

COUNTRY ROAD GROUP

COUNTRY ROAD MIMCO TRENERY WITCHERY

ENVIRONMENTAL CODE OF PRACTICE FOR THE PRODUCTION OF GOODS SUPPLIED TO THE COUNTRY ROAD GROUP

OBJECTIVES

The objective of this code of practice as adopted by Country Road Group is to ensure that within existing technology, no materials, dyes or chemicals used in the production of garments, fabrics, leather and/or textile related products present an unacceptable risk to health or the environment during their manufacture, use or disposal.

Country Road Group has a long established reputation of conducting business in a manner which reflects its values. We therefore take our responsibilities to the environment & safety seriously. Together with our Vendors we will continue to seek out opportunities to achieve sustainable ongoing improvements. We will continue to update our Code of Practice on a regular basis, incorporating changes in legislation or new additions to the SVHC (Substances of very high concern) & the RSLs (Restricted substances lists) as documented in the European Reach program REACH is a European Community Regulation on chemicals and their safe use. It deals with the Registration, Evaluation, Authorisation and Restriction of Chemical substances.

REACH places greater responsibility on industry to manage the risks that chemicals may pose to the health and the environment.

RESPONSIBILITIES

In order to ensure that conformance to our requirements are met it is imperative that as a Supplier to Country Road Group you carry out due diligence checks on your own facilities and your third parties facilities.

Failure to comply this Code will result in an immediate removal of product from stores. The source of the failure is to be identified and the chemical eradicated from the supply chain.

The environment is everyone's responsibility and we ask that you discuss and action this code with your team and supply base. We would therefore encourage Vendors to be proactive in identifying potential problems and developing commercially viable solutions to them.

REQUIREMENTS

1) DYESTUFF SUPPLIERS

Preferably dyes supplied by ETAD (Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers) member companies should be used. A list of ETAD member companies can be found on the ETAD website at www.etad.com.

2) CHEMICALS ON GARMENTS/PRODUCT

The following chemicals must not be deliberately used and must not be present on final product at concentrations above those specified:-

Banned Azo Dyes	30 mg/kg 22 test items recommended	general requirement
Skin Sensitising Dyes	45 ppm	regulated in Germany LFGB

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APEO's	100 mg/kg	general requirement
Organo Tin Compounds (DBD, DOT)	0.1% by weight of Tin	general requirement
Tri-substituted Organostannic Compounds (TBT, TPhT, TCyT, TOT)	0.1% by weight of Tin	general requirement
Dimethyl Fumerate (DMF)	0.1 ppm	restricted from 15 March 2012
PCP	5 ppm 0.05 ppm	general requirement baby products up to 36 months
Mercury	0.02 ppm Extractable Mercury	general requirement
Moth-proofing	10 ppm	general requirement
PFOS	1 ppm	(limit under REACH is 1 µg/m ² for textile and coated materials)
PFOA	1 ppm	general requirement
Chlorinated Organic Carriers	1 ppm	general requirement
Chromium VI	3 ppm	regulated under REACH
Organic Solvents		no residual solvent on the end product
Biocidal Finishes	not permitted	general requirement
Flame Retardants	not permitted	PBB, TEPA, TRIS, PentaBDE and OctaBDE are regulated under REACH
Pesticides/Insecticides	0.5ppm	general requirement

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3) FORMALDEHYDE

Formaldehyde should not be used at any stage in the production of fabrics, yarns and garments, and, in particular infant & children's garments.

Testing should be carried out to ensure that regulated permissible levels of free formaldehyde are adhered to using test method ISO 14184-1: 2011. Permissible levels of free formaldehyde are:

16 mg/kg for baby, infant & children's garments
75 mg/kg for garments & textiles that have direct skin contact (includes bedlinen)

300 mg/kg for garments & textiles where there is no likely contact with the skin.

4) PHTHALATES (PVC PRODUCTS)

Phthalates are giving increasing concern as potential endocrine modulators and possible carcinogens.

The Commonwealth of Australia has introduced an interim ban on certain products for children and infants up to the age of 3 containing more than 1 per cent w/w of the chemical Diethylhexyl phthalate (DEHP) was published in a notice in *Special Gazette No. 19* on 2 March 2010.

Competition and Consumer Protection Act 2010 - Consumer Protection Notice No. 11 of 2011 declares that children and infant products with more than 1 per cent DEHP are unsafe goods.

<https://www.comlaw.gov.au/Details/F2011L00192>

The deliberate use of phthalates is not permitted in any childrenswear product. Under the REACH regulation, the following phthalates are regulated in Annex XVII of the REACH regulation:

Children's articles: DEHP+DBP+BBP+DIBP+DIHP+DHNUP+DnHP+DMEP+

DnPP+DIPP+NPIPP+DPP+DHP+DINP+DIDP+DNOP=0.1% (total)

Children's articles intended for use by a child that can be placed in the child's mouth:

DINP+DIDP+DNOP= 0.1% (Total)

5) SKIN IRRITATION

In order to minimise the risk of skin irritation, all fabrics, yarns and materials to be used in the manufacture of products should be finished to a pH range which is compatible to human skin. The acceptable range is normally between 4.5 and 7.5. For leather products pH acceptable range is between 3.5 and 7.5 .

