

## **ETHICS HOTLINE POLICY** **Mast Industries UK Limited**

### **WHAT IS THE ETHICS HOTLINE?**

Victoria's Secret & Co. ("**Company**") and its subsidiaries including your employer in either the United Kingdom or Ireland, Mast Industries UK Limited ("**Victoria's Secret**"), have implemented a Code of Conduct ("**Code**") reflecting the Company's commitment to honesty, integrity and ethics. The purpose of the Ethics Hotline is to enable the Company to comply with its applicable legal obligations, including compliance with various anti-corruption legislation; ensure compliance with its rules, standards of conduct and policies as may be in force from time to time; and enable investigations into potential breaches of law, rules, standards of conduct or policies.

### **WHICH INFORMATION MAY BE REPORTED THROUGH THE ETHICS HOTLINE?**

If you believe a violation of the Code or law has occurred, you should report such suspected violation to your immediate supervisor, local manager, or Human Resources. If you are not comfortable reporting locally, or after reporting, you do not believe the report was adequately addressed, you may report concerns via the Ethics Hotline.

### **WHO MAY USE THE ETHICS HOTLINE?**

Company associates, officers and directors may make reports.

Use of the Ethics Hotline by Company associates, officers and directors is optional and voluntary. You will not suffer any adverse consequences for not using the Ethics Hotline. If you decide to use the Ethics Hotline, we request you provide the information requested. Failing to provide that information may make it impossible for the Company to act upon your report. If you are the subject of a report, the collection of your personal data under these procedures may take place without your consent. The Company only processes such personal data in accordance with applicable laws.

### **HOW TO MAKE A REPORT TO THE ETHICS HOTLINE?**

To report matters through the Ethics Hotline, you can go to [vsco.ethicspoint.com](https://vsco.ethicspoint.com) and file a report through the web-based portal or call the country-specific, toll-free number that can be found on the site. Both reporting methods are collectively referred to as the "Ethics Hotline." A call or a web-based report to the Ethics Hotline will be routed initially to an independent third-party hotline administrator ("**Hotline Administrator**").

You may also report matters to the Company in the U.S. by using one of the reporting channels below:

- To the Company's General Counsel by mail at 4 Limited Parkway, Reynoldsburg, OH 43068 US or by email to [GeneralCounselVS@victoria.com](mailto:GeneralCounselVS@victoria.com).
- To Global Ethics & Compliance by mail at 4 Limited Parkway, Reynoldsburg, OH 43068 US or by email to [EthicsVS@victoria.com](mailto:EthicsVS@victoria.com).

### **WHICH CATEGORIES OF PERSONAL DATA MAY BE PROCESSED AS A RESULT OF AN ETHICS HOTLINE REPORT?**

The following categories of personal data may be processed:

- identity, functions and contact details of the reporting person, the persons who are the subject of the report, and the persons involved in the processing of the facts reported;
- facts reported, communications and information collected/reviewed in connection with the reporting and investigation of the facts reported, and investigation report; and
- consequences of the investigation.

### **WHAT ARE THE PURPOSES OF DATA PROCESSING?**

The processing of personal data contained in reports submitted via the Ethics Hotline and obtained throughout any investigation is essential to implement the Code, ensure corporate compliance with applicable

law and maintain integrity and ethics in business practices. It enables the investigation of the reported conduct and any necessary corrective measures based on such investigation, as set out in this policy.

#### **WHAT ARE THE LEGAL BASES FOR DATA PROCESSING?**

The processing is necessary for the legitimate interests pursued by the Company, based on an assessment of the Company's legitimate interests and the relevant data subjects' interests or fundamental rights and freedoms. The Company's legitimate interests include investigating and taking appropriate action related to a potential violation of the Code or of laws and regulations so the Company can comply with the law and its legal obligations. The Company's legitimate interests also include:

- the prevention of fraud and misconduct in respect of accounting, internal accounting controls, auditing matters and reporting;
- the fight against bribery, banking and financial crime and insider trading; and
- the protection of legitimate environmental interests and human rights.

