

RALPH LAUREN

Global People Practices Fair Treatment Policy

Our goal at Ralph Lauren Corporation (“Ralph Lauren”) is to maintain and promote an inclusive and productive work environment that fosters mutual respect, professionalism, and cooperation. The following policies and procedures are designed to achieve these goals through a fair and consistent approach.

Ralph Lauren is dedicated to providing a comfortable and consciously inclusive work environment for everyone regardless of gender identity and expression, race, religion, national origin, sexual orientation, age, marital status, disability, or any other category protected by applicable law. We expect that our employees, vendors and customers treat everyone with respect.

Ralph Lauren believes so strongly in this principle that Ralph Lauren established Global People Practices (“GPP”) and developed the *Hotline* to ensure employees have a safe and impartial place to bring their concerns.

Ralph Lauren will also conduct training on these issues periodically that will be mandatory for employees.

A. Open Communication

Ralph Lauren believes that a policy of open communication is best for all concerned. We also believe that each employee should have the opportunity to make problems or concerns known. Therefore, when an employee wishes to express their problems, opinions, or suggestions, they will find an open door and an attentive listener. We also encourage all Ralph Lauren employees to be open and responsive to the comments or suggestions of other employees. It is the intention of this policy to handle employee problems as efficiently as possible. An employee experiencing a problem is encouraged to first discuss the matter directly with the coworker(s) and/or supervisor(s) involved with the problem. However, if the employee is not satisfied with the response from those individuals, or if the employee feels it inappropriate to speak with them, the employee may discuss the matter with any manager, a member of People and Development and/or GPP.

Misunderstandings, differences of opinion, or conflicts can arise in any organization. To ensure effective working relations, it is important that such matters be resolved before serious problems develop. The professionals in People and Development at Ralph Lauren are available to discuss problems or complaints, to clarify policy, or to provide suggestions. Should a situation persist that an employee finds of particular concern like discrimination, harassment or retaliation, the situation should be handled through the procedure outlined in this Policy and Procedure.

B. Equal Employment Opportunity

It is the policy of Ralph Lauren to base all employment-related decisions on principles of equal employment opportunity, in accordance with applicable law. In particular, it is the policy of Ralph Lauren to:

- recruit, hire, promote, assign, compensate and train highly qualified persons without regard to gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or any other basis protected by applicable law;
- administer all people related actions such as compensation, benefits, transfers, layoffs, discipline, termination, Ralph Lauren-sponsored training, education, and social and recreational programs without regard to gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or any other basis protected by applicable law;
- provide reasonable accommodation where necessary and feasible, and otherwise treat equally, qualified individuals with disabilities; and
- provide a workplace free of prohibited harassment, including sexual harassment.

Ralph Lauren expects each employee to support equal employment opportunities and to comply with all applicable laws prohibiting discrimination in employment. Violations of this policy may result in disciplinary action up to and including termination.

C. Harassment Prevention

Ralph Lauren is committed to providing a work environment free of harassment. Ralph Lauren maintains a strict policy prohibiting sexual harassment and harassment because of gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or any other basis protected by applicable law. All such harassment is prohibited. This policy not only protects employees, but also job applicants, vendors, freelancers and consultants (whether or not they are protected under applicable law).

SEXUAL HARASSMENT

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- submission to such conduct is made a term or condition of employment; or
- submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual; or
- such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive

working environment.

Sexual harassment refers to various forms of offensive behaviors based on sex, behavior that is not welcome and is personally offensive, fails to respect the rights of others, lowers morale and, therefore, interferes with work effectiveness. Sexual harassment may take different forms and may involve members of the same sex. One specific form is the demand for sexual favors. Other forms of harassment include, but are not limited to:

- Verbal: Sexual innuendo, suggestive comments, jokes of a sexual nature, sexual proposition, threats of reprisal for making harassment reports or for turning down requests for sexual favors, or using one's position with the Company to seek sexual favors or otherwise act in a manner that is inappropriate or in violation of this policy.
- Non-Verbal: Dissemination of sexually suggestive objects, cartoons, posters, emails, texts, or pictures, graphic commentary about someone's body or dress, suggestive or insulting sounds, obscene gestures, leering or whistling.
- Physical: Unwanted physical contact, touching, pinching, brushing the body, assault or sexual activity, or impeding or blocking movements.
- Retaliation: Any retaliation for rebuffing any of the above or for making reports or threatening to report sexual harassment.

