

## PROCEDURE FOR COLLECTING AND PROCESSING ALERTS

### 1. Introduction

The Ralph Lauren Group (“**Ralph Lauren**”) has a long-standing commitment to conduct business in compliance with all applicable laws and regulations and with the highest ethical standards, including as set forth in our *Code of Business Conduct and Ethics*.

Upholding this commitment is important to Ralph Lauren’s continued success of. It is the responsibility of every employee and other person working with Ralph Lauren to comply with these obligations, as is the responsibility to report any potential violations of these obligations of which they may become aware. If Employees do not report any breach that he/she is aware of, this could result in disciplinary actions.

To facilitate this reporting, Ralph Lauren has set up an internal reporting channel, called the “**Hotline**”, whose operation is described in this policy.

### 2. Purpose of the Policy

The purpose of this policy is to define the procedure for collecting and processing internal reports made via the Hotline by employees and other covered persons, as defined in section 3.1 below.

### 3. Scope

#### 3.1 *To Whom the Policy Applies*

This Policy applies to all current and former Ralph Lauren employees, applicants, volunteers and interns, employees with training contracts, employees working under the supervision of contractors, suppliers and subcontractors, persons who are self-employed, shareholders and member of the governing bodies (including non-executive members) and any other third party having a work-related connection to Ralph Lauren.

This policy applies both to persons using the Hotline to make a report (the “**Reporters**”) and to persons who are accused or witnesses to that report.

#### 3.2 *Subject Matter to which the Policy Applies*

The Hotline is the designated channel for reporting:

- Offences related to: (i) public procurement; (ii) financial services, products and markets, and/or prevention of money laundering and terrorist financing; (iii) product safety and/or compliance; (iv) transportation safety; (v) environmental protection; (vi) radiation protection and/or nuclear safety; (vii) food and/or food safety, animal health and/or animal welfare; (viii) public health; (ix) consumer protection; (x) protection of privacy and/or personal data, and/or the security of networks and/or network and/or information systems;
- Offences affecting the financial interests of the European Union, such as breaches of the relevant anti-fraud or anti-corruption legislation;

- Offences relating to the internal market, in particular breaches of the rules on competition and/or State aid; and
- Acts or omissions that may constitute a criminal offence or a “serious” or “very serious” administrative infringement, including all those criminal offences or serious or very serious administrative infringements that involve economic loss for the Public Treasury and/or for Social Security.

Examples of the above would be :

- Anti-competitive practices;
- Discrimination or harassment in the workplace;
- Misconduct such as offensive or inappropriate communication or behaviour, conflict of interest, retaliation, unfair labour practices, time abuse, fraud, theft or misuse of company products, tools or materials;
- Danger to health and safety or damage to the environment;
- Breach of safety and consumer protection obligations;
- Violation of financial, accounting, auditing, anti-corruption, and banking rules;
- Breach of data protection, IT security and privacy rules;

To assist Reporters, Ralph Lauren provides definitions of examples of reportable violations and breaches. These definitions will allow each Reporter to assess whether the conduct or actions they wish to report fall within the scope of this policy. These definitions are attached as Annex A. They are also available directly on the Hotline website.

The Hotline should not be used to report matters outside the scope of this policy.

If a Reporter is unsure whether the matter he or she wishes to report falls within the scope of this policy, he or she is nevertheless encouraged to report it. Ralph Lauren prefers that a Reporter report something outside the scope of this policy rather than let possible unethical behavior go unchecked.

The Reporter will be informed by the Local Reporting System Manager that the reported behaviour does not fall within the scope of this policy. The Reporter will then be invited to report the problem using the other reporting channels available. The Local Reporting System Manager may also, at his/her sole discretion, decide to pass on to the appropriate services reports that do not fall within the scope of this policy.

In any case, the Hotline cannot be used to report facts and/or submit documents covered by legal privilege.

