

Burberry Group plc

TICKER
LON:BRBY

MARKET CAPITALIZATION
US\$10 billion

HEADQUARTERS
United Kingdom

DISCLOSURES

UK Modern Slavery Act: Yes

California Transparency in Supply Chains Act: Yes

TARGETS

Yes

OVERALL RANKING

11 out of 37

([2018 Rank](#): 13 out of 43)

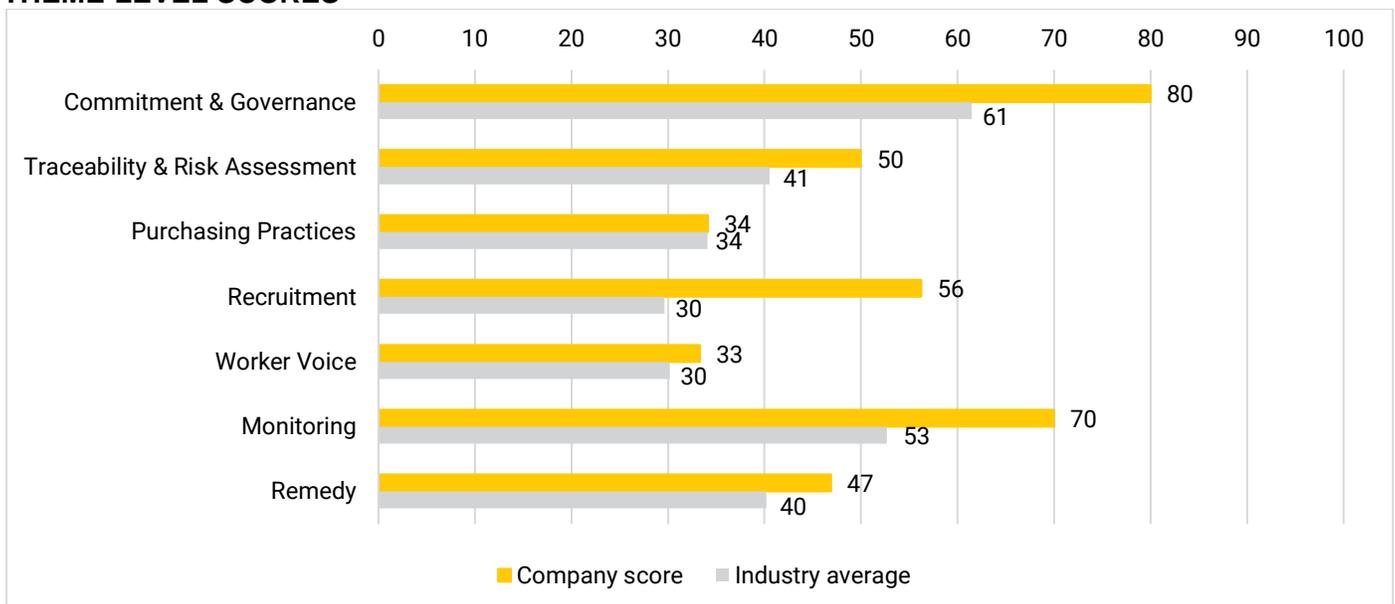
OVERALL SCORE

53 out of 100

SUMMARY

Burberry Group plc (Burberry), one of the largest luxury brands in the UK,¹ ranks 11th out of 37 companies, disclosing more information on its forced labor policies and practices than its peers on all themes except Purchasing Practices. Compared to 2018, Burberry improved its rank by two places. This is because it began disclosing information on its tracing of raw materials, the percentage of its first-tier and raw material suppliers covered by collective bargaining agreements, strengthened migrant worker policies, a wellbeing tool that engages workers, and an example of the repayment of recruitment-related fees to workers. The company is the highest-scoring luxury apparel company in the benchmark. Burberry states that it does not work with suppliers in Xinjiang or source materials from the region, but it does not disclose the steps it has taken to address the risks of alleged Uyghur forced labor across its supply chain tiers. Burberry has an opportunity to improve on the themes of Traceability & Risk Assessment, Worker Voice, and Remedy.

THEME-LEVEL SCORES



KEY DATA POINTS**SUPPLIER LIST**

■ No

IMPROVEMENTS OF FREEDOM OF ASSOCIATION

■ No

HIGH-RISK RAW MATERIALS²

■ Cashmere, cotton, silk, and others

DATA ON PURCHASING PRACTICES

Yes (One data point only)

REMEDY FOR SUPPLY CHAIN WORKERS

Yes (Limited)

LEADING PRACTICES

Monitoring: Burberry discloses that its monitoring program has been expanded and covers 70% of its raw material suppliers. It states that the monitoring includes assessments of mills, tanneries, fabric and trim suppliers, and their subcontractors.

NOTABLE FINDINGS

Training: Burberry states that it conducts internal training for decision-makers and employees who engage with its supply chains on recognizing and addressing forced labor risks. It further states that it trains first-tier suppliers, subcontractors, and raw material suppliers on identifying and preventing forced labor.

Risk Assessment: Burberry discloses that it conducts a human rights impact assessment that addresses forced labor on its operations and supply chains every two years. It states that this process includes worker interviews and engaging stakeholder groups and local NGOs and that geographical, economic, and social factors are taken into consideration. It identifies migrant workers and women as at risk of forced labor at different levels of its supply chains, and it identifies Italy as a location with increased risks in relation to migrant workers.

Recruitment: Burberry prohibits worker-paid recruitment fees and requires its suppliers to keep a record of fees paid on behalf of the worker. It discloses an example of the repayment of recruitment-related fees to workers at 11 supplier facilities where workers had been charged for pre-employment health checks. It also discloses working with two suppliers and the Issara Institute to prevent recruitment fees from being charged in the future by “developing an ethical recruitment route.” It states that it is mapping recruitment journeys in “identified hotspots.” It further prohibits the retention of workers’ identity documents and requires suppliers to ensure that migrant workers understand their contract terms before departure from their home country.

OPPORTUNITIES FOR IMPROVEMENT

Traceability & Risk Assessment: Burberry is encouraged to demonstrate a strong understanding of its supply chains by disclosing the names and addresses of at least its first-tier suppliers, information on its below-first-tier suppliers, and a full list of countries from which it sources raw materials at high risk of forced labor. While it discloses aggregate data points on its suppliers’ workforce, it is encouraged to disclose a second data point per supplier.

Worker Voice: Burberry may consider disclosing evidence of the positive impact of worker engagement in its supply chains and providing examples of worker engagement initiatives covering different supply chain contexts. It is also encouraged to work with local or global trade unions to support freedom of association in its supply chains. Further, it is encouraged to disclose examples covering different supply chain

contexts of how it improved freedom of association and/or collective bargaining for its suppliers' workers, such as migrant workers.

Remedy: Burberry may consider establishing a process to ensure that remedy is provided to workers in its supply chains in cases of forced labor and disclosing details on this process, such as responsible parties, approval procedures, timeframes, and, crucially, engagement with affected stakeholders. While it discloses one example of its remedy process in practice, it is encouraged to disclose further examples of remedy provided to its suppliers' workers.

ENGAGED WITH KNOWTHECHAIN³

Yes ([Provided Additional Disclosure](#)).

¹ Statista (25 November 2020), "[Leading luxury brand revenues originating from the United Kingdom \(UK\) in 2019.](#)"

² For further details on high-risk raw materials and sourcing countries, see [KnowTheChain's 2021 Apparel and Footwear Benchmark Report](#).

³ Research conducted through November 2020 or through February 2021, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the [Business & Human Rights Resource Centre website](#).