

# FARFETCH

## CODE OF BUSINESS CONDUCT & ETHICS







## INTRODUCTION

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Farfetch is a global marketplace for the luxury fashion industry, operating in multiple countries and jurisdictions. This comes with important responsibilities for us, and it is critical that we follow the highest standards of business ethics, including doing business honestly and transparently, in full compliance with applicable global legislation.

Accordingly, The Code of Business Conduct and Ethics (the “Code”) provides and promotes these principles and standards, serving as a day-to-day guide for making honest and ethical decisions at work.

It applies to all Farfetch Employees (whether full-time or part-time and including employees at all group companies), contractors, third parties, consultants, or freelancers (together, “Covered Persons” or for the purposes of this Code, “Farfetchers”).

Complying with the law and these principles and standards is not only a legal requirement; it is an ethical obligation for everyone at Farfetch. This commitment applies to our relationships with each other and with our customers, suppliers, partners and other third parties.

This Code is not a substitute for your good judgement. It does not cover every conceivable situation, legal or ethical question that you may face. You should be alert to signs that you or your colleagues are in an ethics grey area. Ask yourself if your actions comply with the law and company policies if you have any doubts about what you should do and ask for help if you are not sure.

# **FOLLOWING THIS CODE**

This Code of Conduct sets out Farfetch's commitment to ethical, legal, and integrity-driven behaviour worldwide and provides a common framework to guide all Farfetchers in their day-to-day decisions.

By following this Code, we demonstrate integrity and transparency, protect our reputation, and ensure compliance with all applicable laws and Farfetch's core principles. This Code applies globally to everyone acting on behalf of Farfetch. If an applicable local law imposes more stringent requirements than this Code, the local law prevails for Employees and Third Parties working in that country.

## **EMPLOYEES AND BOARD MEMBERS**

All officers and employees at all levels of the organisation worldwide and all members of the board of directors must comply with this Code at all times.

## **THIRD PARTIES**

Third parties include sellers, brands, boutiques, vendors, and other third parties supporting Farfetch's business and operations. Farfetch expects all third parties to act ethically and in a manner that is consistent with this Code and relevant parts of Farfetch's policies.

## **EMPLOYEES WORKING WITH THIRD PARTIES**

Take reasonable steps to provide third parties with a copy of this Code, and information about Farfetch's policies to assist these third parties to comply with the relevant parts of them. Take appropriate action, up to and including terminating a relationship, if you become aware that a third party has failed to comply with this Code or the relevant parts of Farfetch's policies.



# SPEAK UP

Our Speak Up culture empowers all Farfetchers to hold each other accountable as we promote ethical behavior in our daily work. We must all strive to maintain a working environment that encourages employees and Third Parties to speak up if something does not look or feel right. When we report ethics concerns, we make Farfetch stronger, and we protect our colleagues from harm. Speaking up also helps Farfetch address issues early before more serious consequences develop.

**It is the responsibility of each one of us to comply with Farfetch's policies and promptly take appropriate action (including filing a speak up report) as soon as non-compliance or ethical conduct concerns arise that may be damaging for the company's interests, operations and reputation.**

Discuss your concern with your manager, anyone in your management chain, the People team or the [Ethics & Compliance team](#).

## HOW TO REPORT AN ETHICS CONCERN

Farfetch has dedicated 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.

Seen, Heard or Read Something Wrong?  
Do the Right Thing.

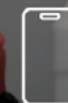
# SPEAK UP

Don't stay silent.

Report any knowledge/suspicion of breach of Farfetch policies, including fraud, theft, financial misconduct, bribery or corruption, harassment or discrimination.



Visit the Online Portal and  
select "Report Online"