If a Report is not received through the reporting channels mentioned in this Policy but through other channels or employees, the employee receiving such Report must immediately communicate the same to the Local Reporting System Manager in a maximum period of 48 hours, immediately deleting the Report received. The person who has received the Report must keep strict confidentiality on the Report. Failure to comply with this reporting and confidentiality obligations may lead to disciplinary actions.

#### **4. Collection of alerts**

The Hotline is the designated channel for those persons who wish to make a report.

Reporters can use the Hotline via one of the following methods:

1. Calling the toll-free Hotline number at **00-800-CALL-POLO**. The Hotline is available 24 hours a day, 365 days a year.
2. Logging onto <https://secure.ethicspoint.com/domain/media/en/gui/57948/index.html> from any computer with an Internet connection and clicking on the link to file a web report.

If the Reporter wishes to report orally, this can be done by phone on the numbers indicated above and, at his/her request, during a video conference or a physical meeting with the Local Reporting System Manager organized within 7 days of the request.

Reporters using the toll-free telephone number will reach a call center operated by NAVEX Global, Inc. (“NAVEX Global”) – a U.S based third-party service provider, which will notify the Local Reporting Manager of the report. Reporters will have the option of placing call in English or in the language of the country from which they are calling.

After reporting a concern to the Hotline, the Reporter will be assigned a report ID and must enter a password. This will allow the Reporter to check periodically on the progress of his/her report.

Reporters must identify themselves when reporting their concerns, by providing their names and contact details.

When reporting, Reporters will be informed that:

- Their reports will be handled confidentially as far as possible,
- Their identity will not be disclosed to the person(s) named in the alert; and
- No retaliatory action will be taken against them when the report has been submitted in good faith.

If the Reporter does not wish to reveal his/her identity, he/she will have the possibility to submit his/her report anonymously. He/she will nevertheless be informed that reporting facts or behaviour anonymously may make the investigation or communication of the results more difficult. If they still wish to remain anonymous, the report will be recorded as such and treated in accordance with paragraph 7 of this policy.

If the Reporter identifies himself or herself, his/her identity will be kept confidential to the fullest extent practicable, provided this does not prevent Ralph Lauren from conducting a thorough investigation. Ralph Lauren may disclose information revealing the identity of the Reporter with the Reporter’s consent or where required by law, such as pursuant to a court order, with prior notice to the Reporter. Any decision to disclose the identity of the Reporter will be made in coordination with DPO and/or Legal department.

## **5. Initial Review and Processing of Concerns or Allegations**

### ***5.1 Processing of Personal Data***

In the course of the reporting procedure, Ralph Lauren Espana S.L.U will collect and process the personal data of the Reporter, the persons whose names have been signed in this context, the persons who are accused or witnesses to that report. Such personal data will be processed in order to comply with the laws and regulations applicable to Ralph Lauren Espana S.L.U, notably the Law 2/2023, of February 20, 2023, regulating the protection of persons who report regulatory violations and the fight against corruption.

In this regard, the purposes of processing are to manage the whistleblowing system and processing the reports, and to conduct business in compliance with all applicable laws and regulations with the highest ethical standards, including as set forth in Ralph Lauren's *Code of Business Conduct and Ethics*.

The following data may be collected or processed during alerts:

- The identity, position and contact details of the Reporter;
- The identity, position and contact details of the person whose conduct is being questioned or the witnesses named;
- The identity, position and contact details of the persons in charge of processing alerts;
- The facts reported and evidence collected during the investigation;
- The evidence gathered in the course of the investigation;
- The outcome of the report.

In this context, Ralph Lauren will endeavour not to collect and process sensitive personal data, *i.e.*, data which includes any information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life or orientation, criminal record. If such data is nevertheless related to the purpose or nature of the alert, Ralph Lauren will endeavour to minimise any collection and further processing of such data.

In this regard, the following data must not be collected and, if so, must be immediately deleted:

- Personal data that are not manifestly relevant to the processing of a specific report.
- Personal data that may have been communicated and which relate to a conduct that does not fall within the scope of this policy.
- Any report that is proven to be untrue, unless the lack of truthfulness may constitute a criminal offense. In case a criminal offense is identified, the information should be stored until the corresponding judicial proceeding terminates.

