Responsible Sourcing Policy

November 2024






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:

- **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.

TRANSPARENCY AND 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 are sourced. Transparency enables us to understand our supply chain better, assess risks, and measure the impact of our sourcing practices across various regions.

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

Suppliers must be able to provide detailed information on the origin of materials, such as cotton, and maintain traceability through every stage of the chain of custody. Failure or refusal to provide such information may harm business relationships. It could lead to further actions, including but not limited to, rejection of products, or the return of goods to the manufacturer at the supplier's expense.

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

N Brown Group suppliers are also responsible for ensuring that 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.

1.0 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).

1.1 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 *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

1.2 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 or mohair
- 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.
- Product's composition should be accurately and clearly labelled. We will test products to ensure they are compliant with regulations and our RSP.
- Share this policy with their supply network.

1.3 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.

1.3.1 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

1.3.2 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

1.3.4 SHELL

- 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

1.3.5 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

1.3.6 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

1.4 MATERIAL SPECIFIC CONSIDERATIONS:

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

1.4.1 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 is 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

1.4.2 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

1.4.3 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

1.4.4 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
- Our stance may evolve if more responsible sources of silk are made available

1.4.5 CASHMERE

- Where cashmere is used we look to source this responsibly and aim to align with the guidelines set within the Good Cashmere Standards

2.0 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.

2.1 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.

2.2 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.

2.3 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.

2.3.1 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.

2.3.2 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.

2.3.3 CHEMICAL MANAGEMENT

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

2.3.4 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.

2.3.5 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

2.4 FOREST CERTIFICATION

For all our wood components (e.g. wood, bamboo, rattan) used in our operations, packaging, and products, as well as our man-made cellulosic fabrics, N Brown prefers and 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.

2.5 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 greenhouse gas footprint.

2.6 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).

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.)

3.0 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.

Our aim is to source 100% of our cotton from less impactful sources by **FY26**, including Better Cotton, organic and recycled sources.

3.1 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

3.2 REQUIREMENTS

3.2.1 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.

3.2.2 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.

3.3 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.

3.3.1 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.

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 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).

3.4 PROHIBITED COUNTRIES

N Brown condemns cotton in mass production from being sourced from the following prohibited countries/ regions:

- 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

This is due to ongoing forced labour and human rights concerns.

4.0 CHEMICAL MANAGEMENT

As outlined in our Environmental Protocol, N Brown is committed to reducing the impact of activities on the environment and people, protecting workers, and consumer health, and ensuring products are within legal limits and safe. This Chemical Management Policy encompasses a list of restricted or prohibited substances that are forbidden and limited in their use in both production and the finished products we sell.

Our goal is to adhere to strict legal requirements and minimise the presence of concerning chemicals, which encompasses countries beyond our sales region, where products are made, used, disposed of, and potentially recycled. This policy applies universally to all suppliers, including manufacturers, agents, and sourcing operations. Strict adherence to the policy, guidance and standards is mandatory.

The Chemical Management Policy encompasses a wide range of items, such as apparel, footwear, accessories, home textiles, hard goods, packaging, and labelling. In our pursuit of safe chemical management, we collaborate with industry partners such as Bureau Veritas, Hohenstein, and Jeanologia. These partnerships aid continual improvement in our chemical management approach and reduce the textile industry's chemical footprint.

The N Brown Chemical Management Policy is developed based on various factors, including:

- Current legislation: We closely follow existing laws and regulations regarding chemical usage and safety.
- Pending or anticipated regulation: We proactively consider upcoming regulations to stay ahead of compliance requirements.
- Industry-accepted RSLs & Authorisation Lists: We refer to recognised RSLs and MRSLs, such as the Apparel & Footwear International RSL Management Group (AFIRM), OEKO-TEX and REACH regulation for industry best practices.
- Chemicals of specific concern: We consider chemicals that have been flagged by NGOs, pressure groups, or scientific research as being of concern due to their potential adverse impacts.

4.1 COMPLIANCE

It is a criminal offence to supply products to N Brown that fail to comply with REACH legislation. The entire supply chain is required to exercise due diligence and take all reasonable precautions to avoid any legal violations. Non-compliance with the N Brown Chemical Management, including failure to meet legal requirements, is specified within the Supplier Charter. This may include actions such as the cancellation of future deliveries, withdrawal of products from the market, recall, debit for lost profits, and termination of the existing business relationship. Suppliers are responsible for complying with the N Brown Chemical Management and the Restricted Substances List (RSL) for all products. Suppliers will be held accountable for any failure to do so. Compliance must be demonstrated through a third-party test report or an OEKO-TEX certificate.

