

RESPONSIBLE SOURCING

ANIMAL WELFARE, SUSTAINABLE MATERIALS & ENVIRONMENTAL COMMITMENT

ANIMAL WELFARE

Animal welfare is defined by the World Organization for Animal Health (OIE) as ‘the physical and mental state of an animal in relation to the conditions in which it lives and dies’. We support the internationally accepted Five Freedoms for animal welfare:

1. **Freedom from hunger and thirst:** by ready access to fresh water and a diet to maintain full health and vigour.
2. **Freedom from discomfort:** by providing an appropriate environment including shelter and a comfortable resting area.
3. **Freedom from pain, injury or disease:** by prevention through rapid diagnosis and treatment.
4. **Freedom to express normal behaviour:** by providing sufficient space, proper facilities and company of the animal’s own kind.
5. **Freedom from fear and distress:** by ensuring conditions and treatment which avoid mental suffering.

We do not commission or condone the use of animal testing of any of our products or formulation either during production or on finished products. It is our supplier’s responsibility to assure compliance and to inform all their downstream suppliers and factories of our Animal Welfare standards.

Our suppliers must assure compliance to Vegan Certification Standards via third party auditing when required. We prohibit all materials listed below for all of our products, in addition to those legally required in the country of manufacture and/or sale of our products:

- All animal furs.
- Endangered species as defined by Convention on International Trade in Endangered Species (CITES).
- All animal skins excluding shearling, buffalo, cow and sheep hide providing these are sourced as a by-product of other industries which align to our animal welfare policy.
- All rabbit fibres.
- Down or feathers from live-plucked birds or from farms practicing live-plucking or force-feeding practices.
- Plastic microbeads.

We also prohibit the practices listed below for all of our products, in addition to those legally required in the country of manufacture and/or sale of our products:

- Sheep mulesing.
- Sandblasting.

Animal testing of any product, formulation or ingredient, either during production or on finished products.

CERTIFIED FIBRES & MATERIALS

Our suppliers and their supply chains, who produce and manufacture organic, recycled and/or sustainable fibres and materials must be certified by globally recognised fibre and material standards. Suppliers must provide evidence of their compliance with these standards.

We prohibit use of the materials listed below in all of our products, in addition to those legally required in the country of manufacture and/or sale:

- Any fibres and materials sourced from high-risk regions.

We accept the below globally recognised fibre and material standards:

- Better Cotton Initiative
- Global Organic Textile Standard (GOTS)
- Organic Content Standard (OCS)
- Global Recycled Standard (GRS)
- Recycled Content Standard (RCS)
- Forest Stewardship Council (FSC)
- Certified sustainable man-made cellulosic alternatives as directed by the Cotton On Group
- Australian Illegal Logging Prohibition Act 2012 and any equivalent logging legislation in the countries in which the Goods are to be sold.

SUPPLIER ENVIRONMENTAL PERFORMANCE

Our suppliers and factories must strive to maximize sustainable resources to reduce their carbon footprint and improve environmental performance. Our suppliers and factories must comply with all applicable national and international environmental laws, standards and regulations. Our suppliers shall develop, implement, and maintain environmentally responsible business practices.

ENVIRONMENTAL PERFORMANCE AUDIT

Our suppliers and factories are expected to conduct an environmental risk assessment and implement an environmental policy that covers all areas identified in the assessment. Our Environmental Performance Audit covers topics across chemical safety, hazardous waste and disposal, waste water treatment systems and is included in the Ethical Sourcing Audit. Any non-conformances identified are detailed with a Corrective Action Plan and provided to our suppliers and factory managers for remediation.

CHEMICAL MANAGEMENT

Our suppliers and factories must ensure all chemicals are used safely and responsibly with the objective being to prevent, or to reduce to an absolute minimum, the exposure of chemicals to the workforce and any associated health risks. All applicable laws and regulations must be adhered to. Our suppliers and factories must take effective steps to prevent environmental harm from the use of chemicals within their operations. Our suppliers must implement a risk assessment program and ensure an annual review of risks is conducted. All harmful AZO dyes as detailed in American Apparel & Footwear Association RSL shall be 0 ppm.

MANUFACTURING RESTRICTED SUBSTANCES LIST AND RESTRICTED SUBSTANCES LIST

Our Manufacturing Restricted Substances List and Restricted Substances List must be complied with by our suppliers for all our product including, but not limited to, apparel, footwear, textiles, hard goods, toys, cosmetics, in addition to those legally required in the country of manufacture and/or sale.

Storage, handling, use and disposal of all chemicals used must comply with the MSDS (Material Safety Data Sheet) of each chemical product.

Trainings on our Manufacturing Restricted Substances List and Restricted Substances List must be provided to all employees in chemical related position and trainings should be documented. Our suppliers and their factories must establish and document an adequate process to systematically identify, monitor and verify compliance of products against our Restricted Substances List.