The personal data processed in the context of the Hotline will be limited to the data strictly and objectively necessary to verify the allegations reported.

In any case, only the following persons and bodies will be entitled to access the personal data processed in the context of the Hotline:

- The Local Reporting System Manager, or any other person that manages the Hotline directly,
- The Head of People Business Partnership, EMEA,
- The Local Human Resources Head, where disciplinary measures should be taken against an employee and in any other scenario on need-to-know basis,
- The Legal Head, where legal measures should be taken and in any other scenario on need-to-know basis,
- Data processors appointed by Ralph Lauren,
- The DPO,
- The Global People and Practice (GPP) Head, on a need-to-know basis,
- The Internal Audit Department, on a need-to-know basis,
- Asset Protection and People & Development Departments, on a need-to-know basis.
- The Finance Department, on a need-to-know basis.
- The IT Department, on a need-to-know basis.
- External advisors.

Lastly, the Local Reporting System Manager may also involve, where necessary, other internal professionals for the purpose of conducting an internal investigation, including Human Resources members and internal legal counsels, who are also subject to a strict duty of confidentiality.

The Data Subjects' Rights outlined in Section 11 or any inquiries regarding the processing of personal data may be addressed to the DPO by sending an e-mail to the following address: [dpo@ralphlauren.com](mailto:dpo@ralphlauren.com).

In addition to the Data Subjects' Rights outlined in Section 11, any person whose personal data are processed by Ralph Lauren and who is therefore a data subject has the right to lodge a complaint before the competent Data Protection Supervisory Authority.

## ***5.2 Processing of alerts***

When a report is submitted via the Hotline, an initial report will be prepared by NAVEX Global. After the information has been entered into the system, a notification will be sent to the Local Reporting System Manager. The Local Reporting System Manager is the P&D Business Partner Lead for the Spanish region. When the Local Reporting System Manager is absent, a P&D Manager for the Spanish region will substitute him/her. Also, if the Report concerns the Local Reporting System Manager, the Reporter can direct his/her report to the Head of People Business Partnerships, EMEA or the board of directors.

The Reporter will receive an acknowledgement of receipt within 7 days of receipt of the report.

The initial report will be reviewed by the Local Reporting System Manager who can request the support of other teams depending on its nature and purpose, for completing a preliminary assessment and investigating. Among others, the Local Reporting System Manager may request the assistance of Legal Department, Internal Audit Department, Asset Protection, People & Development, Global People and Practice, Finance or IT. The Local Reporting System Manager may also request the assistance of external advisors. All of this while guaranteeing the confidentiality of the information and providing specific personal data strictly on a need-to-know basis.

The report will be handled by specially trained employees: Legal Department, Internal Audit Department, Asset Protection, People & Development, Global People and Practice, Finance, IT.

To facilitate processing, the report should clearly and precisely detail the facts and behaviour in question. The Reporter may provide any element that could support the facts reported.

## **6. Investigation**

Upon receipt of the report, the Local Reporting Channel Manager shall make a preliminary assessment as to whether the facts reported are within the material scope of this Policy (and therefore considered "In-Scope Breaches"), as well as the consistency and plausibility of the facts reported, and may request additional information from the Reporter if deemed necessary.

Once this preliminary assessment has been made, the Local Reporting Channel Manager will either:

**a) Reject the report:**

- When the facts reported lack any credibility,
- When the facts reported do not fall within the material scope of application of this Policy,
- When the allegation is manifestly unfounded,
- When, after requesting further information or documentation from the Reporter (if identified), this is not received and it is not possible to initiate an investigation without such additional information,
- Where there are indications that the information provided has been obtained in an unlawful manner, such information shall be rejected, and such rejection shall be communicated to the Reporter. Notwithstanding the above, the Local Reporting Channel Manager may decide to continue the processing of the complaint considering the lawful information, if possible.
- When the report does not contain new and significant information or is a mere reproduction of a report previously rejected or duly investigated and resolved.

