

# FARFETCH

## GLOBAL SPEAK UP POLICY

### A. OVERVIEW

We're proud to have a thriving international presence, operating in multiple regions and jurisdictions in full compliance with global legislation. At FARFETCH, we are dedicated to our BE HUMAN value and making sure that all Farfetchers feel welcomed, safe, and respected at work, including work related events during or outside work hours, in alignment with our [Code of Business Conduct and Ethics](#) policy ("Code") and FARFETCH values. In order to have a successful speak up culture, we must collectively create a space for psychological safety where employees feel safe to ask for help; admit a mistake; or raise concerns of wrongdoing.

### B. WHAT IS THIS POLICY ABOUT ?

The following Speak Up Policy (this "Policy") laid out here is intended to provide an overview and guidance on the lifecycle of concerns raised and what to expect when you speak up. This Policy serves as a set of rules and guiding principles to help you when you are considering raising a concern.

Our Speak Up culture at FARFETCH empowers all Farfetchers to speak up when you witness, become aware of, or suspect wrongdoing at FARFETCH. We all have a duty to hold each other accountable as we promote ethical behaviour in our daily work. As a company, we encourage you to Speak Up at all times - and you should feel free to use any of the Speak Up Channels available to you to raise concerns and to ask any questions (when in doubt) about the best course of action in any particular situation.

### C. APPLICABILITY

This Policy applies to all employees within the FARFETCH Group, globally (whether full-time or part-time and including employees at all business units and platforms). It also applies to all internal and external individuals who interact with the FARFETCH Group such as consultants, contractors, customers, suppliers, business partners, and any third parties. Collectively "Covered Persons".

### D. WHAT TO REPORT

As a Farfetcher, you must report:

- Any known or suspected violation of:
  - Any section of our Code;
  - Other FARFETCH policies;
  - The laws, rules, regulations that apply to FARFETCH or Farfetchers;
- Any concerns about accounting, internal accounting controls, auditing matters;

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- Questionable financial practices such as bribery, banking, and financial crime; and
- Any other unethical behaviour by any Farfetcher, anyone purporting to be acting on FARFETCH's behalf or any third-party partners working with FARFETCH.

## E. HOW TO REPORT

FARFETCH has five channels anyone can use to Speak Up (our "Speak Up Channels"). These are people and resources that you can turn to if you want to report an issue or raise a concern, have questions or need some guidance.

Our five Speak Up Channels are:

- your line manager or a manager you trust;
- your People Business Partner or a People Business Partner you trust;
- the FARFETCH Ethics & Compliance Team at [speakup@farfetch.com](mailto:speakup@farfetch.com);
- our Speak Up hotline (via the local telephone numbers listed in Appendix B); and
- our Speak Up [online portal](#) on Convercent.

Our dedicated Speak Up hotline or online portal are operated by a third party partner (Convercent) and reports made on these Speak Up channels are directed to the FARFETCH Ethics & Compliance team, overseen by the Audit Committee of the Company's Board of Directors (the "Audit Committee"). We strongly encourage you to provide as much detail and information in your report when you speak up, this includes providing names, dates, locations, teams, witnesses, and any other relevant information needed for your report. This will help ensure that a thorough investigation is conducted.

The Speak Up hotline and online portal also gives you the option to remain anonymous when reporting (local law permitting). If you are making an anonymous report please include as much specific information as possible, including all information you believe will assist the investigator in reviewing the issue. Anonymous reporting with insufficient information disclosed can result in limitations and delays in handling a concern, including at times inability to conduct an investigation. Anonymous reporting also requires you to communicate via Convercent to the investigator assigned to your case, as they will not have any other way of communicating with you due to your anonymity. You must ensure you check and respond to Convercent if you choose this Speak Up option. If you speak up using any of the other channels, you may no longer be considered anonymous to FARFETCH, as the company has been made aware of your identity. Whether you choose to report anonymously or not, remember your concern will be handled with confidentiality.

As a person who makes a report ("Concern Raiser"), you should also include any and all evidence you have to your report (such as emails, slacks, images, etc.) to allow the investigator to conduct a full review of your matter. However, please do not be deterred from raising a concern because you do not have documentary evidence to include; we understand that some situations will not be supported by evidence of this type.