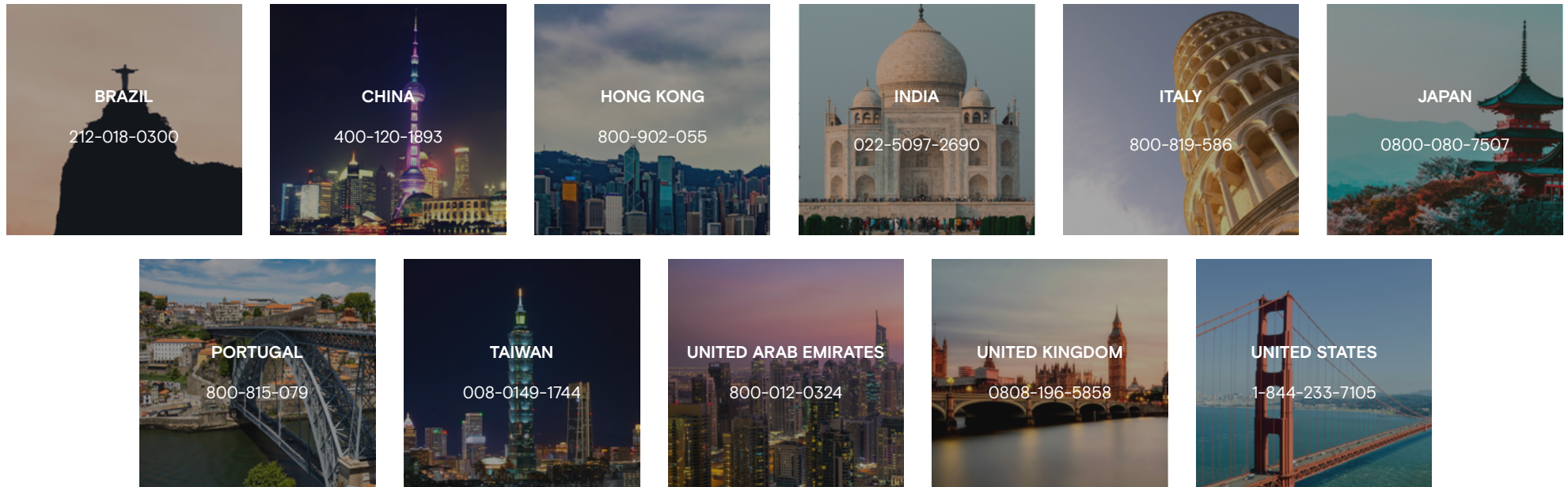
Call the Farfetch  
Ethics Hotline



Send an email to  
[speakup@farfetch.com](mailto:speakup@farfetch.com)



## SPEAK-UP HOTLINE NUMBERS



If reporting by phone is not currently available for the location you have selected, please use the online reporting option to submit your concern.

Farfetch prohibits any form of retaliation against anyone who reports with a reasonable belief about a suspected or known concern, or who participates in investigations.

If you believe you've experienced retaliation for reporting any situation, please inform your manager, the Ethics & Compliance team, or use one of our Speak Up channels. Retaliation is taken seriously and is subject to disciplinary action, including termination of employment.

You do not need to be certain that a violation has occurred.

Ethics concerns should be reported where you have a reasonable belief that wrongdoing has occurred or may occur. You must make a genuine attempt to provide honest and accurate information, even if you are later proven to have been mistaken.

No matter what Speak Up Channel you use, Farfetch strives to maintain confidentiality at all stages of the process, to the extent possible, and as 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.

## HOW WE HANDLE ETHICS CONCERNS

Farfetch examines all ethics concerns, and managers are required to escalate employees' ethics concerns through the appropriate channels.

Confidentiality is respected, and you can choose to remain anonymous when you report an ethics concern (however, if you identify yourself, we can follow up with you about your report). Your identity and information will only be shared on a "need-to-know" basis.

During the investigation process, Farfetch forms an objective investigation team, determines the facts through interviews and/or the review of materials, recommends appropriate disciplinary and corrective action if necessary, and provides the person who reported the ethics concern (if that person is known) with feedback on the status of the investigation. Where required by law or where it is appropriate to do so, Farfetch may share if disciplinary and corrective action has been taken (to the extent permitted by law).

Depending on the nature of the ethics concern, and where permitted or required under the applicable law, alternative conflict resolution approaches may be suggested or recommended instead of an investigation.





# COMPLIANCE WITH LAWS & REGULATIONS

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Farfetch's global operations mean that we must adhere to a wide, constantly evolving and increasing set of laws and regulations. This legal landscape can be complex with the laws of one country applying to our activities in another, and different requirements can sometimes conflict. If you have any questions about the application or interpretation of any law, rule, or regulation, it is your responsibility to contact the Legal and Compliance teams for guidance.

## FARFETCH IS COMMITTED TO

- Conducting business in an ethical, transparent, and professional manner, and in compliance with laws, regulations, and our policies.
- Incorporating legal and regulatory requirements into our business strategy and processes and ensuring we remain compliant with applicable rules and regulations in the locations where we operate.
- Developing strong processes to anticipate risks and adapting to new and changing legal and regulatory requirements.
- Providing Farfetchers with access to the subject matter expertise needed to manage legal and regulatory risks.

## FARFETCHERS MUST

- Actively participate in and complete all assigned Legal/ Compliance training. Additionally, ensure you are familiar with, and have acknowledged, all company policies and procedures applicable to your role.
- Be aware and comply with the laws and regulations that apply to our work responsibilities at all times.
- Treat regulators professionally, with courtesy, honesty, and respect always.
- Coordinate with business experts and with the Legal or Compliance teams when working with or responding to requests from government agencies or regulators.
- Speak up and promptly escalate any potential issues that may lead to a legal or compliance violation.

