



**CHEMICAL POLICY & RESTRICTED
SUBSTANCE LIST
VERSION 2022**

**QUESTIONS, COMMENTS OR TO VERIFY THAT YOU HAVE THE MOST UP-TO-
DATE VERSION. PLEASE CONTACT: RSL@KEENFOOTWEAR.COM**



WHY THIS POLICY?

MEET STRICT GLOBAL REGULATIONS AND OUR OWN VOLUNTARY STANDARD.

Greetings:

KEEN is a values-led, independently owned brand from Portland, Oregon, on a mission to create original and durable products, enhance lives and protect the planet.

One very important aspect to achieving our mission is reducing the use and impact of harmful substances in our supply chain to ensure that the products we make are safe for workers, consumers, and the environment.

KEEN's Chemical Policy & Restricted Substances List ("Policy") integrates substances that we have voluntarily restricted in our product. These voluntarily restrictions are clearly outlined in Section 2, as well as depicted in Testing Matrix (see Table 5). In addition to voluntary restrictions, the Policy is based on the strictest global regulations with regards to the environment, human health, and product safety as set forth by Apparel & Footwear International RSL Management Group (AFIRM) (<http://www.afirm-group.com/>). The Policy is developed in line with EU REACH and California Prop 65, as well as legislative and regulatory requirements set by countries where KEEN operates and manufactures.

The long-term objective of our Policy is to enable continuous advancement of chemical management best practices. We are taking a proactive stance on specific classes of chemicals that are voluntarily restricting in our products and replacing them with safe, effective and affordable alternatives suitable for our sourcing requirements. These voluntarily restrictions are clearly outlined in Section II below, as well as depicted in the KEEN Testing Matrix (see Table 6).



To achieve our long-term objective, we must embrace systems for disclosure about chemical use in our supply chain based on the "right to know" principle. In line with this principle, we continue to increase the public transparency of our Policy and chemical management process through our brand marketing initiatives and online digital presence. A recent example is our Green Paper (<https://www.keenfootwear.com/detox/>) on how to eliminate PFAS in the supply chain.

Thank you for your compliance with our ambitious Policy and for your collaboration in keeping KEEN at the forefront of the footwear industry.

Sincerely,

Rory Fuerst, Sr.
Founder, CEO and President, [KEEN](https://www.keenfootwear.com/)



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I. Introduction

KEEN’s Chemical Policy & Restricted Substances List (“Policy”) is based on substances that we have voluntarily restricted in our product. These voluntarily restrictions are clearly outlined below. In addition to voluntary restrictions, the Policy is in line with AFIRM RSL Version 7 v2022 (www.afirm-group.com/afirm-rsl/) and Packaging RSL (www.afirm-group.com/packaging-restricted-substance-list) Version 4 2021, and in some cases the Policy go further as depicted in the KEEN Testing Matrix (Table 6).

II. Voluntary Chemical Phase-Outs: A Six Classes Approach to Reducing Chemical Harm

The Six Classes approach allows KEEN to better understand these harmful chemicals, their functions, where they are used, and how they can be eliminated. Learn more at www.sixclasses.org.

1. **PFAS:** Commitment to treating articles with PFAS-free alternatives for DWR non-wicking treatments based on a very strict list of banned substances (see Appendix E)
2. **Antimicrobials:** Commitment to treating articles with pesticide/biocide-free antimicrobial alternatives for managing odor
3. **Flame Retardants (FR):** Commitment to the precautionary approach for organohalogen and organophosphate chemicals
4. **Phthalates:** Commitment to phthalate-free chemicals processes for making plastics (polymers) stronger or more flexible
5. **Some Solvents:** Commitment to reducing solvent usage, i.e., carbon disulfide, MEK, cyclohexylamine, toluene and DMFa
6. **Certain Metals:** Commitment to eliminating use of mercury, arsenic, cadmium, and lead in production processes

III. Regulatory Requirements

Certain regulations, including those described below in Table 1, require reporting by the manufacturer or importer when certain substances are present in products. All Suppliers (refer to Section IV) are responsible for keeping abreast of regulatory changes to ensure that our products comply with the Policy and all legal requirements.

