



CONFLICT MINERALS POLICY

(Amended and Restated as of January 1, 2019)

Capri Holdings Limited and its consolidated subsidiaries (collectively, “Capri,” “we,” “us” and “our”) are committed to ensuring full compliance with the U.S. Conflict Minerals Rule as it relates to the use of “conflict minerals” in products manufactured by us or on our behalf (the “Conflict Minerals Rule”).

The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the eastern Democratic Republic of the Congo (the “DRC”) and is focused on specific minerals sourced from the DRC and its adjoining countries (Angola; Burundi; Central African Republic; the Republic of the Congo; Rwanda; South Sudan; Tanzania; Uganda; and Zambia). As a publicly-traded company, we are required to make certain disclosures annually to the U.S. Securities and Exchange Commission (the “SEC”) concerning the defined conflict minerals – cassiterite (tin), columbite-tantalite (tantalum), gold and wolframite (tungsten) – that are necessary to the functionality or production of products that Capri manufactures or contracts to manufacture and whether those conflict minerals support armed groups in the DRC or other covered countries.

Capri takes its obligations under SEC regulations and the laws in countries in which we operate seriously. We are committed to principles of ethical business practice and recognition of the dignity of others, including the responsible sourcing of conflict minerals, and we expect that our suppliers share this commitment. We have adopted this policy as part of our efforts to encourage our suppliers to respect human rights and source product in a socially and environmentally responsible manner.

To this end, we instituted an assessment of our supply chain to identify areas where there may be conflict mineral use and we work closely with our suppliers to determine the use and origin of conflict minerals in our supply chain. In furtherance of this, we follow the processes and procedures set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”).

Capri does not directly source conflict minerals from mines, smelters or refiners, and is many levels removed from these market participants. We therefore require the cooperation of our suppliers in the implementation of this policy and in enabling Capri to meet its SEC compliance obligations. In furtherance of this policy, suppliers are expected to:

- Put in place procedures for the traceability of conflict minerals;
- Cooperate with our conflict minerals due diligence process, which includes providing us, from time to time, with written certifications and other information concerning the origin of conflict minerals included in products and/or components supplied to Capri;
- Maintain reviewable business records supporting the source of conflict minerals;
- Adopt policies and procedures with respect to conflict minerals consistent with Capri’s policy and practices set forth herein and the OECD Guidance, including the adoption of a risk mitigation strategy to respond to identified risks in the supply chain, and communicate such policies and procedures to their personnel, direct suppliers and indirect suppliers; and

- Require their direct and indirect suppliers to adopt policies and procedures that are consistent with our Conflict Minerals Policy.

Suppliers are encouraged to contact the production teams with whom they regularly conduct business if they have questions concerning this policy. In addition, concerns regarding this policy, or violations, can be reported as follows:

By email via: conflictmineralscompliance@capriholdings.com

By mail to the following address:

33 Kingsway
London, United Kingdom
WC2B 6UF
Attention: Corporate Secretary