In such cases, the Local Reporting Channel Manager shall record the receipt of the report and the decision taken to reject a report (and the reasons for this). When the reported facts do not fall within the material scope of application of this Policy, the Local Reporting Channel Manager shall inform the Reporter whether it is appropriate to refer the reported facts to another department or person for the management of the same (e.g. his/her line manager, HR or others).

**b) Admit the report** and start an investigation process. The investigation should be carried quickly, efficiently, and confidentially. Information about the report and the investigation will be disclosed to those with a specific need to know. During the investigation process, it is possible that the team in charge of the investigation could request additional information from the Reporter.

Following the investigation, depending on the outcome of the same, prompt and appropriate corrective and/or disciplinary actions could be taken in accordance with existing policies and procedures.

## **7. Processing anonymous alerts**

The processing of anonymous alerts requires specific safeguards and precautions.

Anonymous reports can only be processed if they are sufficiently detailed. The Local Reporting System Manager will initially assess whether the report contains sufficient information to allow for further investigation.

If this report is to be shared with other persons or departments with Ralph Lauren, it will be accompanied by a statement that it has been submitted anonymously.

## **8. Updating the Reporter**

Where required by applicable law, the Reporter (if identified) will be informed as soon as possible, of its admissibility. The Reporter will be kept informed of the progress and results of the investigation. However, such information must not compromise the investigation or involve the disclosure of confidential information. Whether and to what extent the Reporter should be informed will be decided on a case-by-case basis in accordance with applicable law.

In any event, the Local Reporting Channel Manager will contact the Reporter in writing within three (3) months of initial receipt of the report or, if no response is received, within three months of the expiration of a period of seven calendar days following the report, to respond to the investigative actions, providing summary information on the steps planned or taken to follow up on the complaint and address the alleged breach reported. In cases of particular complexity requiring an extension of the three (3) month maximum period, this may be extended by up to a maximum of three (3) additional months.

## **9. Notification to the Accused person**

### ***9.1 Notice***

The person who is the subject of the alert shall be notified of the facts alleged against him/her. Any investigation shall be conducted with full respect for the honour, the presumption of innocence and the right of defence of the Accused person, preserving his or her identity and guaranteeing the confidentiality of the facts and the data of the internal investigation.

However, some restrictions may apply:

- The Accused person should only be informed of facts that concern him or her. In particular, the identity of the Reporter will not be transmitted to him/her.
- The Accused person does not have right to obtain information about the investigation.

### ***9.2 Timing of the Notice***

Except in extraordinary circumstances (e.g., related to the volume and/or complexity of the information submitted), any notification will be made as soon possible, normally within a few working days of receipt of the report. However, if Ralph Lauren reasonably believes that the Accused person is in a position to destroy data, alter records or compromise the investigation, notification may be delayed until appropriate safeguards (such as data back-up, physical security of files) are in place to prevent the destruction, loss or alteration of evidence.

## **10. No Retaliation**

The Reporter shall not be subject to any adverse treatment for making a report under this Policy, provided that the report was made in good faith, even if the alert is later found to be unsubstantiated or inaccurate or if Ralph Lauren decides to close the case. Also, the following individuals will be protected against retaliation:

- The legal representatives of employees in the exercise of their functions of advising and supporting the Reporter.
- Individuals who, within the organization in which the Reporter works, assist the Reporter in the process;
- Individuals who are related to the Reporter and who may suffer reprisals, such as co-workers or relatives of the Reporter,
- Individuals for whom the Reporter works or with whom he/she has any other type of relationship in an employment context or in which he/she has a significant shareholding.