# ANTI-BRIBERY AND ANTI-CORRUPTION

Farfetch has zero tolerance for bribery or corrupt practices. We must comply with all anti-corruption laws worldwide, including the UK Bribery Act 2010, the US Foreign Corrupt Practices Act, and any applicable local statutes. Global compliance is mandatory, even when operating outside the UK or US.

## FARFETCH IS COMMITTED TO

- Prohibiting bribery and corruption in all business dealings, in every country where we operate or do business, with both governments and the private sector.
- Restricting, giving or receiving anything of value (such as bribes, kickbacks, or illegal payments) to or from anyone (including corporate entities) to influence the recipient to obtain or retain business or to secure any other improper business advantage.
- Prohibiting even small facilitation payments to expedite routine administrative actions, except where an employee's safety or security is at risk.
- Maintaining strong controls aimed at preventing and detecting bribery and corruption. This includes processes for engaging and monitoring third parties acting on Farfetch's behalf in business dealings. Farfetch prohibits anyone acting on its behalf, whether directly or indirectly, from making or receiving bribes or improper payments.
- Maintaining accurate books, records, and accounts that correctly reflect the true nature of all transactions.

## FARFETCHERS MUST

- Immediately report any actual or suspected violations or any requests for a bribe through the Speak Up Channels or to the Ethics & Compliance team.
- Never offer, promise, make, or authorise a payment or the giving of Anything of Value themselves or through any other party to anyone in order to obtain an improper business advantage. All business courtesies or gifts must be modest, infrequent, and aimed at genuine relationship-building.
- Refer to the Anti-Bribery and Anti-Corruption Policy and Procedures prior to providing Gifts or Entertainment to Public Officials. Providing Gifts and Entertainment to Public Officials is often prohibited / restricted.
- Follow due diligence processes and require that any Third Party representing Farfetch be carefully selected and monitored.
- Never contribute company funds or other company property or assets for political purposes. In certain circumstances, we might make charitable donations of corporate funds for legitimate charitable purposes but never in return for a favourable treatment.



# COMPETITION AND ANTITRUST

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Farfetch is committed to fair and ethical competition in all of its business dealings. The purpose of antitrust laws and requirements is to promote and preserve fair and open competition and a free market economy: goals we fully support. Each of us has a responsibility to understand and comply with antitrust rules and principles, as fair competition and integrity in our business dealings is fundamental to our reputation and continued success.

## FARFETCH IS COMMITTED TO

- Complying with all applicable antitrust and fair dealing laws and regulations globally.
- Operating our business ethically and with integrity, be it with our customers, partners or competitors; and never conducting or participating in deceptive, dishonest, or fraudulent activities. We do not take unfair advantage or engage in unfair business practices by misrepresenting or concealing facts, disparaging competitors, or abusing a superior bargaining position. Misusing a third party's (e.g. a business partner's) confidential information or trade secrets, or exchanging competitively sensitive information with competitors is expressly forbidden.
- Never participating in any activity that is intended to distort or restrain trade or divide or allocate customers, partners or markets more generally, in any country where such conduct would be in violation of the applicable law.

## FARFETCHERS MUST

- Never engage in anti-competitive behaviours which would unfairly restrict competition, including collusion or concerted practices. Never enter into any formal or informal, written or oral, agreement (directly or indirectly) with a competitor that fixes or controls prices, divides or allocates markets, limits the sale of products, boycotts certain suppliers or customers, or eliminates competition or otherwise unfairly restrains trade.
- Treat all Farfetch stakeholders, customers, business partners and suppliers fairly. This means that no Farfetcher should take unfair advantage of anyone through deception, concealment, misuse of confidential information, misrepresentation of material facts or any unfair dealing practice.
- Never engage in the misuse of a third party's (e.g. a business partner's) confidential information or trade secrets, and the exchange of competitively sensitive information with competitors. Farfetchers must not interfere with the relationships or transactions that our business partners and customers have with our competitors. Farfetchers must never demand or accept confidential information about these relationships, including trading terms, from business partners or any third parties. If you accidentally receive competitively sensitive information about a competitor, immediately notify the Farfetch Ethics and Compliance team or the Legal team.

# PROTECTION AND USE OF COMPANY ASSETS

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Farfetch is committed to protecting the organisation, its shareholders, employees, customers, suppliers, and other stakeholders, through effective management of risk of fraud, theft and misuse of company assets.

## FARFETCH IS COMMITTED TO

- Safeguarding Farfetch's assets and protecting the organization, shareholders, employees, customers, partners, and suppliers from fraud, theft, and misuse. Promoting integrity and transparency and prohibiting fraud, theft, and intentional misconduct of any kind in our business. This includes the theft or abuse of company funds, property, and assets of any kind for any purpose.
- Complying with all legal obligations, including the UK Economic Crime and Corporate Transparency Act 2023, by prohibiting and preventing any fraudulent or deceptive activity by anyone acting for or on behalf of Farfetch.
- Maintaining effective internal controls, conducting regular fraud risk assessments, and carrying out periodic audits to safeguard resources and prevent fraud against the company and external stakeholders.
- Fostering a culture of honesty, accountability, and transparency, supported by Farfetch's Anti-Fraud Policy as the framework for compliance and sustainable fraud prevention.

