



Responsible Sourcing Policy

June 2026



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SCOPE

All facilities supplying materials and products to N Brown Group must comply with the requirements outlined in the Responsible Sourcing Policy (RSP). This policy covers materials used in our products, highlighting the risks associated with these materials and the standards required for their use.

The RSP also covers another significant area of concern in our supply chain, specifically in wet processing, which involves high water, energy, and chemical use. This includes operations such as dyeing, printing, laundering, finishing, coating, tanning, and the production of components and packaging materials. By adhering to the requirements outlined in this policy, facilities can reduce their environmental impact, promote responsible sourcing practices, and safeguard consumers and workers from exposure to hazardous chemicals.

This policy addresses the following areas:

- **Supplier Transparency and Product Traceability** – Requirements for declaring associated tiered suppliers and responsible material certification
- **Animal Welfare** - Requirements and standards for the ethical treatment of animals in the supply chain.
- **Forestry Risk and Timber Use** - Guidelines for responsible sourcing of timber and wood-based materials.
- **Cotton Sourcing** - Standards for sourcing cotton, including restrictions on specific regions.
- **Chemical Management** - Minimum standards for the use and management of chemicals in the manufacturing process.

This document should be read in conjunction with the Environmental Policy and Climate Policy as part of our broader Environmental Protocol.

OBJECTIVES & RATIONALE

The RSP is integral to N Brown Group's commitment to ethical business practices, environmental stewardship, and social responsibility. As a company that sources a diverse range of materials from various global suppliers, we recognise our role in influencing positive change within our supply chain. This policy is established to mitigate risks associated with sourcing materials and manufacturing processes, particularly concerning environmental impact, human rights, and product safety.

We understand that the sourcing decisions we make not only affect the quality and integrity of our products but also have broader implications for communities, ecosystems, and economies around the world. The RSP aims to ensure that our products are manufactured under safe, fair, and environmentally sound conditions, thereby supporting sustainable development and fostering trust with our customers, partners, and stakeholders.

- **Promote Ethical Sourcing Practices** - Ensure that all materials and products sourced by N Brown Group are obtained in a manner that respects human rights, animal welfare, and labour laws.
- **Reduce Environmental Impact** - Minimise the environmental footprint of our supply chain by implementing sustainable practices.
- **Ensure Product Safety** - Protect the health and safety of consumers by requiring suppliers to adhere to strict quality and safety standards, particularly concerning the use of hazardous chemicals and materials.
- **Support Transparency and Accountability** - Promote a culture of transparency and accountability among our suppliers by requiring regular reporting, assessments, and audits to ensure compliance with the RSP.
- **Encourage Continuous Improvement** - Inspire continuous improvement among our suppliers by providing guidance and support to help them meet and exceed the standards outlined in the RSP.

BACKGROUND

This policy has been developed to meet changes in legislation, industry best practices, and the growing expectations of our stakeholders. As a company sourcing a wide range of materials, both natural and synthetic, we understand the complexities and challenges involved in maintaining a responsible supply chain. Materials like cotton, timber, and animal-derived products each present unique risks, from environmental degradation and deforestation to animal welfare concerns. Similarly, the use of chemicals in the manufacturing process poses significant risks to workers, consumers, and the environment. The potential environmental impacts of these processes are considerable, including effluent discharge, air emissions, and hazardous waste.

To address these risks, N Brown Group's RSP sets forth strict guidelines and minimum standards for animal welfare, forestry practices, and cotton sourcing and chemical management. Our policy requires suppliers to monitor their environmental impacts and implement improvement plans as part of their operational strategies. We are committed to working with our suppliers to enhance sustainability, reduce emissions, and ensure compliance with our standards.

The RSP will be annual with the most up-to-date requirements of both N brown and the industry. We will only source from suppliers who demonstrate a commitment to reducing their environmental footprint, managing chemicals responsibly, and adhering to the highest standards of ethical sourcing. Through these efforts, N Brown Group strives to protect the environment, promote social responsibility, and deliver safe, high-quality products to our customers.

COMPLIANCE

All suppliers working with N Brown Group are required to adhere to the Responsible Sourcing Policy (RSP). Compliance with this policy is essential to ensure the safety of our customers, protect workers, and safeguard the environment. N Brown Group reserves the right to conduct further investigations into any non-compliance and take appropriate action based on the findings.

Monitoring and Verification:

To ensure ongoing compliance, N Brown Group implements a robust monitoring system that includes:

- **Verification Processes:** We use verification processes aligned with the certifications, standards, and initiatives we recognize to manage compliance effectively.
- **Risk Management Due Diligence:** We conduct due diligence to confirm the origin of materials. For suppliers from high-risk regions, documentation verifying the origin of materials must be provided within 72 hours upon request.

Adhering to these compliance requirements is crucial for maintaining a productive and ethical partnership with N Brown Group. We are committed to upholding the highest standards and require our suppliers to do the same.

