

# Mulberry

## Human Rights & Responsible Sourcing Policy

### OUR PURPOSE

Born in Somerset in 1971, Mulberry is an iconic lifestyle brand with a playful and uniquely British blend of creativity, community, craft and culture. Since Roger Saul, our founder, first turned leather offcuts into belts at his kitchen table, Mulberry has become a globally recognised brand, and the largest manufacturer of leather goods in the UK. Our commitment to modern British craftsmanship has always underpinned both our creative and commercial strategies, and today our two Somerset factories are the manifestation of our purpose. We are a significant local employer firmly rooted in the community. We are building a climate-resilient supply chain, responsibly sourcing materials with a specific focus on lowering the impact of leather. We are exemplifying how circularity can be baked into business culture, with a dedicated repair and restoration team, a thriving resale proposition, The Mulberry Exchange. We are a bastion of craft and innovation with a well-established apprenticeship programme that ensures skills are honed and handed on. These we believe are the fundamentals of a business that is Made to Last.

### SCOPE

Mulberry recognises that our responsibility to respect human rights extends beyond the workplace to the broader social, cultural, and environmental impacts our operations may have on communities. This policy applies to all individuals and communities who may be affected by Mulberry's own operations and by activities across our entire value chain. This includes workers, contractors, supply chain workers at all tiers, local communities, indigenous peoples, and any other stakeholders who may be impacted by our business activities.

### STAKEHOLDER COMMITMENT

Mulberry is committed to creating long-term value for all stakeholders, including workers, supply chain partners, customers, communities and the environment. We consider the impacts of our decisions on these stakeholders, in line with our Stakeholder Governance Policy and our broader commitment to responsible and sustainable business practices. This policy forms part of our approach to ensuring the rights and wellbeing of all stakeholders are respected throughout our operations and value chain.

### ETHICAL BUSINESS PRACTICE

At Mulberry, we are committed to conducting our business with the highest standards of integrity, fairness, and accountability. We believe that ethical behaviour is fundamental to long-term success and to building trust with our employees, customers, partners, and communities. We engage with workers and their representatives, where applicable, to understand human rights risks and support effective implementation of this policy. We respect all internationally recognised human rights as set out in the International Bill of Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Our approach to human rights due diligence is guided by the UN Guiding Principles on Business and Human Rights.

All employees and representatives of Mulberry are expected to uphold principles of honesty, transparency, respect, and responsibility in all business dealings. We comply with all applicable laws and regulations and actively work to prevent corruption, discrimination, exploitation, and any other unethical conduct. We foster a culture where ethical concerns can be raised without fear of retaliation,

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and we continuously strive to improve our practices through education, dialogue, and responsible leadership. We expect our suppliers and business partners to adhere to this policy and our standard of business ethics.

Mulberry is committed to upholding the principles of fair competition in all our business activities. We operate with integrity, comply with all applicable antitrust and competition laws, and reject any form of anti-competitive behaviour, including collusion, price-fixing, market allocation, bid-rigging or abuse of market dominance. We believe that open and honest competition drives innovation, quality, and value for customers. All employees, suppliers and business partners are expected to act in a manner that supports competitive fairness, respects the rights of competitors and fosters a healthy and transparent marketplace. We are committed to continuous improvement in our human rights due diligence processes, including reviewing and strengthening our practices as new risks, stakeholder expectations and regulations evolve.

## OUR RELATIONSHIPS WITH SUPPLIERS

Mulberry builds long-term, responsible partnerships with suppliers who share our commitment to respecting human rights, ethical business conduct and sustainable practices. The Human Rights & Responsible Sourcing Policy sets the minimum standards all suppliers must meet, including the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, covering:

- abolition of child labour,
- elimination of forced or compulsory labour,
- freedom of association and collective bargaining,
- elimination of discrimination, and
- safe and healthy working conditions.

