

# FARFETCH

## CODE OF BUSINESS CONDUCT AND ETHICS

We're proud to have a thriving international presence, doing business in different regions and jurisdictions. This comes with important responsibilities for Farfetchers, and it's critical that we all act in accordance with a single set of principles and the highest standards of business ethics.

The following Code of Business Conduct and Ethics (the "Code") provides and promotes these principles and standards, serving as a guide in your day-to-day activity and helping you to work and make the right decisions. It applies to all Farfetchers (whether full-time or part-time and including employees at all business units), contractors, consultants, or freelancers (together, "Covered Persons" or for the purposes of this Code, "Farfetchers"). All Farfetchers, from senior leadership to new joiners are expected to comply with the Code and the standards it sets.

As a Farfetcher, you're expected to:

- **Comply with this Code at all times.** It's not designed to answer every question that might arise but instead serves as a set of principles in a constantly changing environment.
- **Raise issues and ask questions.** If you have any questions about this Code, or if you feel or know that this Code has been breached, raise the issue using one of our Speak Up channels, including but not limited to, our FARFETCH Ethics & Compliance team at [speakup@farfetch.com](mailto:speakup@farfetch.com).
- **Make the right business decisions.** Apply this Code and other FARFETCH policies every day while doing business as a part of FARFETCH.

# BE HUMAN

At FARFETCH, we strive to promote and maintain an open, honest, and respectful environment and relationships between people. We encourage you to be yourself, look after other Farfetchers and help them become successful. We encourage all Farfetchers to Speak Up whenever you feel you have something to say, need to ask questions or want to raise concerns by following the guidance below.

## SPEAKING UP

Our Speak Up culture empowers all Farfetchers to hold each other accountable as we promote ethical behavior in our daily work. As a company, we encourage you to Speak Up at all times - you should feel free to use any of our Speak Up Channels to raise concerns and to ask any questions when in doubt about the best course of action in any particular situation.

As a Farfetcher, you must report:

- Any known or suspected violation of:
  - Any section of this Code
  - Other FARFETCH policies
  - The laws, rules, or regulations that apply to FARFETCH or Farfetchers;
- Any concerns about accounting, internal accounting controls, or auditing matters;
- Questionable financial practices such as bribery, financial crime, and misuse of funds/Farfetch property; 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.

FARFETCH has three channels anyone can use to Speak Up - people and resources that you can turn to if you have questions, need some advice, or want to report an issue or raise a concern (our “Speak Up Channels”).

The **three** Speak Up Channels are:

- **the FARFETCH Ethics & Compliance Team at [speakup@faretech.com](mailto:speakup@faretech.com);**
- **our Speak Up hotline (via the local telephone numbers listed in Appendix B); and**
- **our Speak Up online portal on [NAVEX](#).**

Our dedicated Speak Up hotline and online portal are operated by a third party and reports made on these Speak Up Channels are directed to the FARFETCH Ethics & Compliance team. The Speak Up hotline and portal give reporters the option to remain anonymous when reporting a concern (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.

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.

When you raise a concern, the first thing that happens is that the Company determines whether it is appropriate to start an internal investigation, following this Code, other applicable Company policies and applicable laws. Once it is done, if applicable based on the results of the investigation, the Company will take appropriate corrective action.

For details on the investigation process and Speak Up Privacy notice, please refer to our [Global Speak Up Policy](#).

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

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.

## **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 Speak Up by notifying 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.

## **PERSONAL DATA**

For more information on how we use your personal data in the context of speaking up, including how long we keep the reports for and how we deal with data transfers and sensitive personal data, please see our Speak Up Privacy Notice below.

## **DIVERSITY, EQUITY AND INCLUSION**

FARFETCH is an equal opportunity employer, and we embrace diversity, equity and inclusion: this means we prohibit discrimination or harassment of any kind. We strive for our workplace to be inclusive and free of discrimination, bullying and harassment based on sex, race (including traits historically associated with race, including, but not limited to, hair texture and protective hairstyles), ethnicity, religion or belief, age, gender identity, gender transition, ancestry, sexual orientation, military or veteran status, marriage and civil partnership, pregnancy and maternity, national origin, citizenship, genetic information, disability (including certain medical conditions) or any other basis protected by applicable law.