Chemical compliance must be demonstrated for all components used in the production of products, including fabrics, dyes, prints, components, trims, adhesives, solvents, paints, and lacquers. This compliance applies to all materials used during bulk production and product assembly. In some cases, additional testing may be required for specific products that are not fully covered under the RSP. These additional tests may be requested by the assigned technologist.

4.2 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. N Brown Product Technologist will review your PCDs and determine which components and/or products will be selected 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.

4.3 N BROWN RESTRICTED SUBSTANCE LIST & RISK MATRIX

N Brown Group's Restricted Substances List (RSL) is an annually updated, comprehensive inventory of chemicals, specifying both prohibited and restricted substances with their usage limits. This list sets the allowable levels of hazardous chemical residues in our final products, ensuring compliance with chemical regulations across the UK, EU, and other global markets.

While the RSL may not list every potentially harmful chemical, all N Brown products are expected to be free from any such substances.

The Risk Matrix Assessment Table guides the likelihood of restricted substances being present in various fibres and materials used in apparel and footwear. This tool supports sourcing and pre-production discussions with wet processing facilities to identify and eliminate key risk chemicals.

Risk categories, indicated by colours, are assigned based on industry knowledge about the presence of restricted substances in different materials. These categories help in identifying where substances have historically been used or found as contaminants in various materials. For compound materials, suppliers should refer to specific guidance for each material type to ensure compliance.

The Risk table categories are as follows:

- **Red**: High risk - Widely used & frequently detected, testing required
- **Yellow**: Medium Risk - Detected Occasionally, recommended for testing
- **Green**: Low Risk - Seldom Detected, testing not required
- White: No Risk - Never Detected

In assessing risk, it is crucial to consider the competence and experience of the wet processing facility in managing chemicals. New facilities or those with a history of non-compliance should be considered high risk and subjected to increased testing.

Note that the information provided in the RSL and Risk 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.

Our goal is to ensure that all products comply with relevant regulations and laws concerning the use of hazardous chemicals and substances. We require our suppliers to adhere to the criteria and guidelines established by recognised industry standards.

Test Parameters	Regulation	Test method	N Brown Maximum allowable limit	Leather	Plastic *including laminated paper, rubber or synthetic leather	Textile		Coating	Metal	Wood	Paper	Glass / ceramic	Desiccant	Others	Package / Packaging materials	Comment
						Synthetic	Natural									
Alkyl Phenol Ethoxylates (APEO)	**REACH ANNEX XVII (Entry 46 and 46a)** https://echa.europa.eu/documents/46	- Leather ISO 18218-1:2023 - Textile EN ISO18254-1:2016, -2:2019	≤100 mg/kg	**Medium risk**	Low risk	**Medium risk**	**Medium risk**	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	APEO`s are harmful to aquatic species. Used in concentrated forms as detergents and as a minor component in wetting agents and emulsifying agents. - Wool and leather products highest risk.
Allergeneous and Carcinogenic Disperse Dyes	**REACH ANNEX XVII (Entry 72)** https://eur-lex.europa.eu/legal-content/72 LFGB section 64 Common market restriction	- DIN 54231:2022	<50mg/kg each dye	No risk	No risk	**Medium risk**	No risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	- Some disperse dyes are known skin irritants, some are carcinogenic**.** Restricted disperse dyes are generally found in polyester – darker/stronger colours are more likely to fail. Don't test white or pastels
Aryl Amine salts	**REACH ANNEX XVII (Entry 72)** https://eur-lex.europa.eu/legal-content/72	EN 14362-1:2017	20 mg/kg	Medium risk	No risk	Medium risk	Medium risk	Medium risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	Classified as CMR`s. Comments as Azo dyes.
Authorisation list substances.	**REACH Annex XIV.** https://echa.europa.eu/authorisation-list	Various, depends on listed substance.	Substances on this list are **prohibited** in N Brown products after their respective "sunset date".	See ECHA Authorisation list for up-to-date listing. All listed substances cannot be used in N Brown products												Applies to all materials in products (including package and packaging).