Adverse treatment includes:

- Suspension, lay-off, dismissal or equivalent measures;
- Demotion or refusal of promotion;
- Change of workplace, reduction in salary, change in working hours;
- Refusal of training;
- A negative performance assessment (not justified);
- Disciplinary measures;
- Coercion, intimidation, harassment or ostracism;
- Discrimination, disadvantageous or unfair treatment;
- Damage, including to the person's reputation, particularly on social networks, or financial loss, including loss of business and loss of income;
- Early termination or cancellation of a contract for goods or services or refusal to renew such a contract.

Any employee who attempts to retaliate, directly or indirectly, or encourages other employee(s) to retaliate against bona fide Reporter may be subject to disciplinary action or judicial proceedings, to the extent permitted by applicable law.

Reporters who have reported in accordance with this policy will not be considered to have breached confidentiality and shall not incur any liability in this regard provided that they had reasonable grounds to believe that the disclosure of such information was necessary to reveal a breach.

This protection does not extend to Reporters who knowingly or recklessly make statements or disclosures in bad faith (e.g., where they allege facts that they know to be false). In such circumstances, the Reporter may be subject to disciplinary action or judicial proceedings in accordance with applicable law.

## **11. Data Subjects' Rights**

### ***11.1 Right of Access***

Any person (the Reporter, the Accused person, the witnesses) has the right to obtain confirmation that Ralph Lauren maintains personal data about them in connection with the report and, where appropriate, to request access to and receive details of such personal data.

The request for access must contain either the identifier allocated to the Reporter when he/she entered the alert, or the unique number allocated to the alert.

The response to the access request may take one of the following forms:

- The provision of requested information, to the extent permitted by applicable law,
- The provision of copies of documents containing the personal data pertaining to the person requesting access,
- The provision of a list of the personal data of the applicant contained in the documents.

Responses to access requests should not be aimed at identifying the Reporter, as his/her identity may only be revealed to public authorities.



Ralph Lauren may refuse requests for access if they are obviously abusive, particularly in view of their number, extent or repetitiveness.

The DPO will be informed as soon as possible of any access request made in the context of an alert.

Any decisions on access request will be taken on a case-by-case basis, depending on the circumstances, and in conjunction with the DPO.

### ***11.2 Right of Rectification***

Any person whose personal data is inaccurate or incomplete can request that it be rectified. This can happen, for example, when a person has been mistakenly named or when the accusations against him or her are based on incorrect data.

The right of rectification only allows a person to correct material errors. However, it is not intended to allow the Accused person to challenge the allegations made against him or her.

The request for rectification must contain either the identifier allocated to the Reporter when he/she entered the alert, or the unique number allocated to the alert. The DPO will be informed as soon as possible of any request for rectification made in the context of an alert. Any decision to grant a request for rectification will be taken on a case-by-case basis, depending on the circumstances, and in conjunction with the DPO.

### ***11.3 Right of Erasure***

The right to erasure applies where:

- personal data are no longer required and/or,
- personal data have been unlawfully processed, and/or,
- personal data have to be erased to comply with applicable legal provisions and/or,
- the person objects to the processing of his/her personal data and Ralph Lauren has no overriding legitimate grounds for the data processing.

The right of erasure is not absolute. For example, a person cannot request the deletion of his/her personal data when the processing of such data is necessary for Ralph Lauren to establish, exercise or defend legal claims.

Any decision to grant a request for deletion of personal data will be taken on a case-by-case basis, depending on the circumstances, and in conjunction with the DPO.

### ***11.4 Right of Restriction***

A person may request restriction of the processing of his/her personal in any of the following circumstances:

- the person disputes the accuracy of the personal data (in which case the personal data will no longer be used for the period required by Ralph Lauren to verify the accuracy of such data);
- the processing of this data is unlawful and the person objects to the erasure of the personal data but instead requests the restriction of their use;
- Ralph Lauren no longer needs the personal data for the Hotline (in which case the data must not be used again until Ralph Lauren has verified that its legitimate interest override those of the person).

Any decision to grant a request of restriction will be taken on a case-by-case basis, depending on the circumstances and in conjunction with the DPO.

