



Non-Facilitation of Tax Evasion Policy **(as of July 10, 2023)**

Capri Holdings Limited (the "**Company**") is committed to conducting business honestly, professionally and with integrity. As such, the Company takes a zero-tolerance approach to tax evasion or the facilitation of tax evasion, whether under US law, UK law or under the law of any foreign country. The Company will uphold all applicable laws relevant to countering tax evasion, including the UK Criminal Finances Act 2017.

The purpose of this Policy is to set out the Company's expectations regarding the Company's and each of its subsidiaries' staff and third parties acting for or on behalf of the Company or any of its subsidiaries, and to provide guidance on how to recognise and avoid helping others evade tax. Breach of laws relevant to countering tax evasion can lead to criminal liability, including the prosecution of individuals, imprisonment and fines.

This Policy is only intended to familiarise you with the Company's expectations and some of the legal issues relevant to compliance with applicable laws relevant to countering tax evasion, including the UK Criminal Finances Act. Questions concerning specific transactions, scenarios or payments should be directed to the Company's General Counsel.

I. ROLES AND RESPONSIBILITIES

This Policy applies to all directors, officers, employees, secondees and agency staff (whether temporary, contract or permanent) (the "**Employees**") of the Company or of any subsidiary thereof.

It is the Company's expectation that anyone doing business or performing services for or on behalf of the Company or any of its subsidiaries in any capacity (including, but not limited to, agents, consultants, contractors, sub-contractors, representatives, advisors, suppliers, distributors) wherever located (collectively referred to as "**Third Parties**"), will conduct themselves in accordance with laws relevant to countering tax evasion and the principles of this Policy. Behaviour which breaches or runs counter to the principles in this Policy may lead to prosecution, severe penalties and termination of contracts and relationship with the Company and/or any of its subsidiaries.

Each Employee is held accountable for full compliance with this Policy. Non-compliance will result in termination, disciplinary or other actions against Employees as appropriate in accordance with relevant laws and/or the Company's internal policies and regulations.

When necessary, specialized training will be provided to Employees with significant compliance responsibilities or in high risk functions. Notwithstanding such training, it is the responsibility of each Employee to review and ensure they understand the principles of this Policy.

II. SUMMARY OF LEGAL PROVISIONS

A. What is Tax Evasion?

Tax Evasion means deliberately or dishonestly cheating the public revenue or fraudulently evading tax (whether US tax, UK tax or tax in a foreign country).

B. What is Facilitation of Tax Evasion?

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether US tax, UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that evasion.

III. PROCEDURES AND PROCESSES

A. Prohibited Activities

No Employee or Third Party when acting for or on behalf of the Company or any subsidiary thereof may either evade tax, facilitate tax evasion by another person (including by any other entity), or provide assistance to anyone who they know or suspect is engaged in tax evasion. This principle applies regardless of what the tax is, extending to all direct and indirect taxes, including VAT and duties, and employment taxes. It also applies irrespective of the location of the Employee or Third Party or the other person and notwithstanding that the person may not actually succeed in evading tax.

B. Reporting Suspicions and Red Flags

Employees and Third Parties should be alert to any signs (or "red flags") that third parties are looking to or are actually evading tax in their dealings with the Company or with any of its subsidiaries. If you have cause to suspect this, or encounter any of these red flags, you must report them promptly using the process described in Section IV (How Do I Report Violations?).

The below is a list of example red flags that may arise during the course of you working for or with the Company or any of its subsidiaries. The list is not intended to be exhaustive:

- (a) you become aware, in the course of your work, that a Third Party has made or intends to make a false statement relating to tax, has failed to disclose income, or has failed to register with a relevant tax authority;
- (b) a Third Party requests payment in cash, refuses to sign a formal agreement, or fails to provide an invoice or receipt for a payment made;
- (c) a Third Party requests that payment be made to a country, jurisdiction or geography location that is different from where the Third Party is understood to reside or conduct business, or to a jurisdiction which does not impose tax or could be regarded as a tax haven;
- (d) a Third Party insists on the use of side letters, refuses to put terms agreed in writing, or asks for contracts or other documentation to be backdated;

- (e) you notice that we have been invoiced for a commission or fee payment that appears too large or too small, given the service stated to have been provided; or
- (f) a Third Party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.

C. Due Diligence

No Third Party should be engaged to act on behalf of the Company or any of its subsidiaries without proportionate and risk-based due diligence having been carried out on the Third Party in advance.

This Policy and the Company's zero-tolerance approach to tax evasion must be communicated to all Third Parties at the outset of the business relationship and as appropriate after that.

