 2024/25, we plan to offer this to our supply chain partners in Thailand and Vietnam, with the support of local NGOs and organisations.

5. Scale of ratings starting from the lowest is Unsatisfactory, Acceptable, Good and Excellent.



## Homeworkers

Homeworkers are highly skilled individuals who are integral to fashion supply chains. This method of working helps to support a worker's family life while also maintaining an income.

An area of our supply chain with a small but significant number of homeworkers is Japan, where workers have supported demand since the 1970s. One example is in shoemaking, where leather cutting, skiving, upper-making, and bottoming processes all have different specialists using machines and chemicals in the workshops in their homes.

We are committed to raising awareness on home workplace safety and the wellbeing of these workers. We are supporting our supply chain partners in conducting homeworker visits and implementing a newly developed homeworker checklist to ensure safe working conditions are observed.

## Living wage

We are committed to the promotion and adoption of a living wage in our own operations and supply chain and are proud to become the first luxury retailer and manufacturer to achieve accreditation as a UK Living Wage Employer. In 2016, we joined the Global Living Wage Initiative, which works to address in-work poverty across all sectors and multiple geographies, as part of a unified, global approach with multi-stakeholder participation.

Several of our UK suppliers are Living Wage Employers, including our longest-standing partner Johnston's of Elgin, manufacturers of our Heritage cashmere scarves.

In April 2023, a Living Wage Charter was officially launched in Hong Kong by Oxfam HK, with our participation. As one of the accredited Living Wage Employers listed under the Charter, we work closely with Oxfam HK to raise awareness about the importance of a living wage and to celebrate organisations that prioritise fair wages for their workers.

## 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, wellbeing and confidential support.

During FY 2023/24 we successfully extended these hotlines to five new factories, now reaching approximately 33,350 workers in our supply chain, which equates to approximately 79% of our APAC finished goods supply chain workers. New suppliers will be reviewed and invited to join the hotline programme on an annual basis.

During FY 2023/24, our sponsored hotlines received 473 calls. These included 22 complaints, 447 consulting requests and four psychological support requests. Approximately 77% of all complaint calls have been addressed and responded to, with the remaining cases still being addressed by the suppliers with the support of the NGO. Grievance resolution is regularly monitored by the Responsibility team.

Throughout the year, the Responsibility team and the NGO have continued to conduct awareness-raising sessions to promote the use of the confidential hotline to supply chain workers, highlighting its benefits and all services provided.

Next year, we will continue to look for opportunities to expand hotline support.

Our Ethical Trading Code of Conduct also recognises the right for employees to join trade unions and collective bargaining. Approximately 80% of the finished goods production sites we source from are covered by national and/or industrial collective bargaining agreements and many have established union representation, enabling workers to remain informed and involved in discussions about their rights.



# TRAINING AND RESOURCES

Our employees and supply chain partners are essential in helping to identify and prevent modern slavery in our supply chain. Our commitment to ensuring both internal and external training on modern slavery in the supply chain ensures we remain proactively vigilant in creating a responsible supply chain.

## Burberry internal teams' training

Our employees are introduced to our responsibility policies and programmes during their induction to ensure a general understanding of our responsibilities in this area.

Raising awareness and conducting training on the risks associated with modern slavery is critical for those making sourcing decisions. In FY 2023/24, 125 members of our internal supply chain, sourcing, internal manufacturing and product teams received either introductory or refresher training, equating to 64% of the employees invited to attend. 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. 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 further embed respect for human rights and a policy of zero tolerance for modern slavery throughout the business.

During FY 2023/24 we have been working with an external learning developer to create an online Modern Slavery training programme. This will be rolled out to a wider audience of employees at the beginning of FY 2024/25, including Human Resources teams, to further embed awareness and risk mitigation into our culture.

## Supply chain training

Our partners play an integral role in helping us to identify and prevent modern slavery in our supply chain. This is why training our supply chain partners so they have a better ability to understand, identify and manage modern slavery risks is a key component of our strategic approach to managing the risk of modern slavery in our supply chain.

As part of our onboarding process, we conduct training with all of our new finished goods suppliers to ensure they have a clear understanding of our ethical trade requirements before an audit takes place. We highlight the importance of being transparent during an ethical audit, and share how our Ethical Trading Programme works, as well as useful information about our onboarding process.

This year we continued our collaboration with the IOM, to roll out its introduction to migrant workers' protection awareness-raising programme globally. The IOM programme, covering introduction to fair and ethical recruitment, migrant workers' risks and employer responsibilities, has been contextualised for our supply chain partners, to raise awareness on country-specific risks facing migrant workers.

This was designed to help educate our finished goods suppliers, licensee partners and raw material suppliers on how to ensure the protection of migrant workers, with a specific focus on their recruitment journey. It also includes diversity and inclusion best practices in order to support the integration of migrant workers into the local workshop population.

In total, this training reached 246 supply chain partners across 15 countries and impacted approximately 57,690 workers in FY 2023/24.

Based on the positive feedback received by attendees, we are currently exploring new opportunities with IOM to deliver customised country and site-specific trainings, as well as to provide practical support if required. This will further support our supply chain partners' ability to implement enhanced due diligence and support migrant workers across their own supply chains.



# LOOKING AHEAD

We continue to strengthen the breadth and depth of our human rights due diligence and Ethical Trading Programme, as well as implement the action plans resulting from our FY 2022/23 human rights impact assessment.

A key focus in the coming year will be to continue to implement our enhanced human rights due diligence model to ensure we continually make improvements to limit risk within our supply chain and to ensure alignment to upcoming human rights legislation. This will support our commitment to addressing our most salient impacts and extending our due diligence programmes across our wider value chain.

With our strengthened human rights strategy in place, we will further focus on embedding human rights at all levels of our business operations and drive positive impact for the workers across the supply chain. This will be supported by the revisions made to our human rights impact assessment methodology and underpinned by our modern slavery mitigation programme, as well as our additional programmes such as wellbeing and health.

Over the next year we will increase our efforts to strengthen our supply chain traceability, in line with our FY 2029/30 commitments. We believe that our focus on transparency and traceability throughout the supply chain will further strengthen our ability to identify modern slavery risks and address any new challenge that might emerge.

Approved by the Board on Wednesday 8 May 2024 and signed on its behalf by:

Jonathan Akeroyd  
Chief Executive Officer

Burberry Group plc