Consequences of Non-Compliance

Any breach of this policy, including the provision of misleading information regarding the sourcing of materials or failure to meet the specified requirements, constitutes a breach of contract. Such breaches may result in:

- Termination of the business relationship.
- Liquidated damages.
- Rejection of products.
- Return of goods to the manufacturer at the supplier's expense.

1.0 SUPPLIER TRANSPARENCY AND PRODUCT TRACEABILITY

As part of our commitment to ethical sourcing and our Transparency Pledge, we are actively mapping our supply chain to gain full visibility into where our products and materials originate. Transparency enables us to understand our supply chain better, assess risks, and measure the impact of our sourcing practices across regions.

Our ongoing efforts towards transparency and traceability focus on identifying the origins of raw materials and other resources. We strongly encourage suppliers to proactively map their own supply chains to trace raw material origins, in alignment with this Responsible Sourcing Policy and as part of their commitment to our Transparency Pledge.

Suppliers must be able to provide detailed information on the origin of materials and maintain traceability through every stage of the chain of custody when required. Failure or refusal to provide sufficient evidence may harm business relationships and could lead to further actions, including but not limited to the rejection or return of goods to the manufacturer, and liquidated damages assessed on a case-by-case basis.

To support these efforts, tier one suppliers are required to assist in mapping our tier two and tier three facilities. The list of these facilities is updated every six months to ensure we maintain accurate and current supply chain records. This regular updating process is crucial for maintaining up-to-date and transparent sourcing information.

N Brown Group suppliers are responsible for ensuring their upstream supply chains adhere to internationally recognised guidelines for transparency and traceability. This includes providing information and documentation as required by our policy to demonstrate compliance and support our transparency initiatives.

1.1 LICENSED FIBRE STANDARDS, EVIDENCE REQUIREMENTS AND CHAIN OF CUSTODY

To uphold responsible material sourcing and ensure the accuracy of product claims, all suppliers must maintain clear, verifiable documentation for any certified, traceable, or claim bearing materials supplied to N Brown Group. Physical and digital evidence (“the paper trail”) is essential for demonstrating compliance with recognised standards, validating product attributes, and ensuring product safety.

Suppliers must only use certified materials when approved and must provide full documentation to support any associated claim, including the following:

Licensed Fibres

N Brown Group uses a range of licensed fibres, including but not limited to Lenzing, Repreve, Birla, and FSC-certified fibres. These fibres are verified through their own proprietary or platform-based assurance systems. Suppliers must ensure they are capable of processing and verifying the use of these fibres through the required platforms and must maintain accurate evidence as part of the verification process.

Content Claim Standard (CCS) and Textile Exchange Standards

Suppliers using CCS-eligible materials, including GRS (Global Recycled Standard), RCS (Recycled Claim Standard), OCS (Organic Content Standard), and GOTS

(Global Organic Textile Standard) must comply fully with Textile Exchange system requirements. This includes:

- Holding a valid Scope Certificate (SC) covering the specific product categories and processing steps conducted.
- Providing a Transaction Certificate (TC) for each shipment or batch of certified goods delivered to N Brown Group.
- Ensuring all upstream suppliers in the chain of custody also maintain valid certification.

See Section 1.2 below for further details of SC and TC requirements.

Physical, Traceable Better Cotton

Under our Responsible Cotton Sourcing commitments (see page X), suppliers must provide verifiable documentation demonstrating physical traceability of cotton from farm to final product, in line with the updated Better Cotton guidelines transitioning from traditional Mass Balance to Certified Mass Balance and Physical/Traceable Cotton models.

Evidence may include:

- Gin level documentation
- Bale identification
- Approved chain of custody records
- Documentation demonstrating physical segregation (where applicable)

1.2 SCOPE CERTIFICATES AND TRANSACTION CERTIFICATES

To maintain the integrity of all fibre related product claims, the following requirements apply:

Supplier Obligations

- Suppliers must maintain current and valid Scope Certificates for all certified processes and facilities used in N Brown Group products.
- A Transaction Certificate must accompany every sale of certified material to N Brown Group.
- TCs must accurately reflect the product, quantity, production dates, and certified entities involved.
- Certificates must be made available upon request at any point during production, audit, or post-delivery review.

Enforcement and Non-Compliance

Failure to provide the required Scope Certificates, Transaction Certificates or equivalent documentation will be considered a breach of our responsible sourcing expectations and may result in:

- Deduction or removal of any cost uplift associated with certified materials.
- Liquidated damages where misleading or dishonest information is provided.
- Invalidation of any product claims linked to uncertified materials.
- Delays to approval, production or shipment.
- Rejection or return of goods at the supplier's expense.
- Restriction or removal of approval to use specific certified materials for future orders.

These requirements will also be integrated into the Supplier Charter and communicated via the Supplier Portal, including documentation requirements, upload timelines and evidence standards.

1.3 INTERNAL PROCESSES, TRAINING AND SUPPLIER SUPPORT

To ensure consistent application of these requirements across the business:

- Training programmes for Buying and QA teams will specify what evidence must be requested and how to review supplier documentation.
- A defined process map will guide internal teams through verification, documentation management, and escalation steps.
- The Supplier Portal will serve as the central hub for certification uploads, renewal tracking, and supplier notifications.
- Guidance documents and examples of valid Scope Certificates, Transaction Certificates and traceability documentation will be made available to suppliers.