## FARFETCHERS MUST

- Act with honesty, integrity, and professionalism. Never engage in fraud, theft, forgery, or intentional dishonesty against Farfetch, its employees, customers, partners or any other internal/external stakeholders.
- Safeguard company funds, property, and technology resources including cash, credit cards, equipment, intellectual property, and information systems and use them only for legitimate business purposes.
- Promptly report any suspected fraud, theft, or misuse of assets through the Speak Up channels. Understand that anyone committing, concealing, or enabling fraud will face disciplinary action, up to and including termination.
- When working with third parties, take reasonable steps to ensure they understand Farfetch's commitment to fraud prevention. Report immediately if you suspect fraud is being committed for Farfetch's benefit, in line with the Failure to Prevent Fraud provisions under UK law.

For detailed guidance, including specific types of fraud, and our prevention procedures, please refer to the Global Anti-Fraud Policy available on My Farfetch.



# CONFLICTS OF INTEREST

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Avoiding conflicts of interest is at the core of building trust and positive relationships with our customers, business partners and other stakeholders, and all employees are responsible for making impartial, objective business decisions that are in the best interests of Farfetch and its stakeholders.

## FARFETCH IS COMMITTED TO

- Fulfilling our responsibility to all our stakeholders to make decisions based on Farfetch's interests, without regard to personal gain.
- Maintaining a Conflicts of Interest Policy which defines conflicts and provides guidance to employees to avoid them in relation to Farfetch and companies with which Farfetch has business relationships.
- Providing clear and direct channels such as the People team and the Ethics & Compliance team for promptly disclosing potential conflicts. Early disclosure enables Farfetch to assess and manage risks before they affect the business.
- Reviewing all reported conflicts of interest carefully, making decisions based on the specific circumstances to ensure they don't harm Farfetch or our stakeholders.

## FARFETCHERS MUST

- Be alert to situations where personal interests might conflict with Farfetch's interests. Nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of Farfetch.
- Immediately inform your manager and Ethics & Compliance team of any actual or potential conflict. Provide the full context so Farfetch can implement appropriate safeguards. When uncertain, disclose and seek guidance rather than risk non-compliance.
- Obtain prior approval before undertaking any full time or part time roles at any outside business (except volunteering activities). Ensure that these activities do not detract from your responsibilities, do not use Farfetch resources, and do not create an actual or perceived conflict .
- Inform the People team and obtain prior approval before hiring or directly supervising someone with whom you have a family or close personal relationship.
- Disclose to the Ethics & Compliance team any financial interests you have or plan to have in any entity that does, seeks to do business with, or is in competition with Farfetch.
- Remember that you are prohibited from taking (directly or indirectly) personally for yourselves opportunities that are discovered using Farfetch property, information, or positions.

# 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.

## FARFETCH IS COMMITTED TO

- Prohibiting any form of discrimination or harassment (including hiring decisions) 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.
- Making employment decisions based on job qualifications and merit, including education, experience, ability, and performance.
- Providing a respectful working environment for all employees. Each of us is responsible for fostering a culture of trust, collaboration and respect where individual and diverse perspectives are valued and openly shared.
- Fostering a culture of respect where everyone is treated fairly and with dignity. We comply with all applicable laws regarding immigration, working conditions, wages and hours, and laws prohibiting forced, compulsory and child labor, and human trafficking.
- Creating an environment where all employees feel safe to be themselves and thrive. Discrimination or harassment complaints are taken seriously and handled through our established reporting channels.





# DIVERSITY, EQUITY AND INCLUSION

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## FARFETCHERS MUST

- Ensure that these principles and ways of working, reinforced by our principles, are consciously embedded in our day-to-day working practices and dealings with everyone including internal and external stakeholders, your fellow Farfetchers and our Farfetch partners.
- Contact your People Business Partner or report using any of our Speak Up channels, if you feel you, or any of your colleagues, are being treated unfairly.
- Never refuse to work or cooperate with others because of a person's personal characteristics and other protected characteristics mentioned above. Create a working environment that is free from discrimination and harassment and is free from bullying or other threatening or offensive conduct.
- Treat one another with fairness and courtesy in all workplace interactions.
- Never disclose employment data to a person who does not have a business need, or the authority, or where required, legal authority or the subject's consent.