Suppliers must respect all internationally recognised human rights, including those set out in the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights and Economic, Social and Cultural Rights, and comply with Mulberry's environmental and animal welfare expectations.

Mulberry will identify and assess actual and potential human rights impacts in its own operations and supply chain, and we work collaboratively with suppliers to prevent, mitigate and address these risks. When prioritising human rights risks, Mulberry considers the severity, scale, likelihood and irremediability of potential impacts, in line with the UN Guiding Principles on Business and Human Rights.

We recognise that responsible purchasing practices are essential to supporting human rights. Mulberry is committed to engaging with suppliers in a fair, transparent and predictable manner, avoiding practices that may contribute to excessive working hours, unsafe conditions, or other human rights risks. We support suppliers through open dialogue, regular site visits, ongoing due diligence and capacity-building where needed.

All product and major suppliers must sign the Human Rights & Responsible Sourcing Policy and comply with our Anti-Bribery and Corruption Policy as part of onboarding. We monitor compliance through

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meetings, audits, site visits and annual due diligence questionnaires, and subcontracting is prohibited without prior approval and assessment. Persistent non-compliance may lead to ending the business relationship.

## GRIEVANCE MECHANISMS AND REMEDIATION

Mulberry is committed to providing and supporting effective grievance mechanisms for individuals and communities who may be adversely impacted by our operations or value chain.

If we identify that we have caused or contributed to negative human rights impacts, we will provide for or cooperate in legitimate remediation, in line with the UN Guiding Principles on Business and Human Rights. We will:

- Maintain accessible and confidential channels for workers, suppliers, and external stakeholders to raise concerns or report potential human rights violations without fear of retaliation;
- Work with affected stakeholders and, where appropriate, expert organisations to understand impacts and design appropriate remediation; and
- Monitor the effectiveness of remediation actions and seek continuous improvement in our grievance and remedy processes.

Suppliers are expected to establish their own grievance mechanisms that are legitimate, accessible, equitable, transparent, rights-compatible and based on engagement and dialogue.

MULBERRY GROUP PLC  
MARCH 2026

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### CODE OF CONDUCT

#### 1. NO CHILD LABOUR

There shall be no recruitment of child labour. Children under the age of 15 shall not be recruited or employed (or higher age if required by the law). Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions. The policies and procedures shall conform to the relevant International Labour Organisation (ILO) policies.

#### 2. EMPLOYMENT IS FREELY CHOSEN

There shall be no forced, bonded, or involuntary prison labour. Worker-paid recruitment fees are prohibited; workers must not be required to lodge deposits or their identity papers on commencement of employment. Workers must be free to leave their employer after reasonable notice.

#### 3. FREEDOM OF ASSOCIATION AND EMPLOYEE REPRESENTATION

Suppliers should respect the rights of employees to join or form an association of their choosing (such as workers council, union, or workers association). Where the right to freedom of association and collective bargaining is restricted by law, the employer should facilitate, and not hinder, the development of parallel means for independent and free association and bargaining. Representatives must not be discriminated against and have access to carry out their representative function in the workplace.

#### 4. NO DISCRIMINATION

There must be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, union or political membership.

Mulberry respects the rights and dignity of Indigenous peoples and supports the principles of the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). While this is a low-risk area for Mulberry's business, Mulberry remains committed to ethical practices and expects all suppliers to do the same.

#### 5. WAGES AND BENEFITS OF EMPLOYMENT

Wages and benefits paid for a standard working week must meet, as a minimum, national legal requirements, or industry benchmark standards, whichever is higher. Wages should cover the need to meet both basic needs and some discretionary income. All workers - regardless of gender or any other protected characteristic - must be paid fairly and equitably. All workers should be provided with written and understandable information about their employment conditions and wages before employment and provided with wage slips for each period they are paid. Deductions from wages as a disciplinary measure is not permitted other than those required by law. Any such deductions must not be taken without the expressed permission of the worker concerned.