### ***11.5 Right of Objection***

A person may at any time for reasons relating to his/her particular situation, object to the processing of his/her personal data.

In such a situation, Ralph Lauren will no longer process the data unless Ralph Lauren demonstrates that:

- It has a compelling legitimate interest overriding the interests or fundamental rights and freedoms of the person making the request, or,
- the processing is necessary for the establishment, exercise of defence of legal claims.

However, in the event that the person to whom the facts described in the report or public disclosure exercises the right to object, it will be presumed that, in the absence of proof to the contrary, there are compelling legitimate grounds that legitimize Ralph Lauren to process his/her personal data.

The DPO will be promptly informed of any request to exercise the right of objection.

### ***11.6 Timing***

When a person exercises a right referred to in this paragraph, his/her request shall be dealt with without undue delay and in any event within one month of receipt. This period may be extended by a further two months where necessary, considering the complexity and number of the requests. The person will be informed of any such extension within one month of receipt of the request, together with the reasons for the delay.

## **12. Data Security**

Technical and organizational measures are implemented to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, or unauthorised processing, in accordance with the applicable provisions on the processing of personal data.

Ralph Lauren therefore requires that reports and investigative material be handled in a confidential and secure manner, and in accordance with legal retention periods. All persons with access to such information are bound by enhanced contractual obligation of confidentiality.

Ralph Lauren and its third-party service providers will take all reasonable and appropriate precautions to preserve the confidentiality and security of the personal data when it is collected, disclosed, or stored.

## **13. Data retention**

Personal data may only be retained for the time necessary to decide on the appropriateness of initiating an investigation on the facts reported. In any case, the personal data should be deleted or anonymised after three (3) months have elapsed from the receipt of the report without any investigation having been initiated, unless the purpose of the storage is to leave evidence of the operation of the system.

Once a report has been investigated and the procedure closed, personal data will be destroyed or archived as soon as possible and at the latest within two (2) months of the conclusion of the investigation, unless the reported facts give rise to disciplinary or judicial proceedings or it is necessary to keep the data for a longer period of time to preserve Ralph Lauren's defence right. If the event of disciplinary or judicial proceedings, personal data will be kept until the final decision.

If personal data is archived, it will be anonymised beforehand.

#### **14. International transfer of personal data in the context of the Hotline**

Information provided via the Hotline will be stored on servers hosted by NAVEX Global in the U.S. As Ralph Lauren is a global company, personal data provided via the Hotline may be transferred to other Ralph Lauren entities, including in the U.S. and Switzerland. Ralph Lauren has organisational measures in place to secure data in the event of international transfers. For more information on how your personal data is processed and may be transferred abroad, please refer to the Data Protection Notice, available at the following link: <https://secure.ethicspoint.eu/domain/media/en/gui/57948/data-privacy.pdf>

#### **15. External providers**

Ralph Lauren may use external service providers to assist during the preliminary assessment or investigations of the reports received or to store or archive personal data. In such a situation, Ralph Lauren will contractually ensure that such external providers comply with this policy and Ralph Lauren's instructions, including:

- Not to use personal data for purposes other than that for which it was collected,
- Respecting confidentiality standards,
- Comply with data retention requirements,
- Return or destroy all personal data processed in the context of the Hotline and any copies thereof, on completion of the services,
- Comply with the rules applicable to the international transfer of personal data.

#### **16. Relationship with external reporting channels**

The law recognizes that in some circumstances it may be appropriate for persons covered by this policy to report their concerns to an external body. Ralph Lauren nevertheless strongly encourages such persons to first use the internal channel implemented by Ralph Lauren so that any concerns can be resolved appropriately and quickly and encourages to seek advice before reporting a concern to anyone external.

Should the Reporter decide to report their concerns externally in compliance with applicable provisions, they can report to the Independent Authority for the Protection of Informants or the corresponding independent authorities for the protection of informants created at regional level.

Questions or comments about this Procedure should be directed to the Legal department.