Test Parameters	Regulation	Test method	N Brown Maximum allowable limit	Leather	Plastic *including laminated paper, rubber or synthetic leather	Textile		Coating	Metal	Wood	Paper	Glass / ceramic	Desiccant	Others	Package / Packaging materials	Comment
						Synthetic	Natural									
Azo dyes (prolonged and direct skin contact)	**REACH ANNEX XVII (Entry 43)** https://echa.europa.eu/documents/43	-Textile EN ISO 14362-1:2017 - Leather EN ISO 17234-1:2020 4-aminoazobenzene confirmation - Textile EN ISO 14362 -3:2017 - Leather EN ISO 17234-2:2011	Textiles ≤ 20 mg/kg (each listed amine) Leather ≤ 30 mg/kg (each listed amine)	Medium risk	No risk	Medium risk	Medium risk	Medium risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	- Certain azo dyes may breakdown to for carcinogenic compounds. Found on leathers and textiles. - Textiles - mainly used for dyeing cellulosic fibres. Darker, stronger colours are the highest risk
Bisphenol A (BPA)	**Austria National Gazette II No. 327/2011** **REACH ANNEX XVII (Entry 66)** **EU Reg 10/2011** **Prop 65**	- Solvent extraction / LC-MS	1mg/kg	No risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	BPA is a hormone disrupting chemical. It is used in the manufacture of Epoxy resins, polycarbonate and a number of other materials. It is likely to be present in polycarbonate items such as sunglasses but is only restricted in items that come into contact with food or drink

Cadmium (Total)	**REACH ANNEX XVII (Entry 23)** https://echa.europa.eu/documents/23 **Restricted globally**	- Plastic & paint: EN 1122 Method B - Metal: Acid digestion / AAS	Plastic & metal: < 0.01% (100mg/kg)(Kids 40mg/kg) Paint on painted articles: < 0.03% (300mg/kg) Paint (raw paint): prohibited	No risk	**High risk**	No risk	No risk	Medium risk	**High risk**	No risk	No risk	No risk	No risk	No risk	No risk	Extremely toxic. Suspected carcinogen. Used in metal and plastic components. Metal: Jewellery especially filigree style. Pigments based on cadmium can be found in plastics, paints, coatings and pigment prints
Chlorinated Organic Carriers (COC)	**REACH ANNEX XVII (Entry 72)** https://eur-lex.europa.eu/legal-content/72	EN 17137:2018	α,α,α, 4-tetrachlorotoluene α,α,α,-trichlorortolune α-chlorotoluene each <1 mg/kg	Low risk	No risk	Low risk	No risk	Low risk	No risk	No risk	Low risk	No risk	No risk	No risk	No risk	
Chromium (VI)	**REACH ANNEX XVII (Entry 47)** https://echa.europa.eu/documents/47 **Restricted globally**	- ISO 17075-1:2017 and ISO 17075-2:2017 for confirmation in case of interferences (with aging test) After ageing 80° and 5% Relative humidity for 24 hrs	≤ 3 mg/kg	High risk	No risk	No risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	Cr VI is a known skin irritant and caecinogen. Chromium is used in the chromophore of pre-metallised dyes (for wool and nylon), in some dye fixatives (for wool) and for and leather tanning. after aging test promotes CrVI formation - worst case scenario
Dimethyl Fumarate (DMFu)	**REACH ANNEX XVII (Entry 61)** https://echa.europa.eu/documents/61 **Restricted globally**	Textiles: EN17130:2019 All other materials: ISO 16186:2021	≤ 0.1 mg/kg	Low risk	No risk	Low risk	Low risk	No risk	No risk	Low risk	No risk	No risk	Low risk	No risk	No risk	-Severe skin irritant. Used as a preservative to stop good spoiling during transport and storage. often used in sachets or added to silica gel sachets Leather products are main risk.