Factories are required to submit finished products for third-party testing to verify product compliance with certain regulatory requirements in the United States, Turkey, Japan and China as outlined below in Section VIII.

Table 1: Regulatory Requirements

EU REACH European Union Registration, Evaluation, Authorisation and Restriction of Chemicals	EU REACH aims to ensure a high level of protection for human health and the environment. It includes Annex XVII (substances restricted in the European Union under the legislation), list of Substances of Very High Concern (SVHC) and Annex XIV (the list of substances subject to authorization prior to their placement on the market or use after a specified date). Suppliers are responsible to continuously review updates to Annex XVII, list of SVHC and Annex XIV to make sure that all the materials/products provided to KEEN comply with the REACH requirements. Suppliers must be aware of this list as it grows and changes and should avoid using Annex XVII and SVHCs in materials and products. Find the most current version at www.echa.europa.eu .
California Prop 65 State of California Safe Drinking Water and Toxic Enforcement Act of 1986	Proposition 65 annually publishes a list of chemicals known to cause cancer, birth defects, and reproductive harm. The regulation is significant because it requires manufacturers and businesses to label products containing any of the harmful chemicals and allows consumers to initiate legal action against a manufacturer or business which fails to provide a reasonable warning. For consumer products, this is typically through warning labels on the products or retail signage. This means that the chemical content in all our products, or any part of a product, should be manufactured in a way that no warning signs are needed according to the requirement of Proposition 65. Additional information can be found at www.oehha.ca.gov/proposition-65 .



Toxic-Free Kids Act State of Oregon Toxic-Free Act of 2015 for children's products	The US State of Oregon's Toxic-Free Kids Act is a toxics reporting regulation. The Oregon Health Authority maintains a list of High Priority Chemicals of Concern for Children's Health (HPCCCH). Some of these substances are included in the Policy. Suppliers must be aware of HPCCCH as it grows and changes. Reporting is required if the HPCCCH is intentionally added and exceeds the practical quantification limit (PQL) or a contaminant that exceeds 100 ppm. Suppliers should avoid using HPCCCH in materials and products. Suppliers must notify KEEN whenever either of the conditions above are true for a material in any product. A current list of HPCCCH is posted at https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/HEALTHYNEIGHBORHOODS/TOXICSUBSTANCES/Pages/childrens-chemicals-of-concern.aspx .
Children's Safe Products Act State of Washington Children's Safe Products Act of 2008	The US State of Washington's Children's Safe Products Act (WA CSPA) is a toxics reporting regulation. The Washington State Department of Ecology maintains a list of Chemicals of High Concern to Children (CHCC). Suppliers must be aware of the CHCC list as it grows and changes. Some of these substances are included in the Policy. WA CSPA requires US importers to report the presence of a CHCC that is either: intentionally added at any concentration, or present as a contaminant (not intentionally added) at over 100 ppm. Suppliers should avoid using CHCCs in materials and products. Suppliers must notify KEEN whenever either of the conditions above are true for a material in any product. A current list of CHCCs is posted at https://ecology.wa.gov/Regulations-Permits/Reporting-requirements/Reporting-for-Childrens-Safe-Products-Act .

IV. Scope

All KEEN **footwear, bags, apparel, accessories and packaging** suppliers must adhere to the standards and processes set forth in the Policy. Suppliers are defined by two major categories:

- **Material Suppliers:** These suppliers provide materials, trims, adhesives, etc. for use in finished products, and includes textiles, zippers, plastic components, shoelaces & metal parts.
- **Factories:** These suppliers provide finished products that are ready for sale. Examples of finished products include shoes, boots and sandals.

In some cases, a Factory may also be considered a Materials Supplier, such as when the Factory sources some of its own materials, including sundry trims, adhesives, foams or non-wicking treatments.

All materials, components and finished products supplied to or for KEEN must comply with BOTH the:

- Standards set forth in the Policy**
- All applicable international directives, laws, and regulations** that restrict the type and concentration of potentially hazardous substances in our products. Suppliers are responsible for compliance with any new directives, laws, or regulations that are enacted

Please refer to Table 2 for examples of materials within Scope of the Policy.