Failure to pursue these legitimate interests may have severe consequences for the Company. When relying on legitimate interests for the processing of personal data, the Company will carry out a balancing exercise between those legitimate interests on the one hand, and your rights and freedoms on the other hand, to ensure it is appropriate to go ahead.

The Company shall endeavor not to collect and process sensitive personal data such as information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life or orientation. To the extent that such sensitive personal data is intrinsic to a report submitted through the Ethics Hotline, the Company will process such data to the extent necessary for the establishment, exercise or defense of legal claims.

#### **IS THE INFORMATION KEPT CONFIDENTIAL?**

The identity of a person making a good faith report will be processed in a confidential manner wherever possible. Only persons with a strict need to know will collect and process the reports. These persons shall be subject to a specific duty of confidentiality. In general, the identity of a person making a report will not be disclosed to third parties or persons who are the subject of the report. However, there are two exceptions to this principle:

- if sharing the person's identity is reasonably necessary for the correct processing of the report and/or to carry out further investigation and/or take measures in the light of the investigation; or
- if disclosing the person's identity is necessary by law (which may also include compliance with employment law, and a request of a regulator to know the identity, if we are legally obliged to comply with such a request).

The reporting person is encouraged to disclose his/her identity instead of reporting anonymously for the following reasons:

- it may be easier to protect the reporting person against retaliation; and
- it is more difficult to follow up on a report and conduct a more complete and thorough investigation if no additional information may be obtained from the source of the report.

The reporting person is also strongly encouraged to report factual statements only regarding actual or suspected violations of law or the Code. If a report is found to be unsubstantiated and the reporting person to make a false declaration in bad faith (i.e., with malicious intent), the accused person may want to pursue a legal case for libel or defamation, in which case the reporting person's identity may have to be disclosed to the incriminated person if national law allows. The Company will only take disciplinary action or other sanctions against a person making a report if the Ethics Hotline is used for malicious reporting.

**WHO IS RESPONSIBLE FOR THE PROCESSING OF THE DATA?**

The Company is responsible for the processing of personal data in conjunction with the Ethics Hotline. The Hotline Administrator processes data received through the website portal and telephone hotline only in accordance with instructions under a data processing agreement.

**WILL PERSONAL DATA BE TRANSFERRED ABROAD?**

Company headquarters and the Hotline Administrator are in the United States. The Hotline Administrator has self-certified to the EU-U.S. Privacy Shield Framework. U.S. companies certified to the EU-U.S. Privacy Shield Framework are recognized as providing an adequate level of data protection under Article 45 of the EU General Data Protection Regulation ("GDPR"). Click [here](#) to view the Hotline Administrator's EU-U.S. Privacy Shield certification. In addition, the Company and Victoria's Secret have entered into an appropriate data transfer agreement based on the European Commission's Standard Contractual Clauses (2004/915/EC) as referred to in Article 46 (5) GDPR to ensure that the transfer of personal data to the Company complies with the requirements of Art. 44 et seq. GDPR.

Copies of the data transfer agreement referred to in this Section are available by contacting [VSprivacy@victoria.com](mailto:VSprivacy@victoria.com).

**WHAT HAPPENS TO YOUR REPORT?**

The Hotline Administrator will transmit Ethics Hotline reports to Global Ethics & Compliance and select senior members of the HR Team charged with investigations for coordination of the global investigation. Your report will be investigated by relevant Company personnel in the U.S., and advisors, forensic or audit firms as appropriate depending on the subject matter of the report.

If a report is verified or substantiated after investigation, insofar as required to remedy and/or sanction the verified misconduct, the line manager(s) of the affected associates will be informed, if necessary based on the seriousness and nature of the verified report.

The information collected in the report may be disclosed to advisors (such as legal, auditing, finance and accounting, information technology and human resources advisors or similar consultants and advisors), law enforcement or government authorities as necessary to comply with legal requirements or in the course of a legal action, and to legitimate recipients of communications under applicable laws, where required by law or necessary for the purpose of, or in connection with, any legal proceedings. The information may also be provided to service providers acting as data processors for the Company (e.g., an IT services provider) where required for the performance of such services. In addition, the Company, its subsidiaries, or its affiliates may share, disclose, or transfer the collected information to other parties or third parties to facilitate a merger, sale, acquisition, reorganization, dissolution, liquidation, transfer (or similar type of transaction) of corporate entities or business units.