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## F. INVESTIGATION PROCESS

When you raise a concern, the first thing that happens is that FARFETCH determines whether it is appropriate to start an internal investigation, with regard to our Code, other applicable company policies and applicable laws. If it is determined that an investigation does not need to be conducted, the case will be assigned to your People Business Partner or the relevant Head Of People Business Partnering to support and manage your concern separately.

If it is determined that an investigation needs to be conducted, an investigator or investigation team will be assigned to the case and a formal investigation will be opened. All investigators assigned to a case will serve as a neutral and independent party to the investigation process, and will oversee management of your case without bias.

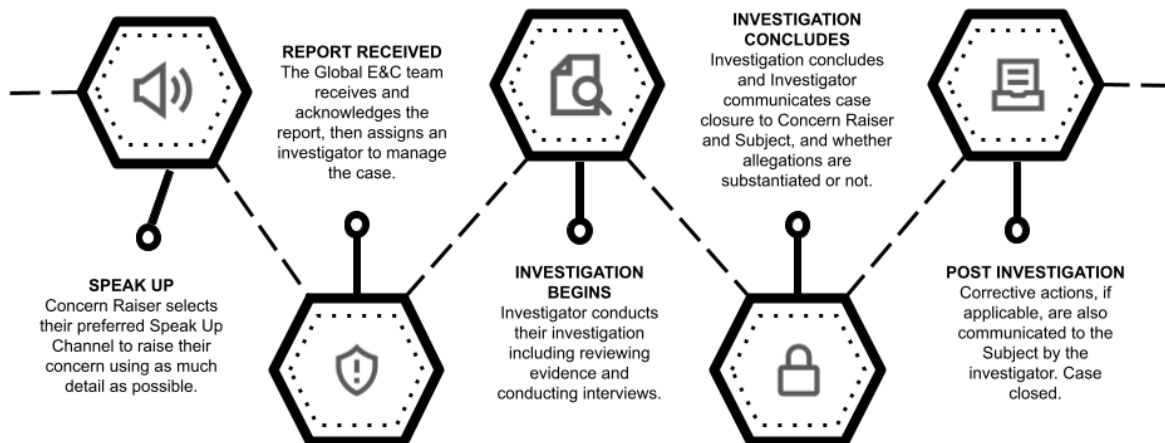
The investigation process typically involves the investigator conducting interviews, reviewing evidence, and a determination as to whether allegations are substantiated or not. Investigators assigned to your case will communicate with you and provide updates on your case until closure, at a reasonable frequency determined by the investigator. Additionally, if applicable (and based on the findings of the investigation), FARFETCH may take appropriate corrective action, in accordance with local laws, such as training, change in policies or process, or disciplinary action up to and including termination.

Additional steps may be taken based on local legal requirements. Local legal counsels assigned to each report will ensure compliance with such rules and regulations. Under limited circumstances, the Subject of a concern (the individual about whom the concern is raised) may have the right to request the presence of another individual during the interview. This request will be reviewed subject to local laws.

Matters involving violations of accounting, internal accounting controls, auditing matters, or other questionable financial practices including bribery, corruption or financial crimes will be escalated to the Audit Committee for review.

Honesty and cooperation are essential to ensuring an effective investigation process and is a condition of your employment with FARFETCH. If someone is determined to have knowingly submitted reports in bad faith, that person will be subject to corrective action up to and including termination. They can also be subject to legal proceedings, especially in the case of false accusations.

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## **Confidentiality**

No matter what Speak Up Channel you use, FARFETCH strives to maintain confidentiality at all stages of the process, to the extent possible, and where permitted by law. We acknowledge that it may be difficult or daunting to Speak Up, however, we strongly encourage you to be honest and reach out regarding any matter – that’s the only way we can do the right thing and support you.

Confidentiality must be observed and respected by all parties involved in an investigation. This means if you are contacted to partake in an investigation, you must follow all rules outlined to you during the process and must not discuss the case with anyone. Failure to uphold confidentiality or violation of the FARFETCH investigation process puts others at risk and could lead to the involved person(s) receiving disciplinary action, up to and including termination.

## **Conflicts Check**

Before an investigator or legal advisor is assigned to a case or before any matter is escalated to any designated person, Ethics & Compliance will review the report for any conflicts to ensure that investigations are conducted without any possibility of error. This includes but is not limited to, reviewing local conflicts, cross regional conflicts, leadership conflicts and legal conflicts. Conflicts will be continuously monitored throughout the investigation until completion.