Examples of prohibited behaviour include but are not limited to use of racial slurs; sexual harassment or unwelcome touching or physical contact of a sexual nature; or bullying. Workplace bullying can include extreme forms of repeated behaviour, such as violence and intimidation or hostile working environments.

Equality of opportunity and diversity with our workforce and partners is reflected in our daily ways of working. We respect and value individual differences and contributions and will always do our best to create a FARFETCH for all. We expect you to support these principles and uphold our values in your dealings with everyone including internal and external stakeholders, your fellow Farfetchers and our FARFETCH partners.

Our expectation of you is to ensure that these principles and ways of working, reinforced by our values, are consciously embedded in our day-to-day working practices. Any cases of discrimination, bullying or harassment will be investigated and addressed. If you feel you, or any of your colleagues, are being treated unfairly, please contact your People Business Partner or Speak Up using any of our other Speak Up channels.

## **SOCIAL MEDIA AND COMMUNICATION**

Your personal social media is a great channel to help promote the FARFETCH brand and show how proud you are to be a Farfetcher. However, given the growing popularity and reach of social media, we have to work hard to protect our reputation and brand values and be mindful of what we post.

We have a few rules to keep in mind when posting, sending, forwarding, or using material on social media about FARFETCH:

- DON'T — post anything which could:
  - Be offensive, bullying or intimidating;
  - Violate the privacy of another party — either a person or a business;
  - Be illegal;
  - Contain confidential information such as FARFETCH internal presentations, business information, information about a FARFETCH launch etc.; or
  - Result in damage to your reputation, FARFETCH and/or our business partners' reputations.
- DON'T — set up a social media account under the FARFETCH name unless authorized by the Social Team/Communications or Employer Brand teams;
- DO — Think before posting – if you're having second thoughts about whether your post is appropriate then it's best to not post anything.

In the event that you find derogatory or offensive posts about FARFETCH please contact the People team. If you are contacted by a journalist or the media about posts on social media, please contact [media@farfetch.com](mailto:media@farfetch.com).

For more information, please refer to our Social Media Policy.

### External Communications

FARFETCH receives lots of interest from media, event organisers and other audiences who want to know more about the company, our history, how we work and our future plans. In order to make sure we manage our reputation well, and do the best job of telling our story, everyone at FARFETCH needs to adhere to the following rules:

- DO — send all media inquiries you receive to [media@farfetch.com](mailto:media@farfetch.com) and DON'T answer them;
- DO — get a clearance from Communications Team before accepting an invitation to participate at any conference or event;
- DO — ask the Communications Team if you're ever in doubt of what you can/can't say externally;
- DO — remember if you're attending an event that you're representing FARFETCH, and be careful what you say in line with this Code and FARFETCH Publicity Guidelines;
- DON'T — share any FARFETCH facts, stats, and figures externally without checking first — email [media@farfetch.com](mailto:media@farfetch.com);
- DON'T — make future predictions about FARFETCH or provide anyone externally with information about upcoming launches, new business opportunities and future plans;
- DON'T — share any rumors about FARFETCH, always check with [media@farfetch.com](mailto:media@farfetch.com) first;

- DON'T - answer any inquiries from investors and research analysts – always refer them to [IR@farfetch.com](mailto:IR@farfetch.com).

For more information, please refer to our FARFETCH Publicity Guidelines.

## CONFLICTS OF INTEREST

A conflict of interest occurs when your private interests interfere, or even appear to interfere, with the interests of FARFETCH as a whole.

For example, a conflict of interest can arise when a Farfetcher takes actions or has personal interests that may make it difficult to perform his or her duties objectively and effectively. A conflict of interest may also arise when a Farfetcher, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position at FARFETCH.

Conflicts of interest can also occur indirectly. For instance, when a Farfetcher is also a director, a major shareholder or has a material interest in a company or organization doing business with FARFETCH.

Each Farfetcher has an obligation to conduct business in an honest and ethical manner, including handling conflicts of interest between personal and professional relationships. Any situation that may involve a conflict of interest with FARFETCH should be disclosed promptly to FARFETCH Ethics & Compliance team at [compliance@farfetch.com](mailto:compliance@farfetch.com).

Remember, situations constantly change. You may start off not having any conflict of interest, but then the opportunity, employment, relationship may develop into a conflict of interest. It is your duty to remain vigilant and disclose all such cases.