Mulberry is an accredited Living Wage Employer and part of a network of businesses across the UK who voluntarily choose to pay all employees a Real Living Wage. On a global scale, Mulberry recognises the work of the Global Living Wage Coalition who are developing a living wage benchmark for many countries. Mulberry extends its commitment to fair pay throughout our supply chain and encourage suppliers to pay the equivalent living wage for their country.

#### 6. HOURS OF WORK AND REGULAR EMPLOYMENT

Working hours should comply with local and national laws, whichever offers greatest protection. In any event workers should not, on a regular basis, be required to work more than 48 hours per week. They should be given one day off in every 7-day period on average. Overtime should be voluntary, not requested on a regular basis and not exceed the legal limit for the country. Overtime should be paid at a premium rate. To every extent possible, work performed should be on the basis of a recognised employment relationship. Obligations to employees under labour or social security laws and regulations should not be avoided through the use of home working schemes, subcontracting or apprenticeships where there is no intent to provide regular employment. The conditions for the termination of a contract should be laid out before employment commences and conform to

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established and transparent company practices and local law.

## 7. DISCIPLINE

There must be a zero-tolerance approach to employee harassment, abuse, or violence in any form - physical, sexual, or verbal. All workers must be treated with dignity and respect.

Mulberry has a “whistle blowing policy” for its employees and encourages all suppliers to have a similar provision.

## 8. HEALTH AND SAFETY

Suppliers are expected to follow the conventions of the International Labour Organisations Occupational Safety and Health Convention, 1981 (No. 155) and the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187). A safe, clean and hygienic environment should be provided, considering the specific hazards of the industry. Adequate steps should be taken to prevent accidents and injury to health at work. Workers should receive regular and recorded health and safety training. All workers should have access to clean toilet facilities and drinking water. Where provided, accommodation should be clean, safe and meet the basic needs of workers. Without any cost to the worker, adequate personal protective clothing and equipment which are reasonably necessary when hazards cannot be otherwise prevented or controlled. Work organisation, particularly with respect to hours of work and rest breaks, must not adversely affect

occupational safety and health. A senior manager should be appointed as the Health and Safety representative for the company.

Suppliers must inform Mulberry in writing with details of any serious or fatal incidents within their facilities within one month of occurrence.

## 9. ENVIRONMENT

Mulberry has set ambitious science-based greenhouse gas emission reduction targets, which heavily rely on the engagement of our supply chain to reduce Scope 3 emissions. On request, suppliers are required to provide Mulberry with emissions data related to the carbon intensity of their own manufacturing facilities, logistics and supply chain. Mulberry expects suppliers to measure and reduce their own impact on the environment, including by measuring their own carbon footprint, water usage, minimising waste and adopting circular principles throughout their operations.

## 10. ANIMAL WELFARE

Suppliers should ensure the highest standards of animal welfare are adopted in the production of hides through the life of the animal and during the slaughter process. Animals should live free of hunger, thirst, distress, pain or disease. To this end all suppliers should sign and implement Mulberry’s Animal Welfare Policy. No material should be used from any recognised endangered or prohibited animal.

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## RELATED POLICIES:

- Anti-Bribery and Corruption Policy
- Animal Welfare Policy
- Modern Slavery Act Statement
- Stakeholder Governance Policy
- Stakeholder Grievance Procedure

<b><i>Approved by</i></b>	<i>Chief Executive Officer and Chief Financial Officer</i>
<b><i>Policy owner(s)</i></b>	<i>Head of Group Sustainability</i>
<b><i>Supporting owner(s)</i></b>	<i>Head of Planning &amp; Responsible Sourcing</i>
<b><i>Effective date</i></b>	<i>March 2026</i>
<b><i>Review frequency</i></b>	<i>Annual (pending standards or regulations change)</i>
<b><i>Applies to</i></b>	<i>All workers, contractors, supply chain workers at all tiers, local communities, indigenous peoples, and any other stakeholders who may be impacted by our business activities.</i>