The following items should be tested to comply within the limits stated within REACH regulations:

Total Cadmium	Plastic or metal in Jewelry	100 mg/kg
	Surfact coating paint	1000 mg/kg
	Paint	Not detected
Nickel Release	Direct, prolonged contact with skin	0.5 ug/cm ² /week
	Body piercing	0.2 ug/cm ² /week
Polycyclic Aromatic Hydrocarbons BaP, BeP, BaA, CHR, BbF, BkF, BkF, DBA	Toy or Childcare items (each)	0.5 mg/kg
	Other items (each)	1.0 mg/kg
Short Chain Chlorinated Paraffins	All Items	1000 mg/kg

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Total Lead Articles or components which may be placed in the mouth by children 500 mg/kg

6) FUTURE CHEMICALS OF CONCERN

There is a growing debate about the use of a number of chemicals that may harm human health and/ or the environment. Ultimately the use of some of these chemicals may be banned or restricted. We request that our suppliers anticipate which chemicals may be of concern and develop commercially viable alternatives to them.

Suppliers should review the REACH regulation on a regular basis to ensure that they work responsibly in recognising substances of very high concern (SVHC). The list of SVHC is called a Candidate List which contains the latest SVHC and can be found on the ECHA (European Chemical Agency) website:

The Candidate List can be found on the following weblink:

<http://echa.europa.eu/web/guest/candidate-list-table>

According to Article 33 of REACH Regulation (Regulation (EC) No. 1907/2006), producers, importers and other suppliers of articles containing SVHC on the Candidate List with a concentration above 0.1%(w/w) must provide information about the SVHC to Country Road Group.

7) PRODUCT SAFETY DATA SHEETS

All dyes or chemicals used must have an authentic safety data sheet from the supplier giving adequate warning of the health, safety and environmental hazards of the product and advice on appropriate measures for its safe storage, use and disposal.

8) STORAGE AND HANDLING OF DYES AND CHEMICALS

The handling of all chemicals must be made the subject of high standards of industrial hygiene and safe working practices, the objective being to prevent, or to reduce to an absolute minimum, the exposure of chemicals to the workforce and any associated health risks.

Exposure can occur through skin absorption, contact with the eyes, ingestion or inhalation.

Working procedures should be established to avoid exposure by all these routes. As far as possible, this should be achieved by engineering means such as containment and or effective ventilation, including the use of dust free or liquid products.

In all instances of possible risk, personal protective equipment, e.g. dust masks, eye protection, gloves, aprons, etc must be provided by the employer and properly used by the workforce.

All dyes and chemicals should be stored in areas which are kept clean, dry, cool and well ventilated. Suitable fire fighting equipment must be available and monitored regularly. Further guidance on the safe handling of dyes and chemicals is available from suppliers and local or national health and safety authorities.

Particular attention should be paid to ensuring that any chemical spill does not enter the environment.

9) WASTE WATER TREATMENT

Effluent from each textile wet processing facility should be treated prior to discharge to a receiving water system either on site or at an effluent treatment plant whose discharge content limits are regulated by a local and/or national governmental authority.

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10) ILLEGAL LOGGING

The Commonwealth of Australia – Department of Agriculture has introduced legislation designed to promote the trade in legally logged timber and timber products. Suppliers are expected to take steps to ensure that all products of wood origin are sourced responsibly from traceable sources.

Importers are required to submit customs declaration containing details of origin and for selected timber products and items of wood origin. Suppliers are required to provide documentation to verify the origin and species of timber and wood products.

Regulated timber and wood products are listed in the illegal Logging Prohibition Amendment Regulation 2013:

<http://www.agriculture.gov.au/forestry/policies/illegal-logging>

11) ENVIRONMENTAL MANAGEMENT SYSTEMS

All the foregoing requirements should naturally form part of an environmental impact review undertaken as part of a company's environmental management system. This may take the form of an informal internal system that is built into the operating procedures of the company. However, it is becoming increasingly important for companies who operate potentially polluting processes to be able to demonstrate a structured approach to environmental management and a commitment to environmental improvements. An appropriate way of achieving this is by accreditation to a formal, externally verified EMS Standard, such as ISO 14001.

In addition to all the above requirements, it is Country Road Group's policy and a requirement of its suppliers to continually seek out opportunities to help reduce the environmental impact by exploiting new technology and processing methods to help reduce waste and energy consumption whilst making efficient use of dyes and chemicals.

Each manufacturing operation in the supply chain is expected to conform to international and local legislation on health and safety in the workplace, and to comply with all locally applicable standards or requirements for solid, liquid and airborne emissions.

It is also the supplier's responsibility, together with its supply base, to ensure it is aware of and complies with all current and pending legislation relevant to its operation and activities and product end use.