2.0 ANIMAL WELFARE



In alignment with European's Parliament's due diligence surrounding animal welfare, N Brown Group firmly believes that it is not acceptable for animals to suffer in the name of fashion and/or beauty. We believe our customers should be able to purchase our products with confidence and assurance that there is no involvement of cruelty in the development and manufacturing of our products.

In the same way, we are committed to upholding responsible and ethical standards we expect the same of our suppliers and partners. Where suppliers' materials have been sourced from farmed animals, suppliers are required to ensure that industry best practice is adopted to safeguard animal welfare at all stages of the animal's lifecycle and slaughter process.

We are working towards better transparency for the products used and recognise certifications such as the Responsible Wool Standard (RWS).

2.1 THE FIVE DOMAINS

Industry best practice is founded on *The Five Freedoms* as outlined by the World Organisation for Animal Health. A [European Parliament Animal Welfare briefing](#) has stated a shift in framing towards [The Five Domains](#) adapted by FOUR PAWS. Our values align with the *Five Domains* which ensure the focus is on animals achieving an overall positive quality of life by having:

1. Good Nutrition
2. Good Physical Environment
3. Good Health
4. Appropriate Behaviour Interactions
5. Positive Mental Experiences

2.2 MATERIAL ETHICS

Suppliers shall not use the following animal materials:

- × Endangered, wild, or exotic caught species
- × Fur, including Mongolian lambs' fur, or rabbit hair
- × Shell including mother of pearl, teeth, bone, antler, mohair or silk
- × Ivory is completely banned (as required by law)
- × In the exceptional circumstances where a product can only be sourced from the wild, suppliers have the responsibility to ensure that population levels are sustained, and natural habitats are protected.

In addition, we require suppliers to:

- ✓ Only source materials as a byproduct of the meat industry with suppliers that exhibit and comply with good animal husbandry.
- ✓ Clearly label synthetic products which are manufactured to look like animal products as 'faux' on the product description and care labelling.
- ✓ Clearly label the type of animal derived material on the product description and care labelling. We will test products to ensure they are compliant with regulations and our RSP.
- ✓ Share this policy with their supply network.

2.3 MATERIAL SPECIFIC REQUIREMENTS

The listed specification must be adhered to when using the following animal materials. Failures to comply may constitute a breach of contract.

2.3.1 ENDANGERED, WILD, OR EXOTIC CAUGHT SPECIES

- N Brown does not accept the use of endangered, wild, or exotic caught species that appear on either the International Union for the Conservation of Nature (IUCN) or the Convention on International Trade in Endangered Species (CITES) red lists.
- Animal materials listed on such databases must not be used in any of our products.

2.3.2 FUR

- N Brown does not accept the use of any real fur or pelts, whether from farmed or wild sources, including Mongolian lambs' fur and rabbit hair
- Test reports will be required to provide evidence of construction.
- Any supplier found to be substituting fake for real fur will be in breach of contract and may be subject to cancellation of any outstanding orders and removal from our supplier list.

1.3.3 ANGORA, MOHAIR & CASHMERE

- N Brown does not accept the use of angora or mohair, due to the production methods involving harvesting methods that have potential to cause pain or distress to the animal.
- Where cashmere is used, we look to source this responsibly and want to align with the Good Cashmere Standards.

2.3.4 SHELL & MOTHER OF PEARL

- Mother of pearl does not come from shellfish that are part of the food industry; therefore, this is not to be used in any format, whether for buttons, inlay, or other purposes.
- Any supplier found to be substituting fake for real shell will be in breach of contract and may be subject to cancellation of any outstanding orders and removal from our supplier list.

2.3.5 BONE & ANTLER

- Bone may be used where suppliers can provide evidence that this comes from the food industry as a by-product and where internationally accepted standards of good husbandry are practised.
- Ivory is completely banned, as also required by law.

2.3.6 ANIMAL TESTING

- N Brown does not support animal testing.
- All chemicals used in our products, including dyestuffs, perfumes and cosmetics must not be tested on animals and should not derive from animals, e.g. cochineal.

2.4 MATERIAL SPECIFIC CONSIDERATIONS:

The listed specification must be considered when using the following animal materials.

2.4.1 FEATHERS & DOWN

- N Brown currently accepts the use of feather and down from sources that can provide certification or declaration from Responsible Down Standard (RDS) or Traceable Down Standard (TDS).
- Feathers are only acceptable as a by-product of the meat industry and animals must be kept in conditions with good husbandry.
- Live plucking and force feeding are not acceptable.
- We do not accept any products that are a by-product from the foie gras industry.
- Peacock and other decorative feathers which are not by-products of food production are not acceptable under any circumstances.