# OCCUPATIONAL HEALTH & SAFETY

At Farfetch, the health, the safety, and the well-being of our employees, contractors, and visitors is a top priority.

We are committed to a safety culture, providing a safe and healthy working environment, preventing work-related injuries and ill health, and continuously improving our Occupational Health & Safety Management System (OHSMS), in line with our principles and strategic direction.

## FARFETCH IS COMMITTED TO

- Complying with all relevant environmental, health, and safety laws while providing a safe, healthy workplace to prevent injuries and ill health.
- Identifying, eliminating, and mitigating hazards through regular risk assessments, focusing on psychosocial and ergonomic risks.
- Involving employees and their representatives in health and safety decisions, providing training, and raising awareness to ensure everyone is informed, competent, and empowered to act safely.
- Monitoring performance through incident reporting and data analysis, driving proactive improvements and health promotion initiatives.

## FARFETCHERS MUST

- Understand and follow Farfetch's OH&S policies, local procedures, ergonomic guidance, and emergency protocols. Participate in wellness programs and seek help when needed.
- Promptly report incidents, unsafe acts, or conditions to the Health & Safety team and contribute ideas to improve safety, ergonomics, and sustainability
- Not be under the influence of illegal drugs, marijuana, or alcohol during working hours, and ensure that their performance and judgment are never impaired.



# INTELLECTUAL PROPERTY AND CONFIDENTIALITY

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Innovation and investment in the development of products, business processes, systems, and technology are core to our success, and the intellectual property (IP) we create and utilise is among our most valuable assets. These are our trade secrets, are highly sensitive, and thus it's important that all employees understand their role in safeguarding these crucial assets, which are fundamental to our competitive advantage and future growth.

## FARFETCH IS COMMITTED TO

- Actively protecting our intellectual property (including our brands, copyright works and patented technologies) and enforcing our rights against third parties who infringe Farfetch's intellectual property rights or use Farfetch's intellectual property without proper authorisation.
- Ensuring the intellectual property created by employees as part of their employment is owned by Farfetch, and that this is clearly communicated to employees/contractors.
- Not using third-party-owned intellectual property (including trade marks, patented technology, trade secrets and copyright material such as software, images and text) without proper licensing or fair-use justification. We do not knowingly infringe another company's patents, copyrights, trade marks or trade secrets.

## FARFETCHERS MUST

- Follow Farfetch's brand guidelines and policies regarding use of Farfetch brands, logos, and trade marks.
- Sign required documentation relating to the assignment of intellectual property created as part of their employment with Farfetch. Only use and distribute Farfetch's proprietary information to perform Farfetch-related activities (and not for personal gain).
- Safeguard Farfetch's intellectual property. It is the key to our competitive advantage.
- Not provide Farfetch's proprietary information to a third party without the appropriate prior approval and non-disclosure agreement with the third party.
- Not use any source code or other software from a third party in any Farfetch system or as a tool without the appropriate prior approval.
- Not possess, acquire, access, provide access to, or use any Farfetch proprietary information or other intellectual property after leaving Farfetch.

# DATA PRIVACY AND CYBERSECURITY

We care about privacy because it's ethical, and it's also key to protecting our reputation and minimising 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 unless authorised and approved. 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.

## FARFETCH IS COMMITTED TO

- Protecting personal and business information in compliance with applicable laws, regulations, and our policies.
- Respecting and protecting the privacy rights of individuals. Farfetch treats personal information with the care it deserves so that it helps us maintain the trust of our customers, partners, staff, and other individuals who we collect information from. We only use personal data in line with expectations and for specific business reasons, and all reasonable precautions are taken to keep it secure and confidential.
- Protecting our networks, systems, equipment, and information from external and insider threats. As an e-commerce company, Farfetch pays special attention to cybersecurity. We maintain robust controls to protect our systems and information, conduct security testing, and constantly monitor for cyber security threats and vulnerabilities.
- Disclosing material information regarding Farfetch to the public only through approved processes and specific limited channels. Farfetch coordinates its communications to ensure information is accurate, is properly disclosed, and that all those with an interest in the company will have equal access to such information.