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*This Policy is effective as of 1<sup>st</sup> August 2024 It may be modified by Ralph Lauren at any time, in particular to comply with changes in legislation, its organization and its internal procedure.*

## ANNEX A – DEFINITION OF REPORTABLE VIOLATIONS AND BREACHED

### 1. Anti-competitive practice

<b>Improper dealing with competitors</b>	Oral or written agreements, arrangements, or understandings with competitors to fix prices, control resale prices, boycott specific suppliers or customers, submit bids or offers, allocate products, territories or markets, or exchange competitively sensitive information, as well as discussions regarding price, trade allowances or rebates, costs, competition, marketing plans or studies, production plans and capabilities or any other confidential information.
<b>Improper use of competitor or supplier information</b>	Improper, unauthorized, or unlawful use, gathering, receipt or disclosure of non-public confidential information or trade secrets about competitors or suppliers.
<b>Breach of state aid rules</b>	Breach of the laws relating to governmental aid or public assistance provided by any State or governmental entity (including grants, interest and tax reliefs or credits, guarantees, loan or investment aid, subsidy, financial assistance, or provision of services on preferential terms).

### 2. Discrimination or harassment in the workplace

<b><u>Discrimination</u></b>	Uninvited and unwelcome verbal or physical conduct or other unfair treatment directed at an employee, because of his or her gender, religion, race, ethnicity, sexual orientation, or any other category protected by applicable law. Examples include: verbal and/or physical harassment, bias in hiring, bias in assignments, discriminatory termination, bias in promotions, bias in educational decisions, unfair compensation or inappropriate language.
<b><u>Harassment</u></b>	Repeated comments or behaviour, whether or not of a sexual nature, which have the purpose or effect of violating the dignity of a person by being degrading or humiliating, of creating an intimidating, hostile or offensive environment, or of degrading working conditions, likely to infringe on the right to dignity, to impair physical or mental health or to compromise professional prospects.

### 3. Ralph Lauren Employee misconduct and relations

<b>Conflict of interest - Personal</b>	Any personal interest, any business or professional activity or relationship, prior or current employment, or any obligation that may interfere with the ability to objectively perform job duties and responsibilities or impair independence and objectivity.
<b>Offensive or inappropriate communication or behaviour – other than discrimination or harassment</b>	Use of inflammatory, derogatory, insulting, or bullying communications or statements in the workplace.
<b>Retaliation</b>	Statements or actions discharging, demoting, suspending, threatening, harassing, discriminating, excluding or otherwise creating a more unpleasant work environment against an employee because of any lawful act taken by such employee in connection with reporting a violation of law or policy, filing a complaint, or assisting with an investigation or proceeding.
<b>Unfair employment practices – other than discrimination or harassment</b>	Employment decisions, practices, disciplinary actions, or terminations that are believed to be unfair regardless of whether they are the result of job performance, changes in business needs or other business-related decisions.
<b>Time abuse or fraud</b>	Concerns about an employee who is falsifying his or her work hours.
<b>Theft or misuse of company products, tools or materials</b>	Unauthorized removal or taking of Company merchandise, supplies, equipment, furniture, products, cash, merchandise, or other tangible property, or improper, unauthorized or unlicensed use of Company property or resources for non-business-related reasons or purposes, including improper use of systems.

### 4. Environmental, Health and safety

<b>Danger to workplace health &amp; Safety</b>	Conduct or action which may cause or result in potentially hazardous conditions that impact the health, safety or environment of employees, suppliers, customers, or others.
<b>Substance abuse</b>	Unlawful use, possession, sale, conveyance, distribution, concealment, transportation or manufacture of illegal drugs, intoxicants, controlled substances, or drug paraphernalia in the workplace or while conducting business. Inappropriate or excessive consumption of alcohol in the workplace or while conducting business.
<b>Violation of environmental, health or safety laws and regulations</b>	Conduct or action which violates laws, regulations, standards or policies relating to environment protection (including any potentially hazardous condition affecting the environment), health and safety, food and feed safety, or animal health and welfare.
<b>Transport safety</b>	Breach of transport safety in all forms of transportation (for road, maritime, rail and air shipments) which can endanger human lives.
<b>Violence or threats of violence at the workplace</b>	Intimidating behavior, threats or threatening behavior or acts of violence against employees, visitors, guests, or property.

