



Section 172 Statement and Statement of Corporate Governance Arrangements

Extracts from the company accounts and reports of Apple
Retail UK Limited for year ended 30 September 2023

Apple Retail UK Limited
Registered number 04996702

Strategic Report (continued)

Section 172 Statement

The directors of the Company have acted during the financial period in a way that they consider, in good faith, would be most likely to promote the success of the Company for the benefit of its member, and in doing so they have had regard to the matters set out in section 172(1) of the Companies Act 2006. Highlighted below are certain aspects of the duties under section 172(1) that the directors consider most relevant to the Company, and the key stakeholders of the Company. This statement, and the other statements referred to herein, include information both specific to the Company and to Apple as a whole.

The directors receive training relevant to their role, including on directors' duties, to support their consideration of stakeholder impact.

The directors have delegated day-to-day engagement with stakeholders to management with relevant subject matter expertise, but they oversee this engagement and consider stakeholder impacts in relation to key decisions that are escalated to the board.

Considering long-term impact of decisions

Apple Inc. and its subsidiaries, are demonstrating every day that business can and should be a force for good. And we've made important progress over the last year through our initiatives. At Apple, we're committed to leaving the world better than we found it, and the directors seek to have a long-term mindset when making decisions on behalf of the Company. That means supporting communities with global and local initiatives, investments, and donations that combat inequity, expand access to opportunity, and help respond to urgent needs.

We also know that we can impact communities around the world by creating and sustaining local jobs. As our teams continue to grow, we're proud to foster innovation, opportunity, and economic support across the globe.

Employees

At Apple, we work every day to create an inclusive, safe, and supportive environment for all our team members. We're always finding new ways to invest in our teams' development and to encourage collaboration and creativity. And we provide strong and comprehensive benefits and highly competitive total compensation. We believe we're a better and more innovative company when people have support and the opportunity to do their best work. We describe further how the Company engages with employees in our *statement of engagement with employees*, on pages 11 to 13.

The community, suppliers, customers and others in a business relationship

We've worked to embed respect for human rights across Apple in the technology we make, in the way we make it, and in how we treat people. Our Human Rights Policy, which was adopted by the Company following approval by the directors of the Company, governs how we treat everyone. We're deeply committed to respecting internationally recognized human rights in our business operations, as set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights (together, the "International Bill of Human Rights") and the International Labour Organization's ("ILO's") Declaration on Fundamental Principles and Rights at Work, and our approach is based on the UN Guiding Principles on Business and Human Rights ("UNGPs"). See our *statement of engagement with suppliers, customers and others in a business relationship with the Company*, on pages 14 to 17 for more detail on how we monitor and nurture our business relationships.

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Strategic Report (continued)

Section 172 Statement (continued)

The environment

The Company participates in the global ambitions and targets of the Apple Inc. group. Apple has dedicated our resources and best thinking to considering the environment in everything we do: the energy that powers our operations, the materials in our devices, the companies we do business with, and the health and safety of those who make and use our products.

Apple is committed not only to protecting the environment, but also the health and safety of our employees, customers, and the global communities where we operate. We recognize that by integrating sound environmental management practices into all aspects of our business, we can offer technologically innovative products and services while conserving and enhancing resources for future generations. Apple strives for continuous improvement in our environmental management systems and in the environmental quality of our products, processes, and services. See our *streamlined energy and carbon report* on pages 19 to 20 for more information on the Company's energy and carbon usage and Apple's climate action commitments, and see our *non-financial sustainability information statement* on pages 7 to 8 for more information on climate-related risks and opportunities of the Company.

Business Conduct

Apple's Business Conduct Policy (the "Policy"), which has been adopted by the Company following approval by the directors of the Company, applies to all full time and part-time employees and is available to employees in over 20 languages. The Policy outlines the principles of honesty, respect, confidentiality, and compliance that guide Apple's business practices and also apply to Apple suppliers, contractors, consultants, and other business partners when providing goods and services to Apple or acting on our behalf. See our *statement of engagement with employees* on pages 11 to 13 for more information on ethics and compliance policies and practices at the Company.