D. Refusal to do Business and Record Keeping

We must decline to do business with Third Parties that the Company suspects of being engaged in tax evasion or facilitation of tax evasion, even where that could represent a substantial benefit for the Company or for any of its subsidiaries.

Where we decline such business, a written record must be made of the reasons for that decision.

IV. HOW DO I REPORT VIOLATIONS?

Any violation or suspected violation of this Policy or of any laws relevant to countering tax evasion, or any concerns about any incidents or behaviour that may run counter to the principles of this Policy should be reported without delay to the Company's General Counsel.

Alternatively, the violation or suspected violation may be reported:

- (g) Using the Company's confidential hotline, by calling the number set forth below on Annex A; or
- (h) To the Company's Internal Audit Department (who will promptly notify the Company's General Counsel).

The Company is committed to ensuring that there is no retaliation against Employees who speak up in good faith, and prohibits any retaliation, discrimination or harassment against any person who reports a concern or who otherwise assists in any investigations of a concern.

V. ADDITIONAL RESOURCES

Questions by Employees or other persons acting on behalf of the Company or any of its subsidiaries concerning application of this Policy or our business practices and policies should be directed to the Company's General Counsel.

ANNEX A

COUNTRY-SPECIFIC ETHICS HOTLINE NUMBERS			
No.	Country	STEP ONE	STEP TWO
		From an outside line dial the direct access number for your location:	At the English prompt dial this Toll-Free Number
1	Austria	0-800-200-288	855-224-4261
2	Belgium	0-800-100-10	855-224-4261
3	Canada	1-855-224-4261	N/A
4	China	4006000291	N/A
5	Czech Republic	00-800-222-55288	855-224-4261
6	Denmark	800-100-10	855-224-4261
7	Finland	0-800-11-0015	855-224-4261
8	France (Telecom)	0-800-99-0011	855-224-4261
	France (Paris Only)	0-800-99-0111	855-224-4261
	France	0-800-99-1011	855-224-4261
	France (Telecom Development)	0805-701-288	855-224-4261
9	Germany	0-800-225-5288	855-224-4261
10	Hong Kong	800-96-1810	N/A
11	Hungary	06-800-011-11	855-224-4261
12	Ireland (UIFN)	00-800-222-55288	855-224-4261
	Ireland	1-800-550-000	855-224-4261
13	Italy	800-172-444	855-224-4261
14	Japan (NTT)	0034-811-001	855-224-4261
	Japan (KDDI)	00-539-111	855-224-4261
	Japan (Softbank Telecom)	00-663-5111	855-224-4261

No.	Country	STEP ONE	STEP TWO
		From an outside line dial the direct access number for your location:	At the English prompt dial this Toll-Free Number
15	Korea (Dacom)	00-309-11	855-224-4261
	Korea (ONSE)	00-369-11	855-224-4261
	Korea (Korea Telecom)	00-729-11	855-224-4261
	Korea (US Military Bases – Dacom)	550-2872	855-224-4261
	Korea (US Military Bases – Korea Telecom)	550-4663	855-224-4261
16	Latvia	8000-2288	855-224-4261
17	Luxembourg	800-201-11	855-224-4261
18	Lithuania	TBA	TBA
19	Malaysia	1-800-80-0011	855-224-4261
20	Netherlands	0800-022-9111	855-224-4261
21	Norway	800-190-11	855-224-4261
	Norway (US Military Bases)	800-199-11	855-224-4261
22	Poland	0-0-800-111-1111	855-224-4261.
23	Portugal	800-800-128	855-224-4261
24	Romania	0808-03-4288	855-224-4261
25	Russia (St. Petersburg)	363-2400	855-224-4261
	Russia (Moscow)	363-2400	855-224-4261
	Russia	8^10-800-110-1011 ^ Indicates second dial tone	855-224-4261
	Russia (Outside Moscow)	8^495-363-2400 ^ Indicates second dial tone	855-224-4261
	Russia (Outside St. Petersburg)	8^812-363-2400 ^ Indicates second dial tone	855-224-4261
26	Spain	900-99-0011	855-224-4261
27	Sweden	020-799-111	855-224-4261
28	Switzerland	0-800-890011	855-224-4261
29	Taiwan	00-801-102-880	855-224-4261
30	United Arab Emirates	8000-021	855-224-4261
	United Arab Emirates (du)	8000-555-66	855-224-4261
	United Arab Emirates (Military-USO and cellular)	8000-061	855-224-4261
31	United Kingdom & Northern Ireland (C&W)	0-500-89-0011	855-224-4261
	United Kingdom & Northern Ireland (British Telecom)	0-800-89-0011	855-224-4261
32	United States of America	855-224-4261	N/A