2.4.2 LEATHER

- N Brown accepts leather only as a by-product of the meat industry.
- Suppliers may be required to provide details relating to animal welfare standards, tanneries and evidence of pollution controls including wastewater testing.
- We align with the standards set by the Leather Working Group and will require full supply chain transparency on request.

2.4.3 WOOL

- Wool must be sourced from producers that can demonstrate evidence of good animal husbandry in line with the five domains, including veterinary certifications or declarations where required.
- The use of merino wool, which involved mulesing is strictly prohibited. Mulesing is the removal of strips of wool-bearing skin from around the breech. This can be an extremely painful (at times fatal) process, as it is performed without pain relief, and although the procedure makes sheep less susceptible to fly strike it is a high alert animal welfare concern.
- We require the origin of wool on request and want to align with standards such as the Responsible Wool Standard (RWS) and others that are similar.

2.4.4 SILK

- N Brown encourages the use of alternatives to silk where possible, due to the silk product being based on the destruction of the silkworm lava cocoon and the death of the larvae, we review the use of silk on a case by case basis.

3.0 FORESTRY



Applies to our operations, packaging and textile procurements practices and covers our general standpoint regarding responsibly sourcing raw materials of forest origin and man-made cellulosic textiles.

N Brown Group stands in agreement with the priorities of Canopy’s Pack4Good and CanopyStyle Initiatives in their commitment to protecting the world’s forests and encouraging responsible sourcing of man-made cellulosic fibres such as rayon, viscose, lyocell and modal (MMCF) and paper-based packaging.

We believe that wood or forest derived materials used in our products should not originate from Ancient or Endangered Forests, or forest operations damaging high conservation values.

3.1 FORESTRY GOVERNING PRINCIPLES

We recognise the impact of logging and wood-based pulp production on forests, biodiversity, and the climate, and therefore aim to ensure the adoption of environmentally and socially responsible production practices.

This policy guides the Group's purchasing of paper products (packaging, office supplies etc.), home and furniture, commercial products using wood as a raw material and man-made cellulosic textiles made from dissolving pulp, with the goal of eliminating sourcing from:

- Ancient and Endangered Forests, including Indonesia's Rainforests, Coastal Temperate Rainforests of North America, Canada and Russia's Boreal Forests and Rainforests in Africa and South America (e.g. the Amazonian Rainforest)
- Forests logged illegally
- Tree plantations established through the conversion of natural forests since 1994
- Endangered species habitats
- Areas being logged in breach of First Nations and/or Indigenous people's collective community rights, including the right to Free, Prior and Informed Consent and the rights codified under the UN Guiding Principles on Business and Human Rights

Should we find that any of our product fibres are being sourced in this way, we will engage our supply chain partners to change practices and/or re-evaluate our relationship with them, with the potential for contract termination.

3.2 PAPER-BASED PACKAGING

N Brown believes in taking a holistic approach to our packaging, shifting away from single-use plastics, reducing packaging material waste, supporting circular packaging design solutions and material innovation, and enabling the conservation of Ancient and Endangered Forests. We are in favour of giving preference to paper-based packaging with high-recycled content, specifically post-consumer waste content.

3.3 MAN-MADE CELLULOSIC FIBRES

N Brown stands by protecting the world's forests through our approach to sourcing cellulosic fabrics, including rayon, lyocell, modal and other trademarked brands. We are in favour of the development of innovative processing techniques and fibre sources that reduce environmental impact and social impacts, such as closed-loop technology and recycled fibres.

3.3.1 N BROWN'S COMMITMENT TO CANOPYSTYLE

N Brown will only source from MMCF producers who are not actively sourcing from Ancient and Endangered Forests, or other controversial sources by the end of 2025. We will be opting for those who are ranked "Green Shirt" in Canopy's Hot Button Report.

The Hot Button Report provides each producer with a score. “Dark Green Shirt” will be assigned to producers with the highest score; such as those who are partaking in regular audits, conservation, innovation, adopting Forestry policies and promoting traceability and transparency. The report also considers leadership in Next Generation fibre solutions and engagement in ZDHC’s chemical management programmes.

Working with Canopy and our existing supplier base, N Brown will actively support collaborative and visionary solutions that protect remaining Ancient and Endangered Forests, eliminate sourcing from endangered species habitats and Ancient Endangered Forests by the end of 2025.

3.3.2 NEXT GENERATION SOLUTIONS

N Brown will actively support Next Generation solutions within packaging and MMCFs. This involves embracing closed-loop systems, progressing feedstocks for cellulosic recycling, and designing for circularity. Since 2023, we have a preference in place towards products with ‘Next Gen’ alternatives in alignment with Canopy. These systems aim to recycle most chemicals used during production and prevent the production process from negatively impacting human health and the environment.

3.3.3 CHEMICAL MANAGEMENT

Canopy’s Hot Button Report will now evaluate chemical recovery, wastewater and air emissions aligning with ZDHC guidelines from 2024.