MANUFACTURING RESTRICTED SUBSTANCES (MRS�)

A MRS� is a list of chemical substances subject to a usage ban within the facility. The MRS� applies to chemicals used all our product manufacturing including, but not limited to, apparel, footwear, textiles, hard goods, toys, cosmetics. Chemicals in the MRS� include solvents, cleaners, adhesives, paints, inks, detergents, dyes, colourants, auxiliaries, coatings and finishing agents used during raw material production, wet processing, maintenance, wastewater treatment, sanitation and pest control. There should be no intentional use of any MRS� listed substances in facilities that process materials used in the production of our products.

We use the most recent edition of the Manufacturing Restricted Substance List (MRS�) published by ZDHC <https://www.roadmaptozero.com/> and the European Union requirements – Substances of Very High Concern (SVHC) list <https://echa.europa.eu/candidate-list-table>

Article 33(1) of the REACH Regulation states that manufacturers and importers of articles (products) are required to notify their customers of the presence of any Substances of Very High Concern (SVHC) in their products exceeding 0.1% by weight and provide instructions on safe use of the product.

RESTRICTED SUBSTANCES LIST (RSL)

The RSL includes only those materials, chemicals, and substances that are restricted or prohibited (banned) in finished apparel, footwear and textile products because of a regulation or law. In each case, the RSL identifies the most restrictive regulation. The RSL does not include regulations that restrict the use of substances in production processes or in the factory; rather the focus is on whether or not the substance can be found in finished home textile, apparel, and footwear products at a certain level.

We use the most recent edition of the Restricted Substance List (RSL) published by the American Apparel & Footwear Association https://www.aafaglobal.org/AAFA/Solutions_Pages/Restricted_Substance_List

As a supplier of product to the EU, UK and USA we are required to comply with the following restricted and banned substances lists. These include materials, chemicals and substances that are restricted or prohibited (banned) in all our product because of a regulation or law. In each case the lists identifies the most restrictive regulation. The focus is on whether or not the substance can be found in the finished product.

Restricted Substances List (RSL) https://www.aafaglobal.org/AAFA/Solutions_Pages/Restricted_Substance_List

Proposition 65

<https://oehha.ca.gov/proposition-65/proposition-65-list>

FDA prohibited & Restricted Ingredients in Cosmetics list

<https://www.fda.gov/cosmetics/cosmetics-laws-regulations/prohibited-restricted-ingredients-cosmetics>

FDA Substances Prohibited from Use in Human Food

<https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-189>.

FDA Inventory of Food Contact Substances List

https://www.cfsanappsexternal.fda.gov/scripts/fdcc/index.cfm?set=IndirectAdditives&sort=Sortterm_ID&ore=ASC&showAll=true&type=basic&search=

REACH Annex XVII

<https://echa.europa.eu/substances-restricted-under-reach>

European Food Safety Authority

<https://eur-lex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32002R0178&from=EN>

Food Contact Material

<https://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:338:0004:0017:en:PDF>

The Storage, handling, use and disposal of all chemicals used must comply with the MSDS (Material Safety Data Sheet) of each chemical product.

Training on our Manufacturing Restricted Substances List and Restricted Substances List must be provided to all workers in chemical related positions and trainings should be documented. The factory must establish and document an adequate process to systematically identify, monitor and verify compliance of products against Restricted Substances List.

VENTILATION

- Our suppliers and their factories must ensure that adequate ventilation systems exist in any area where clear ventilation is required in any factory.
- Our suppliers and their factories must ensure that factory pollution is handled according to the local laws and guidelines for the handling of waste emissions from any factory at all times.

CHEMICAL SAFETY AND EDUCATION

- Our suppliers and their factories must implement chemical safety policy and procedures to ensure chemical storage, housekeeping, handling and disposal is controlled to prevent injury to workers and the environment.
- Our suppliers and their factories must ensure all training is recorded/documentated and the training records held to validate the necessary training has occurred for all workers who handle chemicals.
- Our suppliers and their factories must identify and register a nominated person as the key contact for environmental performance.

RESPONSIBLE DISPOSAL AND WATER MANAGEMENT

- Our suppliers and their factories must ensure they are compliant with all applicable laws relating to waste water treatment at all times. They must immediately implement the required changes to ensure it complies with all laws and regulations and must ensure all waste discharges are within regulatory standards/limits. Our suppliers and their factories must:
- Ensure hazardous material is dumped by licensed chemical waste management agent and the waste is only dumped at an approved government site that handles hazardous waste.
- Ensure all waste discharges are within regulatory standards/limits.
- Ensure all sludge is disposed of through legal processes and documentation is available to validate this process.
- Implement water management programs to recycle/reuse water and reduce the environmental impact of waste water in this facility

