

Mulberry

Double Materiality, Human Rights and Environmental Impact Assessment

Between January and March 2026, Mulberry conducted a combined Double Materiality Assessment (DMA), Human Rights Impact Assessment (HRIA) and Environmental Impact Assessment (EIA) with our partner, sustainability consultancy Seismic.

The aim was to identify the most significant environmental, social and governance (ESG) topics for Mulberry and our stakeholders, and to align with the updated B Corp Standards.

Why we did this:

- To focus our sustainability strategy on the most material ESG topics across our value chain
- To ensure we understand where our activities have the greatest impact on people and nature and where we face the most significant financial risks and opportunities
- To be ready for emerging regulations and the new B Corp V2 requirements on materiality, human rights and environmental impact

METHODOLOGY

1. UNDERSTANDING MULBERRY'S CONTEXT

The assessment began by mapping Mulberry's end-to-end value chain, including farms, tanneries, hardware suppliers, textile production, UK manufacturing, third-party manufacturing, logistics, retail operations and end-of-life activities such as repair and resale. This mapping provided the foundation for identifying where the most significant environmental and social impacts may occur. Desk-based research complemented this work, including analysis of global trends, peer practices, B Corp's BIA Risk Tool and sector-specific risks relevant to leather goods, manufacturing and luxury retail.

2. IDENTIFYING POTENTIAL ESG TOPICS

In the second stage of the process, we identified specific areas of focus for each of the three assessments. Using industry frameworks and Mulberry's operating context, we initially mapped over 100 potential issues.

To ensure a granular analysis, these were categorised into three distinct workstreams:

- Double Materiality Assessment (DMA): Identification of potentially material ESG topics, covering broad governance factors like employee wellbeing, biodiversity, resource use, business ethics, transparency, and digitalisation.
- Human Rights Impact Assessment (HRIA): Identification of potential human rights impacts, specifically focusing on social issues affecting workers, supply chain labour, and local communities.
- Environmental Impact Assessment (EIA): Identification of potential environmental impacts, such as resource depletion, waste and animal farming.

Through a process of review and clustering, this list was refined to approximately 60 potentially material topics (comprising material topics and specific impacts) to be carried forward for deeper evaluation within their respective workstreams.

3. STAKEHOLDER ENGAGEMENT

Stakeholder insights were central to the methodology. Mulberry engaged representatives from six stakeholder groups - employees, suppliers, customers, investors, community partners and environmental stakeholders.

Engagement activities included:

- 9+ structured interviews with senior leaders and functional experts
- Review of supplier questionnaire responses and third-party audit data
- Discussions with community and environmental organisations such as Somerset Community Foundation and Somerset Wildlife Trust

Mulberry

- Thematic interviews and workshops to understand risk areas, expectations and emerging issues across the value chain, including representatives from Mulberry's PLC board, global supply chain and employees

This input helped validate topic relevance, shape impact scoring, and ensure that topics reflected stakeholder concerns as well as business risk.

4. SCORING IMPACTS, RISKS & OPPORTUNITIES

Following stakeholder engagement, each ESG topic was assessed using a consistent scoring framework across three assessments:

- Materiality Assessment
- Environmental Impact Assessment
- Human Rights Impact Assessment

Each topic was evaluated based on associated Impacts, Risks and Opportunities (IROs), which were scored as follows:

Impact Materiality Scoring

- Severity (scale, scope and irremediability)
- Likelihood of the impact occurring

Note: Severity was weighted more heavily in line with B Lab's prioritisation of serious negative impacts on people and nature.

Financial Materiality Scoring

- Magnitude of financial effect
- Likelihood of the financial impact

This supported analysis of how sustainability topics may affect Mulberry's performance, resilience and long-term value.

Human Rights & Environmental Impact Scoring

- Human rights topics were categorised into actual impacts and potential impacts. These were then assessed using a severity x likelihood approach aligned with international standards and adapted for the luxury goods sector.
- Environmental risks were categorised into actual impacts and potential impacts and assessed using the WWF Biodiversity Risk Filter and ENCORE models across 15 metrics covering all five drivers of nature change.

5. DETERMINING MATERIAL TOPICS

IRO scores were aggregated at the topic level. A threshold (score ≥ 12) was applied to identify which topics were impact material, financially material, or double material - meaning they are both highly significant to stakeholders and strategically important to the business.

The final list of material ESG topics covers:

- Environmental priorities such as climate change, resource use, circularity and land use
- Social priorities across the value chain including working conditions, wellbeing, skills development and community engagement
- Governance priorities including transparency, stakeholder relationship management, digitalisation, business ethics and Board oversight

These topics are visualised in Mulberry's Materiality Matrix (see appendix), which plots the relative importance of impacts on people and nature against financial materiality. All other ESG topics assessed through the DMA scored below the materiality threshold and were therefore deprioritised for strategic focus.

Mulberry

6. VALIDATION AND INTEGRATION

Findings were validated with Mulberry's Highest Governing Body and subject matter experts. Insights can now inform how Mulberry approaches its sustainability strategy review, risk management, target setting, reporting and disclosures, and B Corp's recertification requirements.