3.3.4 RECOGNISING, RESPECTING AND UPHOLDING HUMAN RIGHTS AND THE RIGHTS OF COMMUNITIES

N Brown will request that our suppliers respect the Universal Declaration of Human Rights and acknowledge indigenous and rural communities legal, customary or user rights to their territories, land, and resources. We request that our suppliers acknowledge the rights of Indigenous People and rural communities to give or withhold their Free, Prior and Informed Consent (FPIC) before new logging rights are allocated or plantations are developed. We request that our suppliers resolve complaints and conflicts, and remediate human rights violations through a transparent, accountable, and agreeable dispute resolution processes.

3.3.5 N BROWN’S COMMITMENT TO PACK4GOOD

The reduction and reuse of paper and packaging is of paramount priority for the protection of world’s limited forest resources and has a clear and beneficial impact on reduced costs.

N Brown will prioritise the development of reduction and reuse strategy with targets and timelines for the next three years with the objective of eliminating materials from Ancient and Endangered Forests in all packaging sources by N Brown by the end of 2025.

Through partnering with Canopy in their Pack4Good initiative, N Brown will focus on these targets:

- Source or design re-usable/refillable shipping boxes to reduce corrugated paper and paperboard
- Design and implement e-commerce, shipping, display and wrapping systems that minimise the use of paper
- Utilise re-usable packaging systems for intra business applications
- Adopt the best practices and Next Generation Solutions including researching and applying emerging and circular economy technologies

3.4 FOREST CERTIFICATION

For all wood components (e.g. wood, bamboo, rattan) used in our operations, packaging, and products, as well as our man-made cellulosic fabrics, N Brown reserves the right to request an official certification by the Forest Stewardship Council (FSC) as proof that the wood comes from sustainably managed forests and plantations.

3.5 GREENHOUSE GAS FOOTPRINT

Recognising the importance of forests as carbon storehouses, we are in favour of initiatives that advance forest conservation to reduce the loss of high-carbon value forests, by encouraging suppliers to avoid harvest in these areas and by giving preference to those that use effective strategies to actively reduce their GHG footprint.

3.6 CONSERVATION OF ANCIENT AND ENDANGERED FORESTS

Ancient and Endangered Forests can be geographically located using maps of High Conservation Forests (HCVF), as defined by the Forest Stewardship Council (FSC), as well as maps of Intact Forest Landscapes (IFL), which can be paired with maps of other key ecological values like the habitat range of key endangered species and forest containing high concentrations of terrestrial carbon and High Carbon Stock Forests (HCS).

Suggested: 2.7 Product Compliance & Management

N Brown continuously monitors existing and future legislation across the UK, EU and rest of the world. We do not allow any timber materials to originate from Russia, and conduct requests with our own-branded furniture suppliers to ensure that timber continues to not be sourced from this region.

Definitions & Footnote provided by Canopy

- i) Ancient and Endangered Forests are defined as intact forest landscape mosaics, naturally rare forest types, forest types that have been made rare due to human activity, and/or other forests that are ecologically critical for the protection of biological diversity. Ecological components of endangered forests are: Intact Forest landscapes; Remnant forests and restoration cores; Landscape connectivity; Rare Forest types; Forests of high species richness; Forests containing high concentrations of rare and endangered species; Forests of high endemism; Core habitat for focal species; Forests exhibiting rare ecological and evolutionary phenomena. Key endangered forests globally are the Canadian and Russian Boreal Forests; Coastal Temperate Rainforests of British Columbia, Alaska and Chile; Tropical forests and peat lands of Indonesia, the Amazon and West Africa. For more information on the location and definitions of Ancient and Endangered Forests, please go to: <https://canopyplanet.org/tools/forestmapper/>
- ii) A good source to identify endangered, threatened and imperilled species is NatureServe's Conservation Status rankings for imperilled species that are at high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines in populations, or other factors.
- iii) Coastal temperate rainforests are rare and only ever covered 0.2% of the planet. On Vancouver Island only 10% of Vancouver Island's productive old growth rare coastal temperate rainforest remain. These stands of 1,000-year-old trees continue to be harvested despite their immense value to local communities for tourism. Their accessibility and beauty are a remarkable global asset and Canopy is working to see these last stands protected.