This Code doesn't attempt to describe all possible conflicts of interest that could develop, but here are some examples:

- Any conduct or activities that are inconsistent with FARFETCH's best interests or that disrupt our existing or potential business relationships;
- Accepting compensation, in any form, for services performed for FARFETCH from any source other than FARFETCH;
- Taking up any management or other employment position with, or having any material interest in, any firm or company that's in competition with FARFETCH; or
- Conducting business with anyone with whom you have personal relationships.

FARFETCH supports professional and personal growth, which may include taking other employment, volunteering, or serving for not-for-profit organizations. In these cases, you should take special care to avoid conflicts of interest: before taking employment with another company, notify your manager and get approval from FARFETCH Ethics & Compliance team.

You don't need approval when volunteering or serving for a not-for-profit organization unless it creates a conflict of interest with FARFETCH. In this case, notify your manager and get approval from FARFETCH Ethics & Compliance team.

When working for another company (provided that you have approval), you must follow these principles:

- Dedicate your skills and expertise to FARFETCH – your other employment, volunteering or other activities must not affect your FARFETCH work;
- Avoid spending your time at FARFETCH or using its assets for other jobs or activities; and,

- Avoid using your position at FARFETCH (including, for example, your influence or any confidential information) for other jobs or activities.

When in doubt if your other job or activity may create a conflict of interest, ask FARFETCH Ethics & Compliance team at [compliance@farfetch.com](mailto:compliance@farfetch.com).

## **HEALTH AND SAFETY**

We're committed to managing and operating FARFETCH in a manner that's protective of human health and safety, as well as the environment.

We shall provide and maintain safe and healthy working conditions, in particular ensuring, as far as reasonably practicable, that:

- Places of work are kept in a clean and safe condition, with arrangements in place for Farfetchers' welfare;
- Work equipment is provided and maintained in a safe condition, suitable for the task;
- Working practices are safe;
- All employees receive encouragement, information, and support to enable them to carry out their work with regard for their own and others' safety; and,
- Safety factors are given proper consideration when any changes are made to our operation.

We encourage you to be actively involved in maintaining the safest possible operating conditions and practices.

## **GIFTS AND FAVORS**

The purpose of business gifts and entertainment in a commercial setting is to create goodwill and sound working relationships, rather than to gain unfair advantage with partners. Therefore, you must act in a fair and impartial manner in all business dealings. Gifts and entertainment should further the business interests of FARFETCH, rather than potentially influencing business judgment or creating an obligation.

Gifts must not be lavish or in excess of the generally accepted business practices of one's country and industry. Gifts of cash or cash equivalents are never permitted, and requesting or soliciting personal gifts, favors, entertainment or services is unacceptable. You should contact the FARFETCH Ethics & Compliance team to discuss if you are not certain that a gift is appropriate.

It's strictly prohibited to make illegal payments to government officials of any country. This is important, because the promise, offer or delivery to an official or employee of any government of a gift, favour or other gratuity in violation of these rules would not only violate this Code but could also be a criminal offence.

We recognize that accepting gifts or hospitality from third parties could be appropriate in certain situations, but be cautious and declare any gifts or hospitality with a value more than £250 (or local currency equivalent) by emailing details of the gift, approximate value, who it was received from and why to [compliance@farfetch.com](mailto:compliance@farfetch.com).

See the section on Gifts & Hospitality in the Anti-Bribery and Anti-Corruption Policy for more information.

# THINK GLOBAL

FARFETCH is a global company that does business in different regions, jurisdictions, and cultures. In order to remain successful, we must always abide by our international obligations disregarding where our offices are located.

## ANTI-BRIBERY AND ANTI-CORRUPTION

At FARFETCH, we have a zero-tolerance approach to corruption. Globally, we are committed to complying with all applicable laws – these include the Foreign Corrupt Practices Act and the UK Bribery Act of 2010. It's part of our international obligation to combat bribery, corruption, and facilitation payments around the world, so we're subject to these laws even when working overseas.

Farfetchers located outside of the United States and/or United Kingdom must comply with laws, regulations, rules, and regulatory orders of the United States and/or United Kingdom in addition to applicable local laws.