Test Parameters	Regulation	Test method		Leather		Textile	Coating	Metal	Wood	Paper		Desiccant	Others		Comment

			N Brown Maximum allowable limit		Plastic *including laminated paper, rubber or synthetic leather	Synthetic	Natural					Glass / ceramic			Package / Packaging materials	
Extractable Heavy Metals	**REACH ANNEX XVII (Entry 72)** https://eur-lex.europa.eu/legal-content/72 China GB 25038:2010	EN 16711-2:2016 For China: GB/T 17593.2	≤ 1 mg/kg lead ≤ 0.1 mg/kg cadmium ≤ 1 mg/kg arenic ≤ 1 mg/kg chromium vi	Low risk	Low risk	Low risk	Low risk	Low risk	Low risk	No risk	No risk	No risk	No risk	No risk	Low risk	- Heavy metals in rubber shoes -applies to textile, synthetic leather and artificial leather components of shoe
Flame retardants (Only applicable if flame retardant finish applied)	**Restricted Globally**. Substances of concern: 1)PBB, TRIS, TEPA, TCEP, TDCPP, Penta BDE, Octa BDE, Decca BDE. 2) Tetra BDE, HexaBDE, Hepta BDE. 3) Antimony trioxide, SCCP`s, TBB, TBBPA, TBPH, TCPP. 4) HBCDD	EN ISO 17881-1:2016 (Brominated fire retardants), EN ISO 17881-2:2016 (Phosphorus flame retardants).	1) All prohibited 2) Each substance <10 mg/kg 3)Each substance <1000 mg/kg 4) <100 mg/kg	Low risk	Low risk	Low risk	Low risk	Low risk	No risk	Low risk	Low risk	No risk	No risk	Low risk	No risk	- Potential health and environmental concerns. Flame retardants are unlikely to be found in anything other than materials that are specified as having to meet flammability standards. Some flame retardant chemicals (such as SCCP's) are multi-functional so can be found in materials where they are 'doing a different job' – such as being a plasticiser.

Formaldehyde	**REACH ANNEX XVII (Entry 72)** https://eur-lex.europa.eu/legal-content/72	Textiles: ISO 14184-1:2011 Leather: ISO 17226-1: 2021 (HPLC method), ISO 17226-2: 2019 (UV method)	**Babies (0-36 months)** ≤16 mg/kg **Direct contact with skin (>36 months)** ≤75 mg/kg **Indirect skin contact (>36 months)** ≤300mg/kg **Footwear** ≤75mg/kg	Low risk	No risk	Medium risk	Medium risk	Medium risk	No risk	Low risk	No risk	No risk	No risk	Low risk	No risk	Known irritant and classified as a carcinogen -Commonly found in easy care, non-iron and anti-pill resins applied to textiles - Stiffener in mesh fabrics - high risk - Adhesives (other) - May be used for prints on textiles and in mock leather
Heavy Metals (Total): Arsenic & Mercury (for Cadmium & Lead see separate entries)	**Restricted globally**	Acid Digestion, ICP-OES / ICP-MS	Arsenic <100 mg/kg Mercury <0.5 mg/kg	No risk	No risk	No risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	Arsenic and lead are extremely toxic. Arsenic and its compounds can be used in preservatives, pesticides and defoliants for cotton. Traces can be found synthetic fibres, paints, inks, trims and plastics. Mercury can be present in caustic soda made using the mercury cell process. Organomercury compounds are restricted in some countries.
Lead (Total)	**REACH ANNEX XVII (Entry 63)** https://echa.europa.eu/documents/63 Restricted globally.	Jewellery: EPA 3050B / 3051A / 3052 Non-jewellery: Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Surface coating: CPSC-CH-E1003-09.1	Surface coating: 90 mg/kg; Accessible substrate: 90 mg/kg (bag); 100 mg/kg (others) Accessible substrate with PVC: 200 mg/kg	No risk	High risk	Low risk	Low risk	High risk	High risk	No risk	No risk	Low risk	No risk	No risk	No risk	Lead is extremely toxic. Lead catalysts used to synthesize paint, plastic, pigment inks and coatings may contain lead. As a result, traces of lead compounds may remain in the finished product. -Mainly found in garment embelishments - large number of exemptions, see (EU) 2015/628 (e.g. crystal glass)