# DATA PRIVACY AND CYBERSECURITY



## FARFETCHERS MUST

- Only collect and retain personal and business information that is needed to perform your role. Manage information securely and in compliance with Farfetch's policies, standards, and document management and retention requirements.
- Protect personal and business information from unauthorised or accidental access, loss, disclosure, or destruction. This includes limiting access to authorised individuals who need the information for legitimate business purposes, only using Farfetch-approved systems and devices (and not using personal email, software, or devices to conduct Farfetch business), and being aware of efforts by third parties to improperly obtain personal and business information.
- Engage with the Privacy Legal team and Information Security team before sharing personal data outside the business, or implementing new/changed processes or systems that collect or use Personal data.
- Contact the [Privacy Legal Team](#) upon receiving any personal data requests.
- Never share Farfetch confidential information outside the company without obtaining prior approval from your manager, the Communications team, and the Ethics & Compliance team. This includes making any public statements to media outlets and speaking at events.
- Immediately report to the [Privacy Legal Team](#) or using any of our Speak Up channels, if you discover that personal data has been accessed without authority, leaked, or believe a colleague may be sharing it outside Farfetch.
- Be aware that an employee's use of company property and assets is subject to monitoring by Farfetch without notice. For example, Farfetch may review and monitor usage of company devices including computers and mobile devices, networks (including Wi-Fi), printers, and other systems, in accordance with the Farfetch Acceptable Use Policy.
- We may also conduct video surveillance and workplace searches on company premises, where legally permitted, to help ensure the safety and security of our employees and company property. The video surveillance and workplace searches are conducted strictly for safety and security purposes in compliance with applicable local laws and never to monitor employee performance.

# ANTI-MONEY LAUNDERING (AML) AND SANCTIONS

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As a global marketplace, we are acutely aware of our susceptibility to money laundering and other financial crimes. We are steadfastly committed to preventing our platforms from being used for illicit activities. It is imperative that every employee understands and fulfills their role in identifying and reporting suspicious activities to protect our integrity and the global financial system.

## FARFETCH IS COMMITTED TO

- Complying with applicable anti-money laundering laws and counter-terror financing regulations (e.g., UK Money Laundering Regulations, EU AML Directives)
- Complying with the sanction laws and regulations, including the United Kingdom, the United Nations ("UN"), the United States ("US") as well as all applicable sanctions laws and regulations in the jurisdictions in which Farfetch operates.
- Conducting business only with customers and third parties involved in legitimate business activities, with funds derived from legitimate sources.
- Maintaining risk based "Know Your Customer" due diligence processes regarding prospective customers and other third parties.
- Maintaining controls to detect, investigate, and report suspicious activity to applicable government authorities.

## FARFETCHERS MUST

- Follow the business processes and requirements on collecting and verifying information from our prospective customers, partners and third parties.
- Ensure that there is no transaction with sanctioned parties, such as brands, boutiques, vendors, or other third parties listed on an applicable sanctions list. Contact the Farfetch Ethics & Compliance team to ascertain if a third party you are considering to onboard is a sanctioned entity.
- Follow the business rules regarding acceptable forms of payment.
- Be alert for and escalate any signs of potential money laundering, or other illegal activities, including:
  - 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 or a partner using multiple accounts for transactions under one contract.
  - Payments being made in a currency other than the currency specified in the contract.
  - Offers from a customer to pay in cash or frequent overpayments followed by requests for refunds.
  - Orders, purchases, or payments that are unusual or inconsistent with a customer's or third party's history.

# FINANCIAL INTEGRITY & ACCOUNTING

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Farfetch's success relies on honesty and openness in all dealings. We must be truthful and accurate with colleagues, customers, regulators, and the public. This includes clear, accurate record keeping and reporting.

## FARFETCH IS COMMITTED TO

- Ensuring that our accounting and reporting completely and accurately reflects the economic substance of Farfetch's business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.
- Preparing complete, accurate, and timely financial information for use in reports to management, investors, regulators, and other stakeholders.
- Ensuring that management decisions are based on sound economic analysis backed by comprehensive facts and with appropriate consideration of the short- and long-term benefits and risks.
- Complying with all applicable laws and regulations as well as our policies and internal controls requirements, including regarding the retention of documents and records.

## FARFETCHERS MUST

- Maintain complete, accurate, and timely records and accounts to appropriately reflect all business transactions. 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.
- Create documents that are complete, accurate, and transparent, and follow our policies in determining when to retain and dispose of documents and records.
- Never engage in or support inappropriate transactions, including those that misrepresent the substance of a transaction.
- Maintain effective processes and internal controls that completely and accurately reflect transactions, as well as prevent or detect inappropriate transactions.
- Speak up if you become aware of a questionable transaction or accounting by notifying the Accounting leadership team or using any of the Speak Up channels.



# INSIDER TRADING

At Farfetch, maintaining trust and transparency is paramount, and the information we access through our work is a critical asset that must be handled responsibly. Farfetch strictly prohibits insider trading, which involves using confidential, non-public information obtained through your role for personal financial gain or to benefit others. Adhering to these rules is not only a legal obligation but also fundamental to upholding our integrity and reputation.