Any concerns about bribery or corruption within FARFETCH, by employees or third-party business partners, will be treated confidentially. Appropriate disciplinary or legal action will be taken by FARFETCH if our Anti-Bribery and Anti-Corruption Policy is breached.

Remember that you're expected to follow these rules:

- You must read and comply with our detailed Anti-Bribery and Anti-Corruption Policy;
- Giving or receiving a bribe to influence a business outcome (directly or indirectly), regardless of local custom or practice, is prohibited and a criminal offence;
- Facilitation payments are prohibited. We recognise that on rare occasions, making payments for health and safety purposes may be unavoidable. In a case where you reasonably believe that there's an imminent threat to the health, safety, liberty or welfare of an employee, family member, or colleague, notify FARFETCH Ethics & Compliance team as soon as possible;
- Any dealing with a third-party business connection of FARFETCH that will result in a benefit or gain personally, or for a relative or friend, must be reported to FARFETCH Ethics & Compliance team before the dealing occurs.

You must notify FARFETCH Ethics & Compliance team as soon as possible if you believe or suspect any violation of these rules has taken place or is taking place at FARFETCH.

Refer to our Anti-Bribery and Anti-Corruption Policy for more information.

## TRADE CONTROLS

Trade controls, restrictions and sanctions are imposed by different countries from time to time. This means that laws might prohibit:

- Investments to certain countries and economic sectors;
- Dealing with certain companies and individuals;
- Buying or selling particular goods; or
- Traveling to or from certain countries.

If your work involves international transactions, you need to read and comply with our Trade Controls Policies. If you're in doubt as to whether a transaction falls under a trade control restriction, please contact FARFETCH Ethics & Compliance team.

Refer to our Trade Controls Policy for more information.

## **MONEY LAUNDERING, CRIMINAL PROPERTY AND TERRORIST FINANCING**

Money laundering is the process by which people attempt to disguise illegally gained proceeds to make the proceeds appear to come from legitimate sources or activities – or, conversely, when they finance illegal activities using funds routed through legitimate sources.

Farfetchers must comply with all anti-money laundering laws. In many countries, there are additional laws, designed to counter the financing of terrorism, that create specific obligations upon FARFETCH.

You should act to ensure that our assets and business are not used by any persons, whether they're directors, officers, employees, customers, suppliers, or contractors, in any way so as to launder money, deal with criminal property, or finance terrorism.

Here are some examples that might constitute money laundering:

- A partner asking to pay under the contract to a third party, who is not a party to this contract;
- A partner asking to pay under the contract to a different account, not located in a country of the partner's domicile;
- Payments being made in a currency other than the currency specified in the contract;
- A partner requesting to pay in cash; or
- A partner using multiple accounts for transactions under one contract.

If you encounter any of the above, or suspect the activity may be money laundering, immediately report this to your manager or FARFETCH Ethics & Compliance team.

## **POLITICAL CONTRIBUTIONS**

We don't make political contributions, including donations to any political party, candidate for political office or party official.

Farfetchers can participate in the political process as individuals in their own time, but you must make every effort to ensure that you don't create the impression that you speak or act on behalf of FARFETCH with respect to political matters. In addition, you can't receive any reimbursement from corporate funds for a personal political contribution.



# AMAZE CUSTOMERS

At FARFETCH, we have two main kinds of customers: our business partners and our end customers. We must not only understand their needs, but also consider the impact our actions may have on them.

Always keep in mind the following rules when doing business.

## FAIR DEALINGS

Farfetchers should deal fairly with everyone with whom they have FARFETCH business. This means that no Farfetcher should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

Also prohibited are inappropriate use of proprietary information, misusing trade secret information obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies.

## ANTI-TRUST LAWS AND COMPETITION

The purpose of anti-trust laws is to preserve fair and open competition and a free market economy: goals we fully support. Farfetchers must not directly or indirectly enter into any formal or informal agreement with a competitor that:

- Fixes or controls prices;
- Divides or allocates markets;
- Limits the production or sale of products;
- Boycotts certain suppliers or customers; or
- Eliminates competition or otherwise unreasonably restrains trade.

If you have any questions or concerns regarding anti-trust or competition laws and how they apply to your specific role or relationship, contact your regional FARFETCH Legal team.

