

Mulberry

Mulberry Group Plc's disclosure requirements under the UK Modern Slavery Act 2015 and California Transparency in Supply Chains Act 2010 for the financial year April 2025 to March 2026

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.

THIS STATEMENT

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “**UK Act**”) and the California Transparency in Supply Chains Act 2010 (SB 657) (the “**California Act**”) for the financial year April 2025 to March 2026 (“**FY26**”).

This is Mulberry's eleventh statement under the UK Act and California Act, updated to reflect the steps taken to monitor and prevent modern slavery from occurring in its own operations and supply chain during FY26, and identifying the areas on which it will focus in the coming year.

ORGANISATION AND SUPPLY CHAIN STRUCTURE

About Mulberry

Mulberry Group plc (“**Mulberry**” or the “**Company**”) is a UK-based public limited company, listed on the Alternative Investment Market (AIM) of the London Stock Exchange and headquartered in Somerset, England. Mulberry designs, develops, manufactures, sources, and sells a range of women's and men's leather bags and accessories; luggage; soft accessories and jewellery; women's ready-to-wear; women's footwear; eyewear; and lifestyle products. It employs approximately 930 people globally and operates through a network of subsidiary entities supporting its operations.

Mulberry's supply chain is closely controlled through the use of own manufacturing facilities and warehouse and distribution facilities in the UK. Approximately 50% of Mulberry's iconic bags (such as the Bayswater, Alexa and Lily) are manufactured at its two-owned Somerset factories, complemented by carefully selected suppliers in Italy, Türkiye, China and Vietnam, as well as a small number of other manufacturing countries for specific products. These suppliers support the sourcing of raw materials (such as leather), component manufacturing and finished goods production. Eyewear is manufactured and supplied under licence by De Rigo Vision, Italy.

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Mulberry's products are sold globally through its own store network, its concessions and wholesale partnerships and online at www.mulberry.com and through selected online concessions, with a retail presence in over 15 countries and online distribution to more than 190 markets worldwide.

This structure enables Mulberry to balance heritage craftsmanship, responsible sourcing and scalable international distribution.

Supply Chain Transparency

Mulberry's supply chain comprises a diverse network of direct (Tier 1) and indirect (Tier 2 and beyond) suppliers across the luxury fashion value chain.

- Direct suppliers (Tier 1) are primarily finished goods manufacturers and assemblers, located across the UK, Europe and Asia, operating mainly within the leather goods, apparel and accessories manufacturing sectors; and
- Indirect suppliers (Tier 2, Tier 3 and Tier 4) include businesses involved in componentry material and fabric production, and tanneries with a significant concentration in Europe (particularly Italy), as well as Asia and other global regions. Aligned to Textile Exchange's Supply Chain Taxonomy Framework, the Company defines Tier 3 as material processing and Tier 4 as raw material production (such as farms) and primary processing (such as abattoirs).

Mulberry has strong visibility of its supply chain, with a published supplier list covering 100% of Tier 1 and Tier 2 suppliers and a supplier questionnaire return rate of 93% in FY26, increasing from 89% in FY25 and 77% in FY24. The supplier list is updated annually and is available at www.mulberry.com. In 2025, Mulberry partnered with 27 Tier 1 suppliers, in 9 countries and 51 Tier 2 suppliers in 10 countries.

As part of its commitment to traceability and transparency, Mulberry is working to increase visibility beyond Tier 1 and 2 to the earlier stages of its supply chain. Mulberry is in the initial stages of mapping its full leather supply chain in collaboration with its tannery partners and the Sustainable Leather Foundation ("SLF"). Certain Tier 3 and Tier 4 suppliers are already captured on Mulberry's supplier list.

Mulberry has supply chain offices in the UK, Türkiye and China, the locations in which it orders the highest volumes. Individuals at these offices are employed by Mulberry and work directly with its suppliers, ensuring that training and quality standards are upheld, alongside providing the Company with data and metrics as and when required.

POLICIES

Following the Human Rights Impact Assessment undertaken in early 2026 (see further below), Mulberry introduced its Human Rights and Responsible Sourcing ("HRRS") Policy ([link](#)), which consolidates and replaces the earlier Global Sourcing Principles. The HRRS Policy is supported by other employee policies such as the Anti-Bribery and Corruption Policy and the Stakeholder Grievance Procedure ([link](#)), which set clear expectations for ethical conduct across Mulberry's operations and supply chain.

These policies incorporate principles consistent with the UN Guiding Principles on Business and Human Rights and reflect the International Labour Organization (ILO) Core Conventions including

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commitments to prohibit forced labour, child labour and all forms of coercion, harassment or intimidation, and to ensure that employment is freely chosen, with no retention of identity documents or restriction of movement. They also uphold workers' rights to fair wages, reasonable working hours, freedom of association and collective bargaining.

Mulberry's policies are communicated across the business to employees, suppliers, licensees and contractors (among others) and understanding and enforcement of standards is achieved through contractual commitments, training, supplier questionnaires, audits and ongoing engagement.

Mulberry engaged with a range of internal and external stakeholders to develop and implement these policies, including:

- internal teams, such as Sourcing, Quality, Sustainability and Buying teams, who support policy development and embed requirements into supplier selection and management processes;
- suppliers and subcontractors, who are required to implement Mulberry's HRRS Policy and provide input through questionnaires, audits and ongoing engagement;
- third-party audit providers, who support implementation through site assessments and monitoring of working conditions; and
- industry bodies and initiatives, including the Leather Working Group ("LWG") and the SLF, which inform policy development and alignment to industry standards.