## FARFETCH IS COMMITTED TO

- Prohibiting insider trading and use of any material non-public information or insider information for personal gain of employees or others.
  - Inside information is any material, non-public information a reasonable investor is likely to consider important when making an investment decision. Some common examples would include periodic sales or earnings information for Farfetch or Coupang prior to the public release of such information, projections of future earnings or loss or news of a significant event such as a pending merger, a change in operations structure, or a change in executive management.
  - It is also illegal to communicate or tip inside information to others so they can buy or sell stock or other securities based on such information. If you are aware of inside information about Farfetch or Coupang, including our suppliers, you are prohibited from trading directly or indirectly or tipping others to trade in stock or other securities of that company. These same restrictions apply to any person living in your household or who is financially dependent upon you, as well as to any entity or securities account you may control.

# INSIDER TRADING



## FARFETCHERS MUST

- Never buy or sell or recommend others to buy or sell stock or other securities of any company while you have inside information about that company.
- Never disclose inside information about Farfetch or Coupang to anyone outside (including your family members), unless such information has been released to the general public or unless such disclosure has been approved by the Coupang Corporate Securities department and only after the Coupang Corporate Securities department has informed you that adequate steps have been taken to prevent misuse of the information.
- Disclose inside information to people within Farfetch or Coupang only on a need-to-know basis.
- Never attempt to manipulate market prices or spread market rumours or false information.
- Never buy or sell Coupang securities while the trading window is closed if you are subject to trading windows as described in the Insider Trading Policy.
- Obtain pre-clearance before trading in Coupang securities if you are subject to pre-clearance procedures as described in the Insider Trading Policy.

# TRADE CONTROLS AND PRODUCT SAFETY

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We are committed to conducting our global business responsibly and ethically, which includes strict adherence to all international trade controls, sanctions, and export/import regulations. Equally important is our unwavering dedication to product safety, ensuring that all goods sold on our marketplace meet the highest standards of quality and safety for our customers.

## FARFETCH IS COMMITTED TO

- Complying with all applicable laws and regulations that regulate international trade transactions. This includes customs laws, import and export controls, and sanctions that regulate the cross-border transfer of goods and technology.
- Maintaining policies in compliance with applicable laws and regulations regarding sanctioned countries, entities and individuals.
- Implementing policies/procedures to comply with applicable product safety laws and regulations and providing safe, high-quality merchandise to our customers.
- Working diligently with our Partners to promote the safety and compliance of the products sold through our marketplace.

## FARFETCHERS MUST

- Be familiar with the various trade rules and regulations that apply to their respective work area. Ensure a thorough check of all regulatory requirements has been performed before importing and exporting any products.
- Regulatory requirements apply to both the products, technology and the documentation which is provided to the relevant Authorities. Only use reputed customs agents/brokers that have been approved by the Ethics & Compliance team.
- Ensure that documentation is complete and accurate, including description, value, customs code, and the parties to the transaction, and that the trade documentation displays fees or prices in line with commercial considerations and are consistent with market value.
- Understand and comply with all product safety policies that apply to you. Only work with Partners and other third parties that clearly understand and follow our product safety requirements.
- Immediately escalate incidents or reports of any safety concerns or complaints related to products sold on our marketplace to the Legal Regulatory team and the Ethics & Compliance team.



# SOCIAL MEDIA AND EXTERNAL COMMUNICATION

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We communicate thoughtfully and responsibly when posting on Social Media or speaking as a representative of Farfetch. 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 must work hard to protect our reputation and be mindful of what we post.

## FARFETCH IS COMMITTED TO

- Maintaining clear guidelines on usage of social media and external communication channels for employees.
- Prohibiting posts or communications that are offensive, violate anyone's privacy or that could damage Farfetch or our partners' reputation.
- Prohibiting unauthorised distribution or publishing of confidential personal or business information when communicating externally.

## FARFETCHERS MUST

- Not set up or brand any social-media account as "Farfetch" without explicit approval. Follow the Social Media Policy's "don't" list closely before posting or forwarding content. When uncertain, consult your manager or the Communications team first.
- Never use their personal Social Media and any other communications sites in a manner that may negatively impact Farfetch's business or customers. Always ensure that your use of social media or collaboration tools does not compromise confidentiality of personal and business information.
- Be aware that employees are prohibited from vlogging or filming unauthorised videos in work areas during work hours and posting them on personal social media unless the company has specifically authorised them to do so.
- Immediately forward any journalist or media requests to the Communications Team. Decline on-the-spot interviews and seek Communications clearance for public engagements.
- Not accept invitations to speak at conferences or events without prior approval from the Communications team. We maintain a Communications Policy and prior approval is required before sharing externally any facts, figures, or forward-looking statements. Unauthorised predictions, rumours, or strategic disclosures are strictly prohibited.

# CONTACT POINTS & ETHICS RESOURCES

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## CONTACT POINTS

**Ethics & Compliance Team:** You may email the [Farfetch Ethics & Compliance team](#) for advice, in all situations where there is a question, ambiguity or uncertainty, prior to taking action, or to report concerns directly.