## CONFIDENTIALITY

In carrying out FARFETCH's business, you might learn confidential or proprietary information. This includes all non-public information relating to FARFETCH, or other companies, that would be harmful to the relevant company or useful or helpful to competitors if disclosed. It might include:

- Financial results or prospects, or other information about FARFETCH's financial condition;
- Information provided by a third party;
- Information about FARFETCH customers or colleagues;
- Information about FARFETCH business partners, contracts concluded or in negotiation or any other information about the relationships with existing or prospective partners;
- Trade secrets;
- New product or marketing plans;
- Research and development ideas;
- Manufacturing processes;
- Application's source code (unless previously approved to be open source), tokens or credentials;
- Potential acquisitions or investments; or

- Information of use to our competitors or harmful to us or our customers if disclosed.

As a Farfetcher, you must maintain the confidentiality of all information entrusted to you, except when disclosure is authorised or legally required. You can't use such information for personal gain, and these confidentiality obligations continue even after employment with FARFETCH ends.

### ***How to protect confidential information***

Safeguard confidential information by keeping it secure, limiting access to those who have a need to know it in order to do their job, and avoiding discussion of confidential information in public areas such as planes, elevators, and restaurants. This prohibition includes, but is not limited to, inquiries made by the press, analysts, investors, or others.

All reasonable precautions should be taken to ensure that any confidential information isn't shared outside the business. This ranges from protecting FARFETCH's technology assets (laptops, desktops, mobile devices) and using appropriate passwords, through to protecting our premises in line with policies and ensuring you don't share confidential information.

If you're sharing FARFETCH information outside the business, put appropriate protections in place, including non-disclosure or confidentiality agreements and/or encrypting data. Contact FARFETCH Ethics & Compliance team for more information.

If you receive confidential information about another company, check with your manager first to see if FARFETCH has agreed to look after this information in a particular way, for example by only sharing it with a limited distribution list.

If you discover that FARFETCH information has been leaked or believe a colleague may be sharing FARFETCH information outside the business, please contact FARFETCH Ethics & Compliance team at [compliance@farfetch.com](mailto:compliance@farfetch.com) immediately.

# TODOS JUNTOS

Apart from personal conduct, team work also determines how successful our company becomes. The following rules presume collective efforts of all Farfetchers: even a single breach may put the whole company at risk.

## **PRIVACY AND PROTECTING PERSONAL DATA**

We care about privacy because it's ethical, and it's also key to protecting our reputation and minimizing legal risk.

We all have a responsibility to ensure information about people, from other Farfetchers to customers and contacts, is collected and used responsibly, and is not shared beyond FARFETCH.

Personal data is any information that can be linked to a person, or a unique identifier such as images, performance related data, customer account information, financial details, purchase history, preferences, and behaviors.

Part of responsible data collection and use means being transparent about what's being collected and why. We should only use personal data in line with expectations and for specific business reasons, and all reasonable precautions should be taken to keep it secure and confidential.

Consult with the FARFETCH Data Protection Officer (FARFETCH DPO) ([privacy@farfetch.com](mailto:privacy@farfetch.com)) before sharing personal data outside the business, as appropriate protections must be put in place, including signing non-disclosure agreements or encryption.

You should also contact FARFETCH DPO if you're working on projects that change the way we collect or use data about our customers. This might include gathering new types of data or using data in new ways, for example to analyze customer preferences or behaviors.

Be aware that people have certain rights over their personal data. If you receive a request regarding personal data, contact the FARFETCH DPO. You should also contact DPO – as well as FARFETCH Ethics & Compliance team – if you discover that personal data has been accessed without authority, leaked, or believe a colleague may be sharing it outside FARFETCH.

More information on your obligations towards privacy and personal data protection can be found in the FARFETCH Group Data Protection Policy.

## **CYBERSECURITY**

As an e-commerce company, FARFETCH pays special attention to cybersecurity. We encourage you to be extremely cautious with passwords and access to the FARFETCH network and systems. Current data protection laws and regulations impose massive obligations in companies worldwide, which means that if we fail to comply it could have severe consequences, including large penalties.

As a result, note that you must not use or distribute any software that wasn't provided to you by FARFETCH. It is also prohibited to use, copy, distribute or alter FARFETCH software without respective authorization.