Table 2: Examples of Materials within Scope of the Policy

Natural Fibers Including semi-synthetics	Cotton, Wool, Silk, Hemp, Cashmere, Linen, Fur, Rayon (Semi-synthetic), Lyocell (Semi-synthetic)
Blended Fibers	Cotton-Polyester, Wool-Nylon, Ramie-Polyesters
Synthetic Fibers	Polyester, Acrylic, Nylon, Polyamide
Artificial Leather	Polyurethane (PU), Polyvinyl Chloride (PVC)
Natural Leather	Leather, Fur Skin
Coatings & Prints	Printing techniques such as: Heat transfers, Dye sublimation printing, Screen printing, Direct-to-garment printing, Discharge printing, Plastisol transfers. Coatings such as: Polyvinyl chloride (PVC), Polyurethane (PU), UV-cured
Natural Materials	Horn, Bone, Cork, Wood, Paper, Straw, Stone
Polymers, Plastics, Foams, Natural rubber & synthetic rubber	Ethylene vinyl acetate (EVA), Polystyrene (PS), Polyethylene (PE), Acrylonitrile butadiene styrene (ABS), Neoprene, Polypropylene (PP), Polycarbonate (PC), Polyamide (PA), Polyurethane (PU), Polyvinyl chloride (PVC), Thermoplastic polyurethane (TPU), Thermoplastic elastomer (TPE), Styrene ethylene butylene styrene (SEBS)
Metal	Stainless steel, Brass, Copper, Gold, Silver, Aluminum
Feather & Down	Feathers, Down
Glue	Hot melt adhesive, Powdered adhesive, Flock, adhesive, Contact, adhesive, Latex glue, Polyurethane, glue, Neoprene cement, Epoxies, Silicone adhesive, UV-cured adhesive
Packaging	Hangtags, Stickers, Protective Coverings, Trimmings, Sales & Transportation Packaging, Footforms



V. Responsibilities

Responsibilities of Material Suppliers and Factories are as described below:

- a. General Responsibilities for All Suppliers
 1. Identify a contact person with the authority to ensure that the supplier's obligations under the Policy are effectively executed.
 2. Provide only materials and products that comply with the standards set forth in **the Policy**.
 3. Pass on requirements to and be responsible for the compliance of the next tier of suppliers, subcontractors, additional production facilities, etc.
 4. Do not make any changes to materials or production processes that could affect testing results after passing testing.
 5. Collect test reports and maintain as records for 5 years.
 6. Assume responsibility for costs incurred by KEEN due to violations of the Policy, including providing materials or finished products that contain restricted substances beyond the limits set forth in the Policy.

- b. Material Supplier Responsibilities
 1. All responsibilities listed above for **All Suppliers**.
 2. Sign and return the **Materials Supplier Acknowledgement of Compliance with Policy** (see Appendix A) within 10 business days after receipt of the Policy.
 3. Work with raw materials suppliers to ensure raw materials (fiber, dyestuff, chemicals, etc.) comply with the standards set forth in the Policy.
 4. Provide only materials that comply with the Policy's limits.
 5. Carry out requested testing prior to finished product bulk production. **Testing is to be conducted by an Approved Testing Lab.**
 6. Deliver a copy of applicable test results to the Factory with each shipment of materials.
 7. Upon request, provide the complete Bill of Substances (BOS) for any material or component produced for or supplied to KEEN.

- c. Factory Responsibilities
 1. All responsibilities listed above for **All Suppliers**.
 2. Sign and return the **Factory Acknowledgement of Compliance with Policy** (see Appendix B) within 10 business days of receipt of the Policy.
 3. Provide only finished products that comply with the standards set forth in **the Policy**.
 4. If sourcing any materials, ensure those materials also comply with the standards set forth in the Policy and conduct testing as set forth in the Materials Supplier Requirements above.
 5. Review test reports from Materials Suppliers and **ensure materials and components comply with the Policy's limits prior to production**. Test reports for each model/style must be scanned and sent to the KEEN's point of contact prior to production to Smalling Luo (rsl@keenfootwear.com).
 6. Whenever required, submit samples of finished products to an