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## G. NON RETALIATION

FARFETCH strives to maintain a culture in which every Farfetcher is treated with respect and is protected from harassment or discrimination. FARFETCH prohibits any form of retaliation or unlawful discrimination for Speaking Up and raising concerns or making reports, including matters about auditing and accounting. Even if the concern raised later turns out to be factually incorrect, you shall still be protected for Speaking Up in good faith by FARFETCH. If you believe you have been subjected to any harassment, threat, demotion, discharge, discrimination, or retaliation by FARFETCH or its agents, please notify the Ethics & Compliance team at [speakup@farfetch.com](mailto:speakup@farfetch.com) or by using any of the other Speak Up Channels. Farfetchers who are found to have engaged in retaliation will be subject to corrective action, up to and including termination.

## H. MONITORING AND REVIEW

The FARFETCH Ethics & Compliance team will monitor compliance with this Policy, periodically review the Policy's adequacy and effectiveness and implement revisions due to legal requirements, business needs and other reasons that may arise.

## I. REVISION HISTORY

Date	Responsible	Summary of Changes
11/8/2023	Ethics & Compliance	Creation of the policy.

## APPENDIX A

### SPEAK UP PRIVACY NOTICE

This Notice details your rights and obligations in relation to your personal data and the personal data of third parties that you may submit through the FARFETCH Speak Up online portal and hotline service ("Speak Up Line").

Before submitting a report, you will be required to read and acknowledge receipt of these terms.

#### 1. Who operates the Speak Up Line and Why?

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The Speak Up Line is operated by FARFETCH UK Limited (The Bower, 211 Old Street, London, EC1V 9NR) (“FARFETCH”) who have appointed Convercent, Inc. (“Convercent”) located in the United States to operate the Speak Up Line on FARFETCH’s behalf. FARFETCH is the data controller for the purposes of the Data Protection Laws. If you have any questions or concerns about this Notice, please contact FARFETCH Ethics and Compliance team at [compliance@farfetch.com](mailto:compliance@farfetch.com).

## 2. Use of the Speak Up Line

The Speak Up Line is a confidential web and phone-based intake system provided by FARFETCH to its employees, vendors, suppliers, and business partners and those of its subsidiaries (“reporters”). Use of the Speak Up Line is entirely voluntary.

You are encouraged to report possible violations using any of the Speak Up Channels, including but not limited to the Speak Up Line.

In certain countries of the European Union, FARFETCH may only accept reports through the Speak Up Line on limited topics, generally restricted to irregularities in respect of accounting, internal accounting controls, auditing or issues relating to bribery or banking and financial crime only. Further, some countries restrict reports such that only employees in key or management functions may be the subject of a report. If your concern pertains to a matter that, under local law, may not be accepted by FARFETCH through the Speak Up Line, you will need to contact your line manager or a manager you trust, people business partner or people business partner you trust, or FARFETCH Ethics and Compliance team to report the matter.

## 3. What personal data and information is collected and processed?

The following personal data and information is processed when you make a report through the Speak Up Line:

- a. your name and contact details (phone number(s), email address(es));
- b. the name of your employer, your employment role or function;
- c. to the extent that you provide information about named individuals, the Speak Up Line provides you with the opportunity to submit the following personal data about such individuals:
  - a. name; and
  - b. description of functions and involvement.
- d. a description of the alleged misconduct, including any potential criminal violations;
- e. a description of the circumstances of the incident, including where it took place;
- f. any supporting documentation;
- g. any information gathered during verification of the reported facts and a summary of the verification process;

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- h. the outcome of the report; and
- i. any other relevant information required to accurately complete or investigate the report or irregularity.

Although reports can be made anonymously through this Speak Up Line where legally permitted, FARFETCH prefers that you identify yourself so that FARFETCH can obtain all facts and properly investigate allegations. All reports, including your details, are treated in confidence. The phone number and email address you provide when completing your report will only be used to contact you regarding your report. Anonymous reporters are encouraged to return to the submitted report to check for feedback and follow-up questions.

Note that depending upon the laws of the country in which you are residing, you may not be able to make the report anonymously; however, your personal information will be treated confidentially to the extent possible and where permitted by law and will only be disclosed and processed as set out below.