For added protection, we have the right to review and monitor all data on our network or any computers, laptops, smartphones, and other electronic devices. We can also conduct video surveillance and workplace searches on FARFETCH premises.

For more information, please refer to the Information Security Global Policies.

## **PROTECTION AND PROPER USE OF COMPANY ASSETS**

All Farfetchers should protect FARFETCH's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. All FARFETCH assets should be used only for legitimate business purposes.

The obligation of Farfetchers to protect FARFETCH's assets consist of its proprietary information, which includes:

- Intellectual property, such as trade secrets, trademarks, inventions, patents, copyrights and software;
- The FARFETCH name or logo (check our Brand Guidelines or ask FARFETCH Ethics & Compliance team);
- Business, marketing, and service plans;
- Engineering and manufacturing ideas;
- Designs, databases, records & salary information; or
- Any unpublished financial data and reports.

Our technology assets store valuable business information and should remain safe and secure to protect our reputation and minimize legal risk.

We all have a responsibility to ensure FARFETCH information and assets are protected from interference, misuse, or loss and as such are expected to exercise honest and sensible judgement at all times.

All Farfetchers should take due care of FARFETCH computers and other devices when using them both inside and outside of FARFETCH premises. Lock them away securely when not in use and exercise all reasonable precautions to ensure laptops and other devices are not left unsecured overnight, in unoccupied vehicles or unsecured in hotel rooms and to ensure they're not physically damaged, lost or stolen.

If any technology asset is lost or stolen, report it immediately to your local IT contact who'll advise you of the local procedure to follow. If you've lost or damaged any technology asset on more than one occasion, you might be charged to replace it. All technology assets provided by FARFETCH are company property and must be returned to the business if requested.

## **ACCURACY OF BUSINESS RECORDS**

All financial books, records and accounts must accurately reflect our transactions and events. They must also conform to International Financial Reporting Standards (IFRS) and to our own system of internal controls.

No entry can be made that intentionally hides or disguises the true nature of any transaction. You should therefore attempt to be as clear, concise, truthful, and accurate as possible when recording any information.

# BE REVOLUTIONARY

## CHARITABLE DONATIONS

In certain circumstances, we might make charitable donations. It's important to note that no charitable donation of corporate funds can be made in return for favorable treatment – all corporate charitable donations must be approved by FARFETCH Ethics & Compliance and follow this policy, as well as applicable laws. They also need to be approved by the Communications team (Susannah Clark, VP Communications) who will ensure the charity has not faced any reputational issues and is broadly aligned to company ESG strategy. It'll also have to be accounted for properly in accordance with our financial procedures.

Personal charitable donations made by Farfetchers as private citizens, outside of their role at FARFETCH and consisting of personal resources, don't need to be reviewed or approved in the same way. Be aware that they should not be made using FARFETCH's name, letterhead, stationary or funds, and should never be made in return for favorable treatment for FARFETCH.

## HUMAN RIGHTS

We are committed to upholding universal human rights. We prohibit the following practices and will not knowingly do business with any individual or company (including all vendors and suppliers - see Vendor Code of Conduct for additional information) that participates in the following practices:

- Exploitation of children, including child labour;
- Physical punishment and all forms of human abuse;
- Forced or compulsory labour;
- Unlawful discrimination in employment and occupation.

If you believe or suspect any violation of these rules has taken place or is taking place at FARFETCH please notify FARFETCH Ethics & Compliance team as soon as possible.

# BE BRILLIANT

The bigger FARFETCH grows the more it becomes exposed to new risks and the more common risks become. Therefore, all Farfetchers must strive for excellence not only with their direct duties but also with the following rules.

## COMPLIANCE WITH LAWS, RULES AND REGULATIONS

You are obligated to comply with all applicable laws, rules, and regulations: it's your personal responsibility to follow the standards and restrictions imposed by these laws, rules, and regulations in performing your FARFETCH duties. FARFETCH conducts business honestly, transparently and in full compliance with all applicable laws, rules, and regulations, including participation in any government investigations or inquiries. Any official government request must be immediately referred to the FARFETCH Ethics & Compliance team.

FARFETCH executive teams are also required to promote compliance by all Farfetchers with this Code and to abide by FARFETCH standards, policies, and procedures.

As a global company, FARFETCH might from time to time face different complex regulations, including international trade sanctions. You are expected to be familiar and comply with our Trade Controls Policy.

