

# HARMFUL SUBSTANCES POLICY & RESTRICTED SUBSTANCES LIST

#### Commitment

CAMILLA acknowledges our responsibility to reduce our environmental impact and supply safe and compliant products by eliminating harmful chemicals from our supply chain.

We require our suppliers to share our commitment toward chemical safety and obligations under international legislation. Suppliers are responsible for communicating these obligations, the Restricted Substances List and testing requirements to their subcontractors and input suppliers, including chemical providers.

#### **Restricted Substances List (RSL)**

Suppliers are responsible for ensuring the products they produce comply with the Restricted Substances List and keeping updated with international legislation and their developments.

The Restricted Substances List applies to all CAMILLA product and packaging including trims, shoes and accessories and outlines the maximum allowable limits of potentially harmful chemical substances found in finished products.

The RSL represents the regulations and legislation applicable to CAMILLA's trading destinations. At a minimum, all products and packaging must comply with the following regulations and legislation:

- REACH European Regulation No 1907/2006 including
  - Annex XIV (Substances of Very High Concern (SVHC)
  - o Annex XVII
- SVHC Candidate list for authorisation
- EU Biocide Product Regulation (BOR) No. 528/2012
- Stockholm Convention on Persistent Organic Pollutants (POPs)
- California Proposition 65
- EU Packaging Directive 94/62/EC



#### **Restricted Substances List:**

Please see the Attached Excel File 'CAMILLA RSL MATRIX' – Page "RSL" + "Annex" for a full list of restricted substances, which must not be present either at all, or in levels above those specified in the RSL table.

Please note, it is the responsibility of the supplier when sourcing fabric, trims, components to ensure that the final item chosen is complainant with International Standards.

## **Chemical management**

Suppliers must have a due diligence procedure in place to assess the risk of the presence of chemical residue based on production and chemical management processes, chemicals and dyes used, fibre and trim types.

The Risk Matrix is intended as a guide for this purpose so Suppliers can test product accordingly, however if Suppliers have concerns with additional areas of risk, tests should be carried out to ensure compliance with the Restricted Substances List.

#### **Risk matrix**

Please see tab "MATRIX". This provides a guide per region of what the regulations are with regards Chemical Testing Compliance.

Camilla provides product worldwide and for this reason fabric, trims and components must comply with these regulations.

Garment Tech & Production will specify what Chemical & Physical standards need to be tested for each product. When sourcing, it is the supplier responsibility to ensure that all items meet the minimum levels specified in the "Matrix" page of the document. If further tests for a specific region are required, these will be advised.

#### **Compliance**

CAMILLA reserves the right to request test certificates and or request proof that our products comply with international regulations and legislation at any time during production.

Suppliers agree to provide test reports and evidence of compliance as requested and to do so in a timely manner.



#### Nominated testing agency

Camilla has established EUROFINS as its nominated international testing agency. Please see the Eurofins contact list for local lab contacts and ensure testing requests indicate the tests are for CAMILLA AUSTRALIA

#### Preference for OEKO-TEX® for fabrics and trims

Our preference is for all fabric and trim articles to be certified according to STANDARD 100 by OEKO-TEX®. This includes raw yarn and fabrics and also trims including zips and buttons.

The STANDARD 100 by OEKO-TEX® certification is a third-party testing and certification system for textile raw, intermediate and end products at all stages of processing. It verifies if the item has been tested for harmful substances

Suppliers will be required to provide valid certificates demonstrating certification of Product Class I and II articles.

Certificates are valid for 12 months and will be verified against the OEKO-TEX® label check on the website <a href="https://www.oeko-tex.com/en/label-check">https://www.oeko-tex.com/en/label-check</a>

### **Manufacturing Restricted Substances List**

In addition to ensuring chemical residues are minimised and compliant with allowable limits, the use of hazardous chemicals in the processing stage must be progressively eliminated.

CAMILLA requires suppliers, including chemical and raw material suppliers to work towards the elimination of priority chemicals as defined by the Zero Discharge of Hazardous Chemicals (ZDHC) Manufacturing Restricted Substance List (MRSL) which can be found here: http://www.roadmaptozero.com/fileadmin/pdf/MRSL\_v1\_1.pdf

#### **Chemical failures**

If a test report fails, it must be immediately communicated to the buyer as early in the production process as possible to determine the next course of action. This may include further tests to assess or isolate the scope of the problem at the Supplier's expense or product or trim redevelopment.

Failure to alert CAMILLA to any failed tests or the provision of non-compliant products can result in order cancellations, financial compensation and penalties, pending the outcome of any proceedings.

Enforcement notifications and wholesale requests:

In the event that CAMILLA:

Receives notice that it has sold a product that does not comply with our RSL



- Carries out its own testing and determines a failure to comply with our RSL; or
- Receives a complaint from a customer or wholesale account:

Suppliers must immediately provide all product information and testing documentation and assist with investigations and enforcement authority or wholesale requests.

CAMILLA cannot accept products which fail to comply with our RSL and we reserve the right to:

- Reject or require replacements of failed products
- Request re-development in compliance with our RSL
- Cancel and undelivered orders
- Apply penalties or discounts
- Recover disposal costs



## Appendix:

Restricted Substance List (RSL) and test matrix

**EUROFINS** contact information

**EUROFINS** test form

**Eurofins Contact Information:** 

INDIA:

Nitesh - <u>NiteshSrivastav@eurofins.com</u>

CC: RafaelJimenezAlcaide@eurofins.com; AartiTyagi@eurofins.com

CHINA:

Pearl - PearlWang@eurofins.com

Cc: RafaelJimenezAlcaide@eurofins.com; MonicaJi@eurofins.com

Contact for CAMILLA for worldwide testing, inspections or audits service, inquiries and consultation:

RafaelJimenezAlcaide@eurofins.com

## **Eurofins Test Form:**

Please see Attached WORD Documents for China & India