OTHER TYPES OF HARASSMENT

Prohibited harassment on the basis of gender identity and expression, race, color, religion, sex, national origin, ancestry, age, physical or mental disability, sexual orientation, marital status, veteran status, citizenship status, or other categories protected by applicable law includes behavior similar to sexual harassment such as:

- Verbal conduct such as threats, epithets, derogatory comments, derogatory jokes or slurs;
- Visual conduct such as derogatory posters, photography, cartoons, drawings or gestures;
- Physical conduct such as assault, unwanted touching or blocking normal movement; and
- Retaliation for making harassment reports or threatening to report harassment.

Whatever form it takes, harassment is insulting and demeaning to the recipient and will not be tolerated. All employees, managers and non-supervisors alike must comply with Ralph Lauren's anti-harassment policy and take appropriate measures to ensure that such conduct does not occur. Violations of this policy may result in disciplinary action up to and including termination.

Due to the nature of Ralph Lauren's business, our workplace may expose employees to topics and materials (*such as adult content*) that they may find offensive. Although these topics and materials are a legitimate and an essential aspect of our creative business, we will try to accommodate individuals who find particular topics

or materials offensive. In such situations, employees should notify management in accordance with this policy. Employees who in the course of performing their job duties encounter material they find offensive should also notify management in accordance with this policy.

This list is illustrative only and not exhaustive. Any form of harassment that challenges the inclusivity of our work environment will not be tolerated. It is damaging to our culture and in turn our business.

D. Individuals and Conduct Covered

This Policy applies to all employees and prohibits harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor, manager or by someone not directly connected to Ralph Lauren (e.g., an outside vendor, freelancer, consultant or customer). Ralph Lauren encourages the reporting of all incidents or harassment, regardless of the identity of the alleged offender(s).

Conduct prohibited by this policy is unacceptable in the workplace and in any setting outside the workplace, such as during business trips, business meetings as well as social events with other Ralph Lauren employees.

E. No Retaliation

Ralph Lauren strictly prohibits retaliation against any person by another employee or by anyone representing Ralph Lauren for using the below complaint procedure, reporting discrimination or harassment, objecting to such conduct, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions in any manner or otherwise denying any employment benefit. Violations of this policy may result in disciplinary action up to and including termination.

F. Discrimination, Harassment and Retaliation Complaint and Investigation Procedure & Guiding Principles

Reporting Procedure and Conditions

Ralph Lauren encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Any employee who believes that they have been subjected to prohibited harassment, discrimination or retaliation by a coworker, supervisor, freelancer, client, vendor, or customer of Ralph Lauren, or who is aware of such harassment, discrimination or retaliation of others, should immediately report such conduct. While no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment, discrimination and/or retaliation.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to inappropriate conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be

discontinued. In the event an employee declines to informally confront the alleged offender for any reason or, such informal, direct communication between individuals is ineffective the following steps should be taken promptly.

As a next step, an employee should discuss the issue with their immediate supervisor as soon as possible after the issue arises. In most cases, the supervisor will be able to resolve the matter.

If the employee is not satisfied with the resolution at this point, or the supervisor advises the employee to do so, or the employee feels it is inappropriate to have a discussion with the immediate supervisor, the employee should meet with their People and Development Partner.

If the employee is not satisfied with the resolution at this point, the employee may discuss the issue with GPP, which can conduct investigations.