ASSESSING AND MANAGING RISK

Governance

Responsibility for identifying, assessing and responding to modern slavery risks sits with Mulberry's Responsible Sourcing, Quality and Sustainability teams, who manage supplier due diligence and monitoring and engagement across the supply chain.

All employees and business partners are required to support the prevention, detection and reporting of modern slavery risks in line with the policies described above.

Senior oversight is provided by the Board of Directors, which holds ultimate accountability for ethical business practices and risk management. In 2024, Mulberry restructured its governance and the Sustainability team has since reported directly to the CEO, Andrea Baldo and sustainability continues as a standing item on the Board agenda. This statement is reviewed and approved by the Board annually and signed by the Chair.

Risk Identification

In early 2026, Seismic carried out a Human Rights Impact Assessment ("HRIA") on Mulberry's behalf. The HRIA identified that Mulberry's highest-priority modern slavery risks are concentrated in the upstream supply chain and manufacturing stages rather than in its own operations, and include:

- raw material sourcing and early-stage processing (for example farming, slaughterhouses and tanneries), where risks include forced labour, migrant-worker exploitation and hazardous working conditions;
- leather and metal/hardware processing, where workers may face chemical exposure, unsafe environments and potential child or forced labour;

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- finished goods manufacturing, particularly in non-UK production, where risks include excessive working hours, wage issues and vulnerable migrant labour; and
- cross-cutting risks of unauthorised subcontracting and limited visibility in deeper tiers, increasing the likelihood of labour exploitation.

Mulberry prioritises these risks based on severity and likelihood, with the most significant risks located within the supply chain rather than its own operations.

Mulberry identifies and assesses modern slavery risks on an ongoing basis through a Human Rights Due Diligence (“**HRDD**”) process combining:

- annual supplier questionnaires capturing detailed information on recruitment practices, working hours, wages and grievance mechanisms;
- independent third-party social audits conducted by The Reassurance Network and Fair Working Conditions, comprising site inspections, documentation review and worker interviews against the Ethical Trade Initiative Basecode and Mulberry's HRRS Policy.
- Audits are announced or semi-announced (the supplier is informed of a two-week window);
- desk-based research, including country risk indices, NGO and media monitoring, and certification data (including from the LWG, SLF and Better Cotton);
- worker interviews conducted during audits and engagement through grievance and whistleblowing mechanisms. To bolster this, in 2026, Mulberry published its Stakeholder Grievance Procedure ([link](#)) accessible to workers, suppliers, employees and external stakeholders across the value chain, allowing concerns to be raised confidentially and without fear of retaliation, with each concern reviewed, investigated and, where needed, subject to corrective action monitored through to resolution; and
- Mulberry employees being present at key suppliers' factories, trained to report any suspicious or unusual activity.

Mulberry operates three employee committees, led by the Chief Operating Officer, covering its Somerset, London and Retail sites, with representatives from across the business. The committees provide an opportunity to log feedback and complaints. In the wider supply chain, 81% of its Tier 1 and Tier 2 suppliers elected to have unions or collective bargaining agreements in place in FY26, and those that did not were typically smaller family run businesses.

This approach goes beyond contractual compliance by combining supplier partnership and worker input (amongst other things) to strengthen labour standards across the supply chain.

Remediation

Where non-compliances are identified, they are recorded on an auditing dashboard, enabling Mulberry to track supplier behaviour in line with its HRRS Policy. The Company engages in advocacy or other collective action to address systemic issues and enable the prevention or mitigation of issues. Tracking is often conducted by in-country teams, ensuring corrective actions are not only followed up but completed in due course, outlining Mulberry’s ethos of continuous improvement. Progress is monitored through follow-up engagement and assessment. Where issues remain unaddressed or there is a lack of engagement, this may lead to escalation, including suspension of orders or, ultimately, choosing to responsibly exit its relationship with the supplier as a last resort.

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For employees, breaches of policy are managed through formal disciplinary procedures, which could result in warnings or termination of employment.

Training

The Sustainability team has created a series of training modules available to all global employees via Mulberry's intranet, covering topics including B Corp certification and supplier transparency. All employees are provided with copies of the policies described earlier in this statement upon joining the Company.

A new HRRS training model has been under development during 2026, covering matters such as how to recognise modern slavery, Mulberry's approach to HRDD and how to raise concerns. Whilst this is targeted at employees and management who have a direct responsibility for supply chain management, the intention is for this to be rolled out across the full Mulberry business and value chain.

Monitoring Effectiveness & Continuous Improvement

There have been no confirmed incidents of forced labour, child labour or human trafficking identified across Mulberry's operations and supply chain in FY26. Since the previous statement, Mulberry has undergone an independent HRIA, implemented the new HRRS Policy and Stakeholder Grievance Procedure, achieved a supplier questionnaire return rate of 93%, commenced mapping at Tier 3 and Tier 4 levels and began development of a dedicated HRRS training module.

In the coming year, Mulberry's key goal is to embed the findings of the HRIA, its new policies and its improved HRDD processes into day-to-day sourcing and purchasing decisions. Other goals include rolling-out the HRRS training module, continuing to maintain a high supplier questionnaire return rate and increasing the number of Tier 3 and Tier 4 suppliers recorded on its supplier list. The promotion of an ethical supply chain will continue to be a priority for the Company.

For further details on Mulberry's approach to sustainability and corporate social responsibility please refer to the Impact Report ([link](#)), which is updated annually.

Approved by the Board of Directors of Mulberry Group Plc on 21 July 2026 as applicable to Mulberry Group Plc and its subsidiaries, including its UK trading subsidiaries, Mulberry Company (Design) Ltd and Mulberry Company (Sales) Ltd.

CHRIS ROBERTS
CHAIRMAN, MULBERRY GROUP PLC