Principal decisions of the Company

As mentioned in the *statement of corporate governance arrangements*, decisions which are of strategic importance, are commercially material, or have a significant impact on key stakeholders are considered principal decisions of the Company. The board of the Company has taken the following principal decisions during the financial period:

Declaration and payment of dividend to shareholder

A dividend of £107,644,000 (FY22: £nil) was proposed and paid during the year. In proposing and approving the payment of such dividend, the directors carefully considered its financial impact on the Company (taking into account the impact on the Company's stakeholders), including whether there were any actual or reasonably foreseeable contingent or prospective liabilities the payment or settlement of which would be jeopardised by the payment of the dividend. The directors also considered carefully the effect that the dividend would have on the Company's ability to pay its debts as they fell due, having regard to the entirety of the Company's business and the actual and contingent liabilities (present and future) inherent in that business.

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Strategic Report (continued)

Section 172 Statement (continued)

Expansion of online store

In November 2023, the Company expanded its online store fronts. The directors expect the expansion to have a positive impact on turnover and operating profit.

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Directors' Report (continued)

Statement of Corporate Governance Arrangements

The Company has adopted a corporate governance policy (the “Corporate Governance Policy”), which reflects the global policies of Apple Inc., the Company’s ultimate parent company. The Corporate Governance Policy has not been updated in the financial year ended 30 September 2023 but has since been updated in March 2024. Apple’s corporate governance policies can be found on Apple’s website (<https://investor.apple.com/leadership-and-governance/default.aspx>). The global Apple policies reflected in the Corporate Governance Policy include, amongst others, Apple Inc.’s Business Conduct Policy, Anti-Corruption Policy, Privacy Policy, Human Rights Policy and Supplier Code of Conduct.

Apple’s core values, which further guide the Company’s directors and management, are:

- **Accessibility.** We build accessibility features into all of our products, because we believe that technology should meet people where they are, not the other way around.
- **Education.** We believe education is a great equalizing force and a powerful source of opportunity for all.
- **Environment.** We believe doing right by the planet is good for people, for communities, and for business.
- **Inclusion & Diversity.** We’re committed to making our company more inclusive and diverse.
- **Privacy.** We believe privacy is a fundamental human right.
- **Racial Equity and Justice.** We are all accountable for the urgent work of building a more just and equitable world.
- **Supply Chain Innovation.** We hold our suppliers to the highest standards for labour and human rights, and environmental stewardship across our global supply chain.

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Directors' Report (continued)

Statement of Corporate Governance Arrangements (continued)

These values, including how they are applied by the Company, are discussed in more detail in our *statement of engagement with employees* on pages 11 to 13; *statement of engagement with suppliers, customers and others in a business relationship* with the Company on pages 14 to 17; our *streamlined energy and carbon reporting statement* on pages 19 to 20; and our *non-financial and sustainability information statement* on pages 7 to 8.

In order to ensure that the directors of the Company fulfil their obligations to the Company and maintain the highest standards of corporate governance, the Corporate Governance Policy sets out guidelines on board composition, director training and requirements as to in-person board meetings. The current board of the Company represents a diverse mix of skills and experience responsive to the needs of the Company. The directors have received training relevant to their role during the financial period. The directors have taken decisions on behalf of the Company throughout the financial period at board meetings (including, amongst other matters, matters of greatest significance to the Company and its stakeholders) and by means of written resolutions. The Corporate Governance Policy's requirements relating to directors of the Company have been met during the financial period.

In accordance with the Corporate Governance Policy, directors have delegated certain decision-making authority to management. Management means any individual or body with authority for making decisions on behalf of the Company including, for example, local, regional, and line-of-business management having relevant subject matter expertise and job responsibility. However, the directors retain oversight of delegated matters and, specifically, the Corporate Governance Policy defines as "principal decisions" certain decisions which are considered to be of strategic importance, commercially material, or have a significant impact on key stakeholders. Matters categorised as principal decisions require approval by the board of directors, whether or not they are required as a matter of law to be escalated to the board. Principal decisions of the Company made during the financial period in compliance with the Corporate Governance Policy are discussed in the Company's *section 172(1) statement*, on pages 5 to 7.

The Company has undertaken two principal decisions during the financial period, which are discussed in the Company's *section 172(1) statement*, on pages 5 to 7.