

Anti-Bribery and Corruption Policy**Policy Statement**

Tapestry, Inc. and its subsidiaries (collectively, the "Company") strictly prohibits all forms of bribery and corruption. The Company is committed to conducting itself in accordance with the highest standards of business ethics and the laws of the countries in which we operate.

This Anti-Bribery and Corruption Policy (the "Policy") reiterates our commitment to integrity and explains the specific requirements and prohibitions applicable to our operations that are intended to reduce the risk of bribery and corruption occurring in the Company's activities.

Anti-Corruption Laws

Not only does Tapestry prohibit all forms of bribery and corruption, it is illegal in many jurisdictions to give or receive a bribe (when dealing with Government Officials and in commercial transactions). Anti-corruption laws exist worldwide, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. These laws have both criminal and civil penalties that can be applied against corporations and individuals. Prosecutions often include charges of other criminal violations, such as mail and wire fraud, money laundering, and conspiracy, and may lead to civil claims against the Company, loss of goodwill, and other sanctions such as debarment from government contracts.

Scope

This Policy is applicable to all of the Company's operations worldwide, including all subsidiary operations, and to all of the Company's directors, officers, employees, agents and other third-party representatives acting on behalf of the Company (collectively, "Employees").

Bribes are Prohibited

Giving, paying, promising, offering, or authorizing the payment of or requesting, agreeing to receive or accepting anything of value, directly or indirectly through a third party, to obtain, keep or confer business or some other improper business advantage or otherwise violate anti-corruption regulations is prohibited.

Employees should:

- Make sure that all transactions are transparent to reduce the risk of a bribe or kickback

SCOPE

Global

SECTION

Compliance

ISSUED BY

Legal Department

DATE ISSUED

9/25/2023

EFFECTIVE DATE

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- Make sure gifts, hospitality and travel expenses are lawful, reasonable, are for legitimate business purposes, and are in compliance with the Company's [Gifts and Entertainment policy](#) including reporting in the [Compliance Portal](#) (Key Prohibition: When dealing with Direct Service Providers ("SP") (third parties that are involved in manufacturing product for Tapestry) and Raw Material Suppliers ("RMS"), including through intermediaries, all gifts and entertainment, except for business meals, are prohibited)
- Avoid hiring decisions that benefit Government Officials or their family members
- Avoid making political contributions when acting as a Company representative in accordance with the Company's [Political Activities and Contributions policy](#)
- Avoid charitable contributions that personally benefit a Government Official or are made as part of an exchange of favors with the official
- Whenever possible, avoid making cash payments of any kind to a third-party, particularly to any individual, and take great care if such payments are made

Preclearance Requirements: Government Officials

Paying, authorizing payment, promising, offering anything of value to a Government Official on behalf of the Company requires preclearance by the Legal Department. This includes payments to third parties where the Employee knows, or has reason to know, that the third-party will transmit any part of the payment to a Government Official or the payment is made on behalf of or at the direction of the Government Official.

Types of Payments Permitted

Anti-bribery and corruption laws do not prohibit all payments to Government Officials. To ensure legal compliance, any of the payments listed below must be pre-authorized by the Legal Department and accurate records of the payment and its purpose must be maintained.

Gifts. Gifts of reasonable value may be given to a Government Official as a courtesy or to promote Company products or goodwill; never to obtain an improper business advantage or influence governmental decision-making. These gifts must be reasonable in value and should generally bear a trademark of the Company or be one of its products. See the Company's [Gifts and Entertainment Policy](#) for additional detail.

Hospitality and Marketing Expenses or Pursuant to a Contract. The Company may pay the reasonable cost of a Government Official's meals, lodging or travel if, and only if, the expenses are permitted by applicable law, are bona fide, reasonable, and directly related to the promotion, demonstration or explanation of Company products or services, or the execution of a contract with a government agency. See the Company's [Gifts and Entertainment Policy](#) for additional detail.

Facilitating or Expediting Payments. While some laws may contain a very narrowly construed exception from the bribery prohibitions for "facilitating or expediting payments," such payments are

not legal under the laws of most countries. It is Company policy to avoid these types of payments whenever possible. Facilitating or expediting payments are payments intended to gain access to, speed up receipt of, or secure the performance of a "routine" (non-discretionary, non-decision-making) governmental action. If you are ever asked to make a payment like this, immediately contact the Legal Department for guidance on how to proceed by sending an email to GlobalCompliance@tapestry.com.