#### **4. How will the personal data and information be processed after you submit your report?**

FARFETCH may use your personal data for a variety of purposes. In the case of personal data submitted by means of a report on the Speak Up Line, any provision of personal data by you is completely voluntary and there are no consequences if you submit a report or choose to do so anonymously, provided that the report is submitted in good faith. Please also see Section 7 (Your obligations in relation to the personal data collected and processed) below.

FARFETCH uses the personal data you provide (or that is provided about you) as part of the Speak Up Line to investigate the complaint, review compliance against company policies and procedures and applicable laws/regulations and decide on whether to take any further action (including disciplinary action). FARFETCH carries out such processing in order to comply with legal obligation or where such processing is in the legitimate interest of FARFETCH (e.g., to comply with its legal responsibilities and to run a successful and efficient business).

Any reported information considered to be unfounded or not falling within the scope of the Speak Up Line shall be deleted. In the event the report does not give rise to disciplinary action or legal proceedings, the reported information shall be deleted or securely archived, if permitted by applicable law, within two months of completion of the investigation into the report. If disciplinary action or legal proceedings are commenced as a result of a report to the Speak Up Line, the relevant reported information will be retained until no longer required for such actions or proceedings.

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## **5. Disclosure of personal data and transfers overseas**

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by Convercent in Ireland. Transfers to Convercent are governed by Convercent's Privacy Shield certification.

Once a report is received, it will be reviewed and investigated by relevant individuals including FARFETCH Legal, Ethics and Compliance team, external advisors (e.g. legal advisors) and, in limited circumstances, by technical staff at Convercent.

Depending on the nature or seriousness of the reported misconduct, personal data collected in accordance with this Policy may be transferred to the US and other subsidiaries and affiliates of FARFETCH ("**FARFETCH Group**"). FARFETCH takes all necessary security and legal precautions to ensure the safety and integrity of personal data that is transferred. Where a transfer of personal data within the FARFETCH Group involves a transfer of personal data outside the European Economic Area ("EEA"), FARFETCH and its group companies have standard data protection clauses adopted pursuant to European Commission Decisions 2004/915/EC and 2010/87/EU.

Personal data collected through the Speak Up Line may also be disclosed to the police and/or enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in the EU.

Investigations of reports will be kept confidential to the fullest extent possible, where permitted by law, and in accordance with applicable US and local laws, however, your identity may be disclosed to those investigating the reports so they can follow up with you and ask for further information.

## **6. Your rights in relation to the personal data collected and processed**

Unless provided otherwise by local law, you may have the following rights in relation to your personal data:

- a. to access the personal data held by FARFETCH about you provided it does not adversely affect the rights of others (e.g., the person who submitted the report);
- b. to have your personal data corrected, for example if it is incomplete or incorrect;
- c. in certain circumstances, the right to restrict or object to the processing of your personal data, or the right to delete your personal data; and
- d. the right to complain to the relevant data protection authority.

You may exercise the rights set out at items (a) through (d) above by contacting [privacy@farfetch.com](mailto:privacy@farfetch.com). In the event that you wish to make a complaint about how FARFETCH or Convercent process your personal data, please use the above email address



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and FARFETCH will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the relevant data protection authority as stated at item (d) above.

FARFETCH will promptly notify any person who is the subject of a report to the Speak Up Line, except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information. Subject to this exception, the subject of the report has the same rights as are set out at (a) through (d) above.

## **7. Your obligations in relation to the personal data collected and processed**

It is important that changes in your personal circumstances are updated as soon as possible by contacting your local People Team representative or submitting the change in Workday. These include changes to the following:

- a. name;
- b. contact details;
- c. employee role and function.

Honesty and cooperation are essential to ensuring an effective investigation process. If someone is determined to have knowingly submitted reports in bad faith, that person will be subject to corrective action up to and including termination. They can also be subject to legal proceedings, especially in the case of false accusations.

## **APPENDIX B**

### Speaking-Up Hotlines

1. United Arab Emirates: 8000.3570.3169
2. Australia: 1.800.763.983
3. Brazil: 0.800.892.2299
4. China: 00 400-1200-3062
5. United Kingdom: 00 800 1777 9999
6. Hong Kong: 800.906.069
7. India: 000 800 100 3428
8. Italy: 800.727.406
9. Japan: 0800.170.5621
10. Mexico: 001 866 376 0139
11. Portugal: 800.180.367
12. Russia: 8.800.100.9615
13. United States: 800 461 9330