- iv) Conservation solutions are now finalized in the Great Bear Rainforest. On February 1st, 2016, the Government of British Columbia, First Nations, environmental organizations and the forest industry announced 38% protection in the Great Bear Rainforest and an ecosystem-based management approach that will see 85% of this region off limits to logging. Provided these agreements hold – sustainable sourcing has been accomplished in this ancient and endangered forest. We encourage ongoing verification of this through renewal of Forest Stewardship Council certification.
- v) Protection of Boreal Forests where the largest remaining tracts of forests are located worldwide is critical and dissolving pulp is becoming an increasing threat. Canada’s Boreal Forest contain the largest source of unfrozen freshwater worldwide and are part of the world’s largest terrestrial carbon sink – equivalent to 26 years worth of global fossil fuel use. Canopy is committed to working collaboratively on the establishment of new protected areas, the protection of endangered species and the implementation of sustainable harvesting in Canada’s Boreal Forest.
- vi) Indonesia experiences the second highest rate of deforestation among tropical countries, with the island of Sumatra standing out due to the intensive forest clearing that has resulted in the conversion of 70% of the island's forested area (FAO Forest Assessment 2010; Margono, B.A. et al. 2012). Canopy and our NGO partners are focused on forwarding lasting protection of the Leuser Ecosystem. Asia Pulp & Paper (APP) and Asia Pacific Resources International Ltd. (APRIL) have been identified as the primary cause and have been criticized by local and international groups for being implicated in deforesting important carbon rich peatlands, destroying the habitat for critically endangered species and traditional lands of indigenous communities, corruption, and human rights abuses (Eyes on the Forest. 2011. <http://www.eyesontheforest.or.id/>). APP and APRIL have both put in place forest policies, tracking implementation closely will be key to understanding if either company offers lasting solutions for Indonesia’s rainforests. Cellulosic fibre producer Sateri, is part of the Royal Golden Eagle Group along with APRIL.
- vii) <http://www.un.org/en/universal-declaration-human-rights/>
- viii) Plantations area areas that have been “established by planting or sowing using either alien or native species, often with few species, regular spacing and even ages, and which lack most of the principal characteristics and key elements of natural forests”. Plantations prior to 1994 are often FSC certified. Source FSC: <http://www.fsc.org/download.plantations.441.htm>
- ix) Agricultural Residues are residues left over from food production or other processes and using them maximizes the lifecycle of the fibre. Fibres used for paper products include cereal straws like wheat straw, rice straw, seed flax straw, corn stalks, sorghum stalks, sugar cane bagasse, and rye seed grass straw. Where the LCA (life cycle analysis) shows environmental benefits and conversion of forest land to on purpose crops is not an issue, kenaf can also be included here. Depending on how they are harvested, fibres for fabrics may include flax, soy, bagasse, and hemp. (Agricultural residues are not from on purpose crops that replace forest stands or food crops.)

4.0 RESPONSIBLE COTTON SOURCING



N Brown Group strives to use cotton from responsible sources and understands the risks associated with global cotton practises. Understanding the importance of sourcing cotton using ethical and sustainable practises supports the farmers and workers growing and preparing it, as well as the environment in which it grows.

We define less impactful cotton sources as Better Cotton (BCI), certified organic and recycled sources.

4.1 GOVERNING PRINCIPLES

Cotton is one of the most common raw materials used in textiles, with it being grown in over 80 countries and supporting the livelihood of over 350 million people. However, cotton production presents significant challenges when not produced according to responsible practices and is often associated with high social, environmental, and economic impacts.

The main sources of social risk are associated with cotton farming in high-risk regions such as the ones listed below. Other poor social practices include forced and child labour. Whereas the main sources of environmental risk are associated with irresponsible irrigation in water scarce regions; the use of synthetic chemical fertilisers and pesticides during cotton cultivation; water quality loss associated with the inappropriate and excessive use of pesticides and fertilisers; the degradation of soil fertility and organic carbon content and chemicals used during intermediate materials processing.

Approved suppliers, factory-sourced suppliers, licensees, and agents must:

- not source from textile mills in Xinjiang region of China or any other prohibited country,
- not manufacture in the Xinjiang region of China or any other prohibited country and, preferably use cotton sourced via a responsible cotton scheme including the following:
 - Better Cotton
 - Organic Cotton
 - Recycled Cotton

4.2 REQUIREMENTS

4.2.1 N BROWN REQUIRES THAT NO COTTON SHOULD BE KNOWINGLY SOURCED FROM THE XINJIANG UYGHUR REGION IN CHINA:

Xinjiang is a province in Western China and a region where a large percentage of Chinese cotton is farmed. There have been allegations of human rights breaches and forced labour in Xinjiang, impacting the Uyghur communities living in this region. Because of sustained allegations, N Brown Group condemns the sourcing of any cotton fibre grown in farms located in the province, following the 2020/21 growing season. This includes all cotton, including conventional cotton, BCI and organic. This position will remain until there is clear evidence of a change in the cotton industry's circumstances. N Brown suppliers MUST NOT wilfully use any cotton fibre or fabric sourced from Xinjiang province in our products. Failures to comply may constitute a breach of contract.

4.2.2 N BROWN REQUIRES THAT NO COTTON SHOULD BE KNOWINGLY SOURCED FROM TURKMENISTAN:

There are continuous concerns regarding the use of government-backed forced child labour during the cotton-picking season in Turkmenistan. In line with the industry and other UK retailers, N Brown Group has prohibited the use of both cotton fibre and fabrics from Turkmenistan in our products. This position will remain until there is clear evidence of a change in the cotton industry's circumstances. N Brown suppliers MUST NOT wilfully use any cotton fibre or fabric sourced from Turkmenistan in our products. Failures to comply may constitute a breach of contract.

4.3 PREFERENCES

We are committed to moving away from conventional methods of cotton farming and production, using preferred cotton fibre types we aim to reach 100% improved cotton options by the end of financial year 2026.