Emergency Situations. In the event of an emergency where a payment to a Government Official is required to preserve personal health or safety, and the required pre-authorization from the Legal Department cannot be obtained, the payment may be made. Information regarding the payment must be provided to the Legal Department as soon afterward as is safe and practicable.

Definitions

Anything of Value

Payments that violate anti-bribery and corruption laws may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. These laws prohibit giving "anything of value" for an improper purpose. This term is very broad and can include, for example:

- Gifts (including Tapestry brand products)
- Travel, meals, lodging, entertainment, or gift cards
- Loans or non-arm's length transactions
- Charitable or political donations
- Business, employment, or investment opportunities

Bribe

A bribe is where something of value is offered or given with the intent to improperly obtain business or corruptly influence a business decision. Some factors to consider when evaluating the propriety of a payment: Is the intent anything other than building a business relationship, promoting company products, or common courtesy? Might offering or accepting a gift or invitation create the appearance of impropriety, e.g., would you feel uncomfortable if the details were exposed, like being printed in a newspaper?

Commercial Bribery

Commercial bribery is when something of value is given to or received from a current or prospective business partner with the intent to improperly obtain business or corruptly influence a business decision. The Company's directors, officers, employees, and Agents shall not offer, promise, authorize the payment of, or pay or provide to and shall not request, agree to receive, or accept anything of value from any employee, agent, or representative of another company to induce or reward the improper performance of any business-related activity.

Government Official

The term government official is defined broadly and includes anyone acting in an official capacity for a government department or agency, military organization or a public international organization, including political parties, candidates, and those working in state-owned entities, and any of their family members or representatives. Government Officials include but may not be limited to:

- Officers or employees of a government
- Officers or employees of a military organization
- Officers or employees of a state owned or controlled enterprise
- Officers or employees of a public international organization (such as the United Nations, World Bank or the European Union)
- Officials of political parties
- Candidates for public office
- Members of Royal Families
- Politically Exposed Persons (PEPs) who are those that may have held government office or have a close connection to and influence with one who does hold government office
- Anyone acting on behalf of any of the above

Charitable Donations

It is never permissible to provide a donation to improperly influence a government official, or in exchange for any improper favor or benefit. It may, however, be permissible to make donations directly to a government agency (rather than to an individual Government Official) as part of a charitable effort. All charitable contributions require advance authorization according to Company policy and must be accurately recorded in Company's books and records.

If the Company plans to engage in charitable giving as part of legitimate local outreach, employees responsible for choosing organizations must ensure that:

- The charity is legitimate and reputable
- The donation is reasonable in nature and amount
- The donation will be used for a charitable purpose
- The donation will not provide an improper benefit to a Government Official
- The donation will not result in an improper advantage or benefit for the Company

Political Contributions

Company contributions to candidates for political office (considered Government Officials) are prohibited unless pre-authorized by the Legal Department. See the Company's [Political Activities and Contributions Policy](#) for additional detail.

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Accounting and Record Keeping

In addition to prohibiting bribery, some anti-corruption laws require companies and their majority-owned affiliates to maintain adequate internal controls, keep accurate and complete records of the transactions they undertake, and make good-faith efforts to cause the ventures in which they own minority interests to keep such records and maintain proper internal controls. It is the Company's policy to implement and maintain internal accounting controls based upon sound accounting principles. All accounting entries in the Company's books and records must be timely and accurately recorded and include reasonable detail to fairly reflect transactions.

All transactions involving the provision of anything of value to a Government Official must occur only with appropriate Company authorization. Documentation must include the name and position of the Employee requesting and authorizing the transaction; the name and position of the Government Official involved in the transaction; a full description, including the value, of the payment or provision of anything of value, and where applicable, a description of the Company's products or services being promoted or the relevant contractual provision if the payment was made pursuant to a contract. For gifts and entertainment, please see the Company's [Gifts and Entertainment Policy](#) for further information and the required steps to obtain authorization.

Third Party Engagement and Management

Employees must be diligent in engaging with and managing third parties whether they be consultants, service or material providers, contractors, agents or business partners. In some instances, the actions of a third party may be attributable to the Company. The Company has specific rules relating to due diligence, acceptable contract terms, and monitoring of all third parties, and particular care is required when a third party may interact with a Government Official on behalf of the Company. See the Company's [Global Indirect Procurement Policy](#) and [Onboarding Service Providers Guidelines](#) for more detail.