Regardless of the procedure above, the Global People and Development Department and/or GPP, can be consulted at any time in the process. GPP can also be directly or anonymously contacted via the local contact numbers or the *Hotline* based in the United States at (00)1-877-4POLORL. Alternatively, as another option you can also email GPP at: GlobalPeoplePractices@RalphLauren.com

Each member of management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. Further, employees are responsible for respecting the rights of their coworkers.

Managers at all levels are responsible to act immediately if they know that discrimination, harassment or retaliation may be occurring and **must** report that offense immediately to their People and Development Representative or GPP for guidance in handling these situations.

Employees who become aware of discriminatory, harassing or retaliatory conduct engaged in or suffered by a Ralph Lauren employee, and who prefer not to use Ralph Lauren's open communication policy or have not received a satisfactory response as a result of using the open communication policy, should immediately report that information to their supervisor, their People and Development Representative and/or GPP.

Additionally, employees who believe that they are being discriminated against because other employees are receiving favored treatment in exchange for sexual favors must bring this to the attention of their People and Development Representative and/or GPP.

Investigations

When an employee reports discrimination, harassment and/or retaliation as specified above, Ralph Lauren will engage in a prompt, thorough, and objective investigation appropriate to the circumstances. Investigations will be conducted and usually carried out by GPP. The steps to be taken during the investigation cannot be fixed in advance, but will vary depending on the nature of the allegations and the circumstances of the alleged offense. All investigations will be conducted in a discrete manner and confidentiality will be maintained throughout the investigative process to the extent practicable and consistent with Ralph Lauren's need to

undertake an investigation. Information relating to any investigation, including information provided by an employee or the fact of an employee's participation in any investigation, will be kept confidential to the extent practicable.

Cooperation

Employees who fail to cooperate with an investigation may be terminated or subject to some other disciplinary action. Similarly, employees who refuse to implement remedial measures, obstruct the remedial efforts of other employees, and/or retaliate against complainants or witnesses may be terminated or subject to some other disciplinary action.

As stated above, this policy prohibits any form of retaliation against any employee for filing a bona fide complaint under this policy or for assisting in a complaint investigation. However, if, after investigating any complaint of harassment or discrimination, we determine that an employee has provided false or malicious information regarding the complaint, disciplinary action — including immediate termination of employment — may be taken against the individual who gave the false information.

Resolving the Complaint

Upon completion of the investigation, if necessary and supported by the facts of the investigation, remedial action will be taken against the individual who is the subject of a complaint. Remedial action may include oral or written counseling, referral to formal counseling or training, or disciplinary action including, but not limited to suspension, probation or discharge from Ralph Lauren. If any further incident(s) of discrimination, harassment or retaliation occur, the incident(s) should be immediately reported.

Disciplinary Action

After an appropriate investigation, any employee who is found to have violated this policy will be subject to disciplinary measures, and may also be subject to legal and financial liability. Disciplinary actions can range from a documented warning up to and including termination of employment, depending on the evidence uncovered in the investigation and the nature and severity of the offense.

G. Conclusion

Ralph Lauren has developed this policy to ensure that all its employees can work in an inclusive environment free from harassment, discrimination and retaliation. Ralph Lauren will make every reasonable effort to ensure that all concerned are familiar with these policies and aware that any complaint in violation of such policies will be investigated and resolved appropriately and in a timely manner.

Any employee who has any questions or concerns about these policies or who does not understand how to utilize the complaint procedure under these policies should contact their People and Development Partner and/or GPP.

This policy is part of Ralph Lauren's overall commitment to open communication. Ralph Lauren encourages any employee with workplace concerns of any nature

(including, but not limited to, any alleged discrimination, harassment and/or retaliation) to bring those concerns to the attention of GPP.

This policy is effective as of January 1, 2018. Ralph Lauren policies will comply with local legislation and we reserve the right to update this policy at any time to comply with changes in the legislation and in our internal organization and procedures. The updated version will be communicated to employees.