4.3.1 N BROWN PREFERS THAT COTTON IS SOURCED VIA A RESPONSIBLE COTTON SCHEME INCLUDING THE FOLLOWING:

Better Cotton

In 2021, N Brown became a member of the Better Cotton Initiative. Better Cotton (BC) is a not-for-profit organisation that works to make global cotton production safer and less impactful for the people who produce it and the environment it grows in. BC takes a [mass-balance approach](#) where ultimately to product may not physically contain Better Cotton. Since the start of FY27, we are transitioning our supply chain to become certified Mass balance and Physical, Traceable Better Cotton suppliers. As we transition through this process, we aim to also be certified to ensure traceability and a closed chain of custody.

Better Cotton is grown in a way that protects and restores the environment, while also improving farmers' livelihoods. BC Farmers receive training on the [Better Cotton Principles and Criteria](#) – one of six elements of the [Better Cotton Standard System](#).

More details: <https://bettercotton.org/>

Recycled Cotton

Recycled Cotton is produced from recycled materials and certified by a body such as Global Recycled Standard (GRS) or Recycled Claims Standard (RCS). These standards ensure any claims on recycled cotton can be verified through a chain of custody. N Brown require that recycled cotton contains at least 50% recycled content.

Organic Cotton

Organic cotton is produced and certified to organic agricultural standards such as Global Organic Textile Standard (GOTS) or Organic Content Standard (OCS).

Its production sustains the health of soils, ecosystems, and people by using natural processes rather than artificial inputs. Organic cotton practises also eliminate the use of toxic chemicals or GMOs (genetically modified organisms).

4.4 PROHIBITED COUNTRIES

N Brown condemns cotton in mass production from being sourced from the following prohibited countries/regions due to ongoing forced labour and human rights concerns:

- Afghanistan
- Central African Republic
- Democratic Republic of Congo
- Ethiopia
- Iran
- Iraq
- Libya
- Myanmar

- Nicaragua
- North Korea
- Somalia
- South Sudan
- Sudan
- Syria

- Tunisia
- Turkmenistan
- Uighur / Xinjiang Region (China)
- Yemen
- Zimbabwe



5.0 CHEMICAL MANAGEMENT

As outlined in our Environmental Protocol, N Brown is committed to reducing environmental and human health impacts, protecting workers, ensuring consumer safety, and maintaining full legal compliance across our global supply chain. This Chemical Management Policy aligns with recognised industry frameworks and defines the restricted and prohibited substances that are not permitted (or are limited) in both production processes and finished products.

Our objective is to comply with all applicable chemical regulations and significantly minimise the presence of hazardous or concerning substances. This approach covers all regions where our products are manufactured, sold, used, disposed of, or recycled. The policy applies to all suppliers, manufacturers, agents, and sourcing operations, and strict adherence to all requirements is mandatory.

The Chemical Management Policy applies to all categories supplied to N Brown, including apparel, footwear, accessories, home textiles, hard goods, packaging, and labelling. To support safe and responsible chemical management, we work with nominated test house Hohenstein and Bureau Veritas for responsible denim processing. These partnerships support continual improvement and help reduce the textile industry's chemical footprint.

The policy is informed by the following:

- **Current legislation:** All relevant laws and regulatory obligations regarding chemical safety.
- **Anticipated regulation:** Upcoming or pending requirements that may affect compliance.
- **Industry standards:** Accepted RSLs and MRSLs, including AFIRM, OEKO-TEX, and REACH.
- **Chemicals of concern:** Substances identified by NGOs, scientific bodies, and industry experts due to potential adverse impacts.

5.1 COMPLIANCE

It is a criminal offence to supply products to N Brown that do not comply with REACH legislation. All suppliers must exercise due diligence across the entire supply chain to ensure legal compliance. Requirements and consequences for non-compliance are outlined in the N Brown Supplier Charter and may include cancellation of future deliveries, product withdrawal, recall, financial deductions for lost profits, and termination of the business relationship.

Suppliers are responsible for ensuring all products comply with the N Brown Chemical Management Policy and Restricted Substances List (RSL). Compliance must be demonstrated through valid third party test reports.

Chemical compliance applies to all components used in product manufacturing, including (but not limited to): fabrics, dyes, prints, trims, fastenings, adhesives, solvents, coatings, paints, and lacquers.

Additional testing may be required for specific materials or chemical applications not fully addressed within the general testing programme. These will be requested by the assigned Product Technologist.

5.2 TESTING

Suppliers with whom we have a transactional relationship will need to complete a Product Compliance Document (PCD) for each style which includes a full bill of materials (BOM) and a compliance declaration.

A copy of the PCD can be found in the product workbooks, this must be completed by the supplier, who is responsible for all aspects of the products compliance. N Brown Product Technologist will review your PCDs and may select products for restricted substances testing. This must be arranged and paid for by the supplier.

PLEASE NOTE – Products cannot be given the final seal of approval until the PCD is received and all bulk test reports have been confirmed as being compliant. Products must not be shipped before satisfactory test results are obtained.