## INSIDER TRADING

Trading on inside information is a violation of law. Farfetchers in possession of material non-public information about FARFETCH or companies with whom we do business must abstain from trading or advising others to trade in the respective company's shares from the time that they obtain such inside information until adequate public disclosure of the information.

Material information is information of such importance that it can affect the judgment of investors as to whether or not to buy, sell, or hold the securities in question. To use non-public information for personal financial benefit or as a tip to others, including family members, who might make an investment decision based on this information is not only unethical but also illegal.

Farfetchers who trade shares based on insider information can be personally liable for damages totaling up to three times the profit made, or loss avoided by the respective Farfetcher. For more information on insider trading regulations please refer to our Insider Trading Policy or FARFETCH Ethics & Compliance team at [compliance@farfetch.com](mailto:compliance@farfetch.com).

## PERSONAL INVESTMENTS

Farfetchers may not own, either directly or indirectly, a substantial interest in any business entity that does, seeks to do business with, or is in competition with FARFETCH, without providing advance notice to FARFETCH Ethics & Compliance team.

However, investments in publicly traded securities of companies not amounting to more than three percent (3%) of that company's total outstanding shares are permitted without advance approval.

## **CORPORATE OPPORTUNITIES**

All Farfetchers owe a duty to FARFETCH to advance the legitimate interests of our company as a whole if the opportunity arises. Farfetchers are prohibited from directly or indirectly:

- Taking personally for themselves opportunities that are discovered using FARFETCH property, information, or positions;
- Using FARFETCH property, information, or positions for personal gain; or
- Competing with FARFETCH for business opportunities.

If FARFETCH's disinterested directors of the Board determine that we won't pursue an opportunity that relates to the FARFETCH business, a Farfetcher can do so. Ensure you notify the disinterested directors of the Board of intended actions in order to avoid any appearance of conflict of interest. Any questions, contact FARFETCH Ethics & Compliance team.

## **WAIVERS**

Before a Farfetcher, or an immediate family member of any Farfetcher, engages in any activity that would be otherwise prohibited by the Code, he or she is strongly encouraged to obtain a written waiver from the Board. Please contact the Ethics & Compliance team at [compliance@farfetch.com](mailto:compliance@farfetch.com).

The same goes for a director or executive officer, or an immediate family member of a director or executive officer, who must obtain a written waiver from the disinterested directors of the Board. Such a waiver must then be disclosed to FARFETCH's shareholders, along with the reasons for granting the waiver.

## **NO RIGHTS CREATED**

This Code is a statement of certain fundamental principles to govern our conduct as Farfetchers and of FARFETCH business. It's not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity.

## Appendix A – Links to other policies

1. [Global Speak Up Policy](#)
2. [Social Media Policy](#)
3. [FARFETCH Publicity Guidelines](#)
4. [Anti-Bribery and Anti-Corruption Policy](#)
5. [Trade Controls Policy](#)
6. [FARFETCH Group Data Protection Policy](#)
7. [Information Security Global Policies](#)
8. [Insider Trading Policy](#)



## **Appendix B – Speaking-Up Hotlines**

1. Brazil: 2120180300
2. China: 400-120-1893
3. United Kingdom: 0808 196 5858
4. Hong Kong: 800902055
5. India: 022 5097 2690
6. Italy: 800 819 586
7. Japan: 0800-080-7507
8. Portugal: 800815079
9. United Arab Emirates: 800 0120324
10. United States: 1-844-233-7105

**MONITORING AND REVIEW**

This policy will be reviewed and amended from time to time due to changes to legal requirements, business needs and other reasons that may arise.

**REVISION HISTORY**

<b>Date</b>	<b>Responsible</b>	<b>Summary of Changes</b>
3/10/2018	Ethics & Compliance	Creation of the policy.
6/28/2021	Ethics & Compliance	Update to policy.
2/9/2023	Ethics & Compliance	Reviewed policy.
11/24/2023	Ethics & Compliance	Update to policy.
27/06/2024	Ethics & Compliance	Update of the following: <ul style="list-style-type: none"><li>- Speak Up link to Navex (change of provider)</li><li>- Policy links</li><li>- Speak Up hotline numbers</li><li>- Privacy notice</li></ul>