## 5. Consumer safety and protection

<b>Consumer protection</b>	Breach of laws relating to consumer protection (for instance, in relation to defective or faulty products, deceptive, misleading, or fraudulent business practices, unfair terms in consumer contracts, etc.).
<b>Product safety &amp; compliance</b>	Breaches related to dangerous products present on the market; complaints about product effectiveness; allegations of product tampering; violation of policies or practices for manufacturing controls; or allegations of non-compliance with product standards.

## 6. Financial, accounting, auditing, bribery and banking matters

<b>Bribery / Corruption</b>	Payments, payments in kind, gifts, bribes, kickbacks, extensions of credit or benefits extended to or received by customers, employees, suppliers, vendors, competitors, directors, officers, auditors, government employees, government officials or agencies, or other parties that are unlawful, improper, or designed to influence business decisions or political processes.
<b>Conflict of interest – Financial</b>	Any financial interest, any business or professional activity, prior or current employment, or any obligation that may interfere with the ability to objectively perform job duties and responsibilities or impair independence and objectivity.
<b>Falsification of records</b>	Altering, fabricating, falsifying, or forging all or any part of a document, contract, or record for the purpose of gaining an advantage, or misrepresenting the value of the document, contract or record.
<b>Financial fraud</b>	Falsification of financial statements in order to obtain some form of improper benefit.
<b>Improper accounting and auditing practice</b>	Statements or actions that violate or conflict with either internal policies, procedures, or practices or government regulations related to the detailed reporting of the financial state or transactions of an organization or the examination, verification, or correction of its financial accounts.
<b>Theft of company funds or embezzlement</b>	Theft, misappropriation, or conversion of money or funds placed in one's trust, or which belong to the Company or employer.
<b>Trading on inside information</b>	Purchase or sale of stock or other securities based on non-public and material information obtained during the course of employment or providing such information to another person who purchases or sells stock or other securities based upon that information.
<b>Corporate tax evasion or offence</b>	Breach of corporate tax laws or arrangements to unlawfully avoid or minimize tax liability or obtain a tax advantage that goes against the object or purpose of the applicable corporate tax laws.

<b>Unauthorised use of company assets or funds, money laundering and terrorist funding</b>	Improper, unauthorized, or unlicensed use of Company property, resources or funds for non-business-related reasons or purposes, money laundering and/or terrorist financing in which economic, financial, and commercial transactions are carried out for the purpose of making illicit funds appear legitimate or facilitate the perpetration of terrorist actions.
<b>Abuse or fraud with company benefits</b>	Improper, misleading, or deceptive actions taken, falsification of records, or misrepresentation of physical conditions related to benefits plans.

**7. Data protection, IT Security and confidentiality**

<b>Breach of data protection &amp; privacy policy</b>	Violation of any applicable law, regulation, or company policy applicable to the privacy, confidentiality or security of personal data or personally identifiable information (PII).
<b>Data breach or security incident</b>	Breach of security leading to the accidental or unlawful destruction, loss, alteration or unauthorized disclosure of or access to data which is being held, stored, transmitted or processed in any way (e.g. unauthorized attempt to access Company systems or data, successful phishing attack, malware attack, theft or loss of Company laptop, tablet, mobile phone or portable device, data sent to an incorrect recipient, etc.).
<b>Security of IT system</b>	Any event indicating that the Company's systems or data have been compromised or that measures put in place to protect them have failed.
<b>Unauthorised disclosure of confidential information</b>	Disclosure or release of Company's (or Company's business partners') confidential or proprietary information to persons or parties who are not authorized to receive it.