Mulberry will review and update this assessment at least every three years, or sooner if significant changes occur.

MOST MATERIAL TOPICS

The assessment refined over 100 potential ESG topics into 20 material topics across Environment, Social and Governance.

Environment

- Climate change (GHG emissions, climate adaptation)
- Circular economy (resource use, product design and lifecycle)
- Biodiversity & ecosystems (land use)

Social

- Workers in the value chain (working conditions)
- Own workforce (working conditions, training & skills, equal opportunities)
- Community engagement (artisans and local communities)

Governance

- Business conduct (transparency & communication, stakeholder relationship management, digitalisation & AI, ESG strategy integration, Board oversight)
- Business ethics (political engagement, corporate culture)
- Social inclusion of consumers (ethical marketing & selling, non-discrimination)

MATERIAL TOPICS NOT DEFINED BY B LAB

All topics identified through the Double Materiality Assessment were mapped against the B Lab standards. Two topics are not fully addressed within the current framework, demonstrating Mulberry's ability to look beyond predefined standards and identify issues that are genuinely material to the business and its stakeholders.

Digitisation and AI was identified as a financially material topic. As an emerging governance issue, it is not explicitly covered within the B Lab standards, yet it is increasingly relevant to business resilience, risk management and long-term value creation.

Circular economy was identified as an impact material topic. While elements of this are partially addressed within Environmental Stewardship and Circularity, it is a core pillar of Mulberry's sustainability strategy and a key lever for reducing environmental impact across the value chain. As such, it was considered important to retain this as a distinct material topic.

Mulberry

TARGETS

Material Topic	Target	Target Date	ExCo Responsibility
Digitalisation & AI	Establish and implement a Responsible AI Policy covering ethics, bias and environmental impact.	September 2026	Chief Operating Officer
Digitalisation & AI	Define and publish Mulberry's Responsible AI commitments and deliver responsible AI and environmental impact education to relevant stakeholders.	January 2028	Chief Operating Officer
Circular Economy	Increase circular revenue through pre-loved growth by +20% year-on-year.	April 2027	Chief Customer and Digital Officer

WHAT WE LEARNED

The assessment highlighted that:

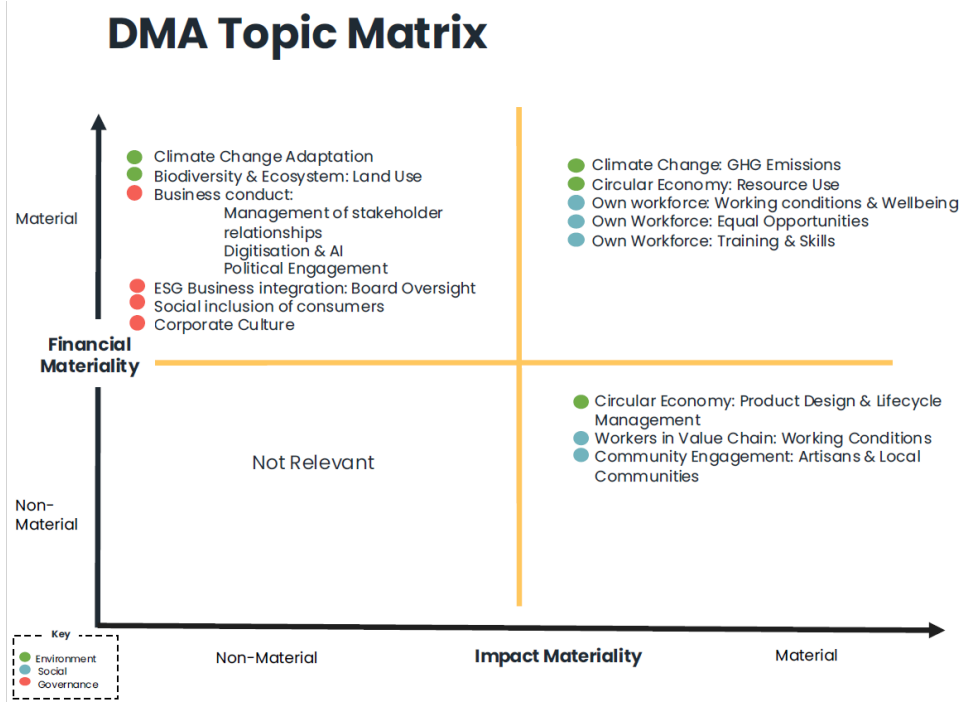
- Climate and resource use are dual priorities – both financially and in terms of impact on nature.
- Social risks are concentrated in our operations and supply chain, including working conditions, wellbeing and culture.
- Governance issues (e.g. data, digitalisation, greenwashing risk, political engagement) are key financial risk drivers.
- Circular economy, digitalisation and responsible sourcing are cross-cutting themes for long-term value.

We will use these insights to guide our strategy, targets and reporting in the coming years.

Mulberry

Appendix

DOUBLE MATERIALITY ASSESSMENT TOPIC MATRIX



HUMAN RIGHTS ASSESSMENT & ENVIRONMENTAL IMPACT ASSESSMENT MATERIALITY MATRIX