Lead (Release)	**REACH ANNEX XVII (Entry 63)** https://echa.europa.eu/documents/63	EN 16711-3:2019 (if total lead exceeds 500 mg/kg)	≤ 0.05µg/g/hour	No risk	High risk	Low risk	Low risk	High risk	High risk	No risk	No risk	Low risk	No risk	No risk	No risk	As Lead (Total). Coated articles are exempt from restriction if release rate is below limit.
Nickel release	**REACH ANNEX XVII (Entry 27)** https://echa.europa.eu/documents/27	- **Non-spectacle:** Coated item (EN 12472: 2020 and EN 1811-:2023 - Non-coated item (EN 1811-2023) - **Spectacle:** Coated item (EN 12472: 2020 and EN 16128:2015) - Non-coated item (EN 16128:2015)	≤ 0.5 µg/cm2/week (non-body piercing) ≤ 0.2 µg/cm2/week (body piercing)	No risk	No risk	No risk	No risk	No risk	High risk	No risk	No risk	No risk	No risk	No risk	No risk	Nickel is a strong skin sensitizer. In metal components, nickel can migrate to the surface of the metal causing skin irritation or high levels of skin allergy in some consumers, particularly in prolonged skin contact -Mainly found in garment metal components /accessories or jewellery

Test Parameters	Regulation	Test method	N Brown Maximum allowable limit	Leather	Plastic *including laminated paper, rubber or synthetic leather	Textile		Coating	Metal	Wood	Paper	Glass / ceramic	Desiccant	Others	Package / Packaging materials	Comment
						Synthetics	Natural									
N-nitrosamine content & N-nitrosatable substances (See list below)	**China: GB 25038-2010** Restricted in rubber components of footwear	- GB/T 24153	0.5mg/kg each substance	No risk	Medium risk			No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	- Nitrosamines can be formed during the production of rubber. N-nitrosamines are carcinogens Risk is only to rubber

Organotins	**REACH ANNEX XVII (Entry 20)** https://echa.europa.eu/documents/20	ISO/TS16179: 2012	≤ 0.1% (1000mg/kg) (Tri-substituted Organostannic Compounds) ≤ 0.1%(1000mg/kg) (Dibutyltin (DBT) Compounds) ≤ 0.1% (1000mg/kg) (Di-octyltin (DOT) Compounds)	**No risk**	Low risk	Low risk	Low risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	-Organotins are very toxic. Organotins are sometimes used as biocides in formulations and on materials to stop them spoiling. They are also used as catalysts for chemical synthesis and as stabilisers for PVC. In textiles organotins are associated with plastics/rubber, inks, paint, metallic glitter, PU and heat transfer material. - Foil prints are a risk - **Check if antibacterial treatment used**
PAHs **Polycyclic aromatic hydrocarbons**	**REACH ANNEX XVII (Entry 50 & 72)** https://echa.europa.eu/documents/50 https://echa.europa.eu/documents/10162/8db10905-d535-0a04-0af5-7628a210dc28 **Germany: Germany GS mark** **Common market restriction.**	- AfPS GS 2019:01 PAK. GC-MS analysis.	Sum of 18 PAHs: 10 mg/kg (Childcare articles <5mg/kg) BaP, BeP, BaA, CHR, BbF, BjF, BkF, DBA, IPY, BPE : <0.5 mg/kg (each)(Childcare articles <0.2mg/kg) NAP: <1 mg/kg	No risk	High risk	Low risk	Low risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	- PAH's are carcinogens. PAH's can be found in black pigments and various oils that can be added to plastics and rubbers and coatings. - Rubbers/neoprene main concern, black colour high risk
Pentachlorophenol (PCP) **and its salts and esters.** **TeCP**	**EU 2019/1021 and its amendments**	all materials EN 17134-2:2023	Not Allowed (<5 mg/kg)	Low risk	No risk	No risk	Low risk	Low risk	No risk	Low risk	Low risk	No risk	No risk	No risk	No risk	They are toxic and harmful to the environment PCP's are used as pesticides and also as preserving agents for textiles and leather. They can be found in textiles (mainly unwashed/processed) and in leather.