Generally Applicable Due Diligence Requirements

Screening. All Third Parties must be screened to identify Government Officials, sanctioned entities/individuals, past or potential corrupt activity by third party. If engaged, ongoing monitoring of the third party must be conducted.

Dealing with Government Officials. Employees must identify if it is reasonably likely that the third party will be dealing with Government Officials on behalf of the Company, and notify the Legal Department for that possibility to be considered in the contract terms.

Contract terms. The Legal Department must be engaged to prepare/review contract. Relevant contract clauses may deal with audit rights, certain representations and warranties, third party acceptance of the

Company's Corporate Standards - which include this Anti-Bribery and Corruption policy. For third parties that will not deal with Government Officials on behalf of the Company, a contract clause prohibiting such activity may be utilized.

Monitoring. Employees must maintain awareness of the third parties they engage, and inform the Legal Department if a third party exhibits any of the following behavior:

- Rumors of, reputation for or actual bribery or attempted bribery
- Minimal, unclear, non-transparent, or incorrect details on invoices or expense claims
- A third party's close relationship with a government official or insistence on using a specific consultant, particularly one who provides little to no obvious, arm's length value

Business Combinations and Joint Ventures

Business combinations such as mergers and acquisitions and joint ventures present special anti-corruption concerns, including the risk of one entity being held accountable by authorities for the past or continuing corruption issues of the other. It is Company policy to perform an effective and thorough due diligence review before effectuating any business combination or joint venture.

Employees must contact the Legal Department before entering into a joint venture, completing a merger or acquisition, or undertaking a new market entry to receive guidance about how to address the anti-corruption aspects of the proposed transaction.

Anti-Bribery and Corruption Training

To ensure that Company Employees are thoroughly familiar with the provisions of this Policy and applicable anti-bribery and corruption laws, the Company periodically provides anti-corruption training and resources to those that are impacted.

Responsibilities

Employees are responsible for reading, understanding and complying with this policy. They must never participate in bribery or corruption. Employees must responsibly engage in due diligence, any indicated mitigation steps, and ongoing monitoring of third parties. They must update screening and oversight as circumstances change.

Business and Functional Management is responsible to review and oversee Employee activity, and make decisions about payments and third party engagement and monitoring. Management is also responsible to monitor any agreed upon mitigation activity.

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The Legal Department is responsible for maintaining this policy. The Legal team will provide guidance on third party and project specific due diligence, contracting and engagement, and in certain circumstances approval/declination of payments.

Legal Department Contact

Some situations are complex with multiple factors to consider beyond those described in this Policy. Please contact a member of the Legal Department with any questions by sending an email to GlobalCompliance@tapestry.com.

Reporting Policy Violations, Duty to Cooperate, No Retaliation

You are required to immediately report any suspected violations of this policy (including any solicitations or extortion attempts), and to cooperate with any investigation. The Company views failure to cooperate with an investigation as a breach of obligation to the Company. **You must report violations to the Legal Department or by contacting the Tapestry, Inc. Ethics and Compliance Reporting System online at www.tapestry.ethicspoint.com.** It is unlawful and expressly against Tapestry policy for anyone to retaliate against any employee either for good faith reporting of violations of this policy or for cooperating with an investigation.

Discipline

Violations of this policy are subject to disciplinary action up to and including termination of employment, or legal action, whether during or after your employment. Third party representatives who violate this Policy may be subject to termination of all commercial relationships with the Company.

Related Policies

[Compliance Portal](#) (accessible on the Legal Resources page on the Loop)

[Gifts and Entertainment Policy](#) (accessible on the Legal Resources page on the Loop)

[Conflicts of Interest Policy](#) (accessible on the Legal Resources page on the Loop)

[Financial Crime Policy](#) (accessible on the Legal Resources page on the Loop)

[Political Activities and Contributions Policy](#) (accessible on the Legal Resources page on the Loop)

[Global Indirect Procurement Policy](#) (accessible on the Loop)

[Onboarding Service Providers Guidelines](#) (accessible on the Loop)

[Supplier Code of Conduct](#) (accessible on the Legal Resources page on the Loop)

[Supplier Code of Conduct](#) (Internet page)

[Global Business Integrity Program](#) (Internet page)