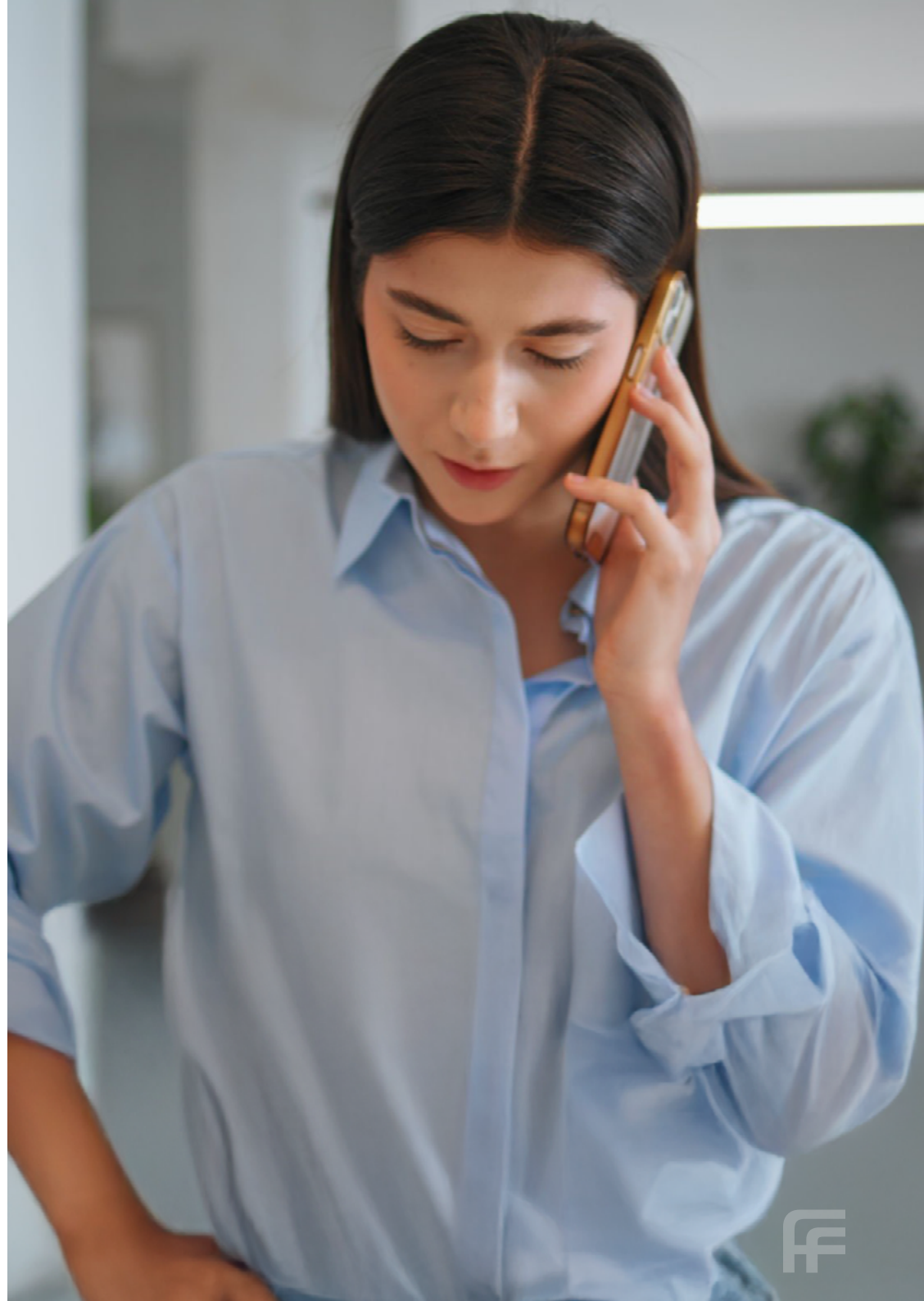
**Speak Up Hotline/Portal:** A 24/7 third-party hotline and secure online portal are available worldwide on [Navex](#). This service allows anonymous reporting if desired. Reporting a concern where you have a reasonable belief that a wrongdoing has occurred, is occurring or will occur in the future, this a vital contribution to Farfetch's success. We are all accountable for ethical behavior. Help us maintain the highest standards by speaking up and following this Code.

**People Team:** Your respective People partner/ teams can also provide assistance and channel your concerns appropriately.

## ETHICS RESOURCES

**Whistleblower Protection:** Farfetch has policies (and legal obligations) to protect anyone who reports ethical concerns based on a reasonable belief. Any retaliation against a reporter is strictly prohibited and may lead to disciplinary action.

**Policies:** Refer to all company policies and procedures, including those referred in this Code, on [MyFarfetch](#) (internal only).



**FARFETCH**