The Company will limit the number of individuals involved in any investigation to the extent consistent with a full and complete investigation. Some of these individuals may be in countries where the level of data protection is not equal to that of the United Kingdom. Transfers of personal data to such countries will be made in compliance with applicable law. The Company will take the measures required to protect the security and the confidentiality of the data transferred (such as entering into the Standard Contractual Clauses published by the European Commission or putting in place other adequate controls).

**INFORMATION TO ASSOCIATES WHO ARE THE SUBJECT OF A REPORT**

Associates will be informed as soon as possible after a report is recorded of the fact that they are the subject of a report. However, such information can be delayed if this is necessary for investigatory or other evidentiary purposes.

**NO RETALIATION**

A person cannot be dismissed or subject to detriment by the Company for making a report, provided the report is made in good faith.

**WHAT ARE THE CONSEQUENCES OF AN ABUSIVE REPORT?**

Abusive reports, including reports made in bad faith, may result in disciplinary action, up to and including termination of employment, as well as judicial sanctions in accordance with applicable employment laws and any other applicable rules or regulations. Good faith reports shall not lead to disciplinary action, even if the facts reported subsequently prove to be incorrect or do not give rise to any action.

**INFORMATION RETENTION**

Any information collected because of a report will be kept only as long as necessary and for the purpose for which it has been collected in compliance with applicable law. Specifically, personal data relating to reports found to be unsubstantiated shall be deleted without delay. Personal data relating to reports giving rise to an investigation shall be deleted promptly and usually within 2 months of completion of the investigation, unless disciplinary measures or legal proceedings are initiated as indicated above, in which case the data shall be kept until the conclusion of such proceedings. More information about record retention periods and practices is available from [EthicsandcomplianceVS@victoria.com](mailto:EthicsandcomplianceVS@victoria.com).

**RIGHTS WITH RESPECT TO PERSONAL DATA**

Individuals (such as any reporting person or person subject to a report) have a number of rights in relation to the personal data processed as described in this policy. These are summarized below. Please note that exercising these rights is subject to certain requirements and conditions as set forth in applicable law (e.g. the GDPR):

Right of Access

Individuals have the right to obtain from the Company confirmation as to whether their personal data is processed, and if it is, to request access to that personal data including, without limitation, the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. Because it may be necessary to take into account the interests of others, this is not an absolute right. Individuals have the right to obtain a copy of the personal data undergoing processing. For additional copies requested, we may charge a reasonable fee based on administrative costs.

Right to Rectification

Individuals may have the right to rectify inaccurate or incomplete personal data concerning them.

Right to Erasure (Right to be Forgotten)

Individuals may have the right to request erasure of personal data concerning them.

Right to Restriction of Processing

In limited circumstances, individuals may have the right to request restriction of processing of their personal data, however where the personal data is processed for the purposes described in this policy, there may be a legitimate interest in processing data in that way which may override such a request.

Right to Object

Individuals have the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data by us based on legitimate interests and we can, subject to limited exceptions, be required to no longer process their personal data. Exercising this right will not incur any costs. If you wish to exercise these rights, you should contact [VSpivacy@victoria.com](mailto:VSpivacy@victoria.com). Associates may exercise the rights against the Company, even if such claims relate to the processing of personal data by one or more of the data recipients identified in this policy. If you are not satisfied with our response, you also have the right to lodge a complaint with the Information Commissioner's Office.

**MISCELLANEOUS**

For further information about this Policy, or to exercise any rights with respect to your personal data, please contact Global Ethics & Compliance at [EthicsandcomplianceVS@victoria.com](mailto:EthicsandcomplianceVS@victoria.com).

This Policy does not form part of your contract of employment with Victoria's Secret & Co. The Company may issue further guidance or amendments to this Policy from time to time and/or in line with legal developments.