- Base test reports must be submitted with any new fabrics selected.
- Chemical Management PCD documentation must be submitted at the sealing stage.
- Bulk test reports must be submitted by the supplier at bulk stage, products cannot be given the final seal of approval until the test report has been confirmed as being compliant.

To guarantee ongoing compliance, N Brown conducts random, unannounced Due Diligence testing of products. Non-compliance may result in liquidated damages charged to the supplier, and we reserve the right to return the product at the supplier's cost.

5.3 N BROWN RESTRICTED SUBSTANCE LIST & RISK MATRIX

N Brown Group's Restricted Substances List (RSL) is an annually updated inventory of chemicals that are prohibited or restricted in both our production processes and final products. It defines allowable limits for hazardous chemical residues, ensuring compliance with chemical regulations across the UK, EU, and other global markets.

While the RSL may not include every potentially harmful substance, all N Brown products must be free from any chemicals that may pose a risk to consumer health, workers, or the environment.

N Brown aligns with and refers to the AFIRM RSL, one of the most comprehensive and widely recognised industry standards, to ensure best-in-class chemical safety across our supply base.

The Risk Matrix

To help anticipate where harmful chemicals may occur in materials or during production, N Brown employs a risk-based approach. Materials are categorised using an industry-informed risk matrix that reflects where restricted substances have historically been used or found as contaminants.

The Testing Matrix uses the following colour-coded system:

- **Red – High risk:** Testing required
- **Orange – Medium/Lower risk:** Testing recommended and may be required at brand discretion
- **Blank – Low/No expected risk:** Substance not anticipated in the material

For composite or multi-material products, suppliers must refer to the guidance for each individual component to ensure full compliance.

Facility Risk Considerations

Chemical risk is influenced not only by materials but also by the capability of the wet processing facility. The following must be considered:

- New, unverified, or inexperienced wet processing units are considered higher risk
- Facilities with a history of non-compliance or inconsistent performance must be treated as high risk
- High-risk facilities may require increased testing, documentation, or third-party verification

Suppliers are expected to assess their own facilities and upstream partners to ensure competent chemical handling, storage, and discharge management.

Use of the Risk Matrix

The Risk Matrix provides guidance only and may vary depending on the specifics of each supply chain. It must therefore be supported by:

- Compliance checks
- Third-party chemical testing
- Due Diligence testing
- Review of chemicals of concern flagged by industry or regulatory bodies

These steps ensure that all products meet N Brown's chemical safety standards and regulatory requirements.

Note that the information provided in the Testing Matrix is for guidance only and may vary depending on the specific supply chain. Therefore, its use should be supplemented by compliance checks and due diligence testing for chemicals of concern to ensure product safety and regulatory compliance.

We require our suppliers to adhere to the criteria and guidelines established by recognised industry standard.

5.5 MANUFACTURING RESTRICTED SUBSTANCES LIST (MRSL)

Our RSL applies to the chemical limits of the finished product and the chemicals our customers are exposed to. The MRSLs (Manufacturing Restricted Substances List) apply to the in-put and out-put chemicals used in the manufacturing process of textile materials, leather, rubber, foam, adhesives and trims used in textiles, apparel, and footwear industry:

- The input chemicals are the chemical formulations and substances used during the processing and product assembly which the workers are exposed to
- The output chemicals are the chemicals which are discharged into the environment

In FY25, N Brown aligned its MRSL (Manufacturing Restricted Substances List) to the OEKO-TEX® ECO PASSPORT.

5.5.1 WHAT IS THE OEKO-TEX® ECO PASSPORT?

Chemicals, colourants and auxiliaries that meet the OEKO-TEX® ECO PASSPORT standard have been tested and analysed against strict criteria, for a lower environmental impact. Deploying greener chemistry, your company supports cleaner, safer textile and leather products and production.

The ECO PASSPORT is compliant with global regulations, including annexes XVII and XIV of the REACH directive, CPSIA and the ECHA-SVHC candidate list. Certification recognition by ZDHC from Level 1 to Level 3. ECO PASSPORT-certified chemicals can be listed in the OEKO-TEX® Buying Guide, ZDHC Gateway and GoBlu B Hive App. ECO PASSPORT is recognised as a pre-certification for other OEKO-TEX® certifications: STeP, STANDARD 100, ORGANIC COTTON and LEATHER STANDARD.

For more information on the OEKO-TEX® ECO PASSPORT, you can head to the following links:

[https://www.oeko-tex.com/importedmedia/downloadfiles/OEKO-TEX ECO PASSPORT Standard EN DE.pdf](https://www.oeko-tex.com/importedmedia/downloadfiles/OEKO-TEX_ECO_PASSPORT_Standard_EN_DE.pdf)

OEKO-TEX® continually update their ECO PASSPORT (MRSL's) and there is no guarantee that the ECO PASSPORT will always be updated at the same time as this policy.

Policy Owner	Vicki Hassan
Role	Head of Sourcing, Fit & Sustainability
Published	June 2026
Reviewed	Annually
Next Review Date	June 2027