All PFAS as measured by total fluorine (for US)	**California AB 1817**	EN 14582:2016 or ASTM D7359:2023	100 mg/kg	High risk	No risk	High risk	High risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	These fluorocarbons are used for clothing and footwear to provide water/stain resistant properties.
Perflouroctaoic acid (PFOA), its salts and related substances (Only applicable if water or stain repellant finish applied)	**Regulation EU 2019/1021 and its amendments**	EN ISO 23702-1:2023 EN 17681-1: 2022 EN 17681-2: 2022	Not Allowed PFOA & its salts. 25 ppb PFOA related substances: 1000 ppb	High risk	No risk	High risk	High risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	PFOA is persistent and bioaccumulative PFOA is a by-product of the manufacture of 'C8' fluorocarbons made by the 'telemerisation' process and can be present at trace levels in formulations. These fluorocarbons are used for clothing and footwear and residues of PFOA can be present. There has been a general shift to shorter chain 'C6' fluorocarbons but these can still contain traces of PFOA. -PTFE tape
Perflouroctane Sulfonate (PFOS) & related substances (Only applicable if water or stain repellant finish applied)	**Regulation EU 2019/1021 and its amendments**	EN ISO 23702-1: 2023 EN 17681-1: 2022 EN 17681-2: 2022	Not Allowed (1 µg/m²)	High risk	No risk	High risk	High risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	PFOS is persistent bioaccumulative and is known to be harmful - Main Textile areas are coated textiles, with stain / water resist claim

C9-C14 PFCAs **(Only applicable if water or stain repellant finish applied)**	**REACH ANNEX XVII (Entry 68)**	EN ISO 23702-1: 2023 EN 17681-1: 2022 EN 17681-2: 2022	C9-C14 PFAS & salts: 25 ppb C9-C14 PFAS related substances: 260 ppb	High risk	No risk	High risk	High risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	These fluorocarbons are used for clothing and footwear to provide water/stain resistant properties.
Perflourohexane sulfonic acid (PFHxS) & related substances (Only applicable if water or stain repellant finish applied)	**Regulation EU 2019/1021 and its amendments**	EN ISO 23702-1:2023 EN 17681-1: 2022 EN 17681-2: 2022	Not Allowed PFHxS & its salts. 25 ppb PFHxS related substances: 1000 ppb	High risk	No risk	High risk	High risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	These fluorocarbons are used for clothing and footwear to provide water/stain resistant properties.

Test Parameters	Regulation	Test method	N Brown Maximum allowable limit	Leather	Plastic *including laminated paper, rubber or synthetic leather	Textile		Coating	Metal	Wood	Paper	Glass / ceramic	Desiccant	Others	Package / Packaging materials	Comment
						Synthetic	Natural									
pH Value	**Common market restriction**	Textile: ISO 3071: 2020 Leather: ISO 4045: 2018	Textile: 4.0 - 7.5 Leather: 3.5 - 7.0 Chrome-tanned: 3,2 - 5,5	Low risk	No risk	Low risk	Low risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	Extremes of pH can cause skin irritation. There is a legal requirement for pH to be controlled in some countries All textiles and leather (includes mock leather) can have their pH influenced by wet processing conditions. Bleached or acid washed fabrics at highest risk.

Test Parameters	Regulation	Test method	N Brown Maximum allowable limit	Leather	Plastic *including laminated paper, rubber or synthetic leather	Textile		Coating	Metal	Wood	Paper	Glass / ceramic	Desiccant	Others	Package / Packaging materials	Comment
						Synthetic	Natural									
Phthalates	**REACH ANNEX XVII (Entry 51 (amended) and 52 & 72)** https://echa.europa.eu/documents/51 amended echa/ doc 72 https://echa.europa.eu/documents52	- CPSC-CH-C1001-09.4	500 mg/kg each Sum of all listed <1000 mg/kg (see table below for list)	No risk	High risk	Medium risk	No risk	High risk	No risk	No risk	No risk	No risk	No risk	Low risk	**Low risk**	Some phthalates are endocrine disruptors. There is increasing global legislation for phthalates. Some are illegal in toys, childcare items and children's products. Some are designated as Substances of Very High Concern (SVHC) in the EU and some may only be used in the EU if their use is authorised by the EU authorities. Phthalates are most commonly used as plasticisers in PVC and can be found at very high levels (up to 35%) in plastics, coatings, mock leather and pigment prints (plastisol). May also be found in glues (other).
Quinoline	**REACH ANNEX XVII (Entry 72)**	DIN 54231:~~2~~ 2022	50 mg/kg	No risk	No risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	Classified as a CMR Quinoline is used in the manufacture of dyes but primarily used to form other compounds. Considered as an environmental contaminant.

Short chain chlorinated paraffin C10-C13 (SCCP)	**EU 2019/1021 and its amendment** https://eur-lex.europa.eu/POP	**Leather: ISO 18219-1:2021** **Textiles: ISO 22818:2021**	< 1000 mg/kg	Medium risk	High risk	Low risk	No risk	Medium risk	No risk	No risk	No risk	No risk	No risk	No risk	Low risk	SCCP's are persistent organic pollutants (POP's) and are covered by legislation SCCP's are traditionally viewed as flame retardants but they can be used as plasticisers for PVC. Have been found in plastics, coatings and mock leathers.
Medium chain chlorinated paraffin C14-C17 (MCCP)	**REACH ANNEX XVII (proposed)**	**Leather: ISO 18219-2:2021** **Textiles: ISO 22818:2021**	< 1000 mg/kg	Medium risk	High risk	Low risk	No risk	Medium risk	No risk	No risk	No risk	No risk	No risk	No risk	Low risk	Similar to SCCP might be used as flame retardant and as fatting agent in leather.

Test Parameters	Regulation	Test method	N Brown Maximum allowable limit	Leather	Plastic *including laminated paper, rubber or synthetic leather	Textile		Coating	Metal	Wood	Paper	Glass / ceramic	Desiccant	Others	Package / Packaging materials	Comment
						Synthetic	Natural									
Solvents - Benzene	**REACH ANNEX XVII (Entry 72)** https://eur-lex.europa.eu/legal-content/72	Headspace GC/MS	≤5 mg/kg	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	Low risk	No risk	Classified as a CMR. Benzene might be used as solvent in primarily in adhesives and cleaning formulations.
Solvent - Dimethylformamide (DMFa)	**REACH ANNEX XVII (Entry 72)**	Textiles: EN 17131:2019 Other materials: DIN EN ISO 16189:2022	500 mg/kg	No risk	High risk	No risk	No risk	High risk	No risk	No risk	No risk	No risk	No risk	Low risk	No risk	Classified as a CMR & SVHC. DMFa commonly used in the manufacture of PU mock leather.
Solvent - Dimethylacetamide (DMAC)	**REACH ANNEX XVII (Entry 72)**	Textiles: EN 17131:2019 Other materials: DIN EN ISO 16189:2022	1000 mg/kg	No risk	Low risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	no risk	No risk	Classified as a CMR & SVHC. Might be used in production of elastane fibres..

Solvent - N-Methyl-2-pyrrolidone (NMP)	**REACH ANNEX XVII (Entry 72)**	Textiles: EN 17131:2019 Other materials: DIN EN ISO 16189:2022	1000 mg/kg	Low risk	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	no risk	No risk	Classified as a CMR & SVHC. NMP might be used as substitute for DMFa iin PUR production. Sometimes used in leather production.
SVHC on the current candidate list	**REACH Article 33** https://echa.europa.eu/candidate-list-table	Various depending on substance: - Solvent extraction / analysis by GC-MS and GC-ECD - Acid digestion / analysis by ICP-AES and/or ICP-MS	≤ 0.1% (1000mg/kg) per article for each of the SVHCs on the current candidate list	See ECHA Candidate list for up to date listing. Restricted to <0.1% W/W by N Brown												Applies to all materials in all component parts of products (including packaging). Some SVHC's are also restricted in this RSL and in other legislation at much lower levels than the 0.1% limit which triggers legal obligations
Vinyl Chloride Monomer (VCM) (China only) (PVC only)	China:GB21550-2008	GB/T 4615	≤ 0.5 mg/kg	No risk	Medium risk	No risk	No risk	Medium risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	VCM is highly toxic, flammable, and carcinogenic. The production of VCM has been recognised as a source of dioxins, dioxins are persistent environmental pollutants. VCM is a building block of PVC Restricted in China in PVC artificial leather.

Volatile substances (VOC`s) (China only) (PVC artificial leather)	China:GB21550-2008	GB 21550 Section 5.5	≤20g/m2	Low risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	No risk	Volatile organic compounds are associated with solvent-based processes like PU coatings and adhesives. They should not be used in textile chemical preparations. Restricted in China in PVC artificial leather.

4.5 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.

4.5.1 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 BHive 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

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	**Angela Gaskell**
Role	**Group Sourcing, Sustainability, Quality & Fit Director**
Published	**November 2024**
Reviewed	**Annually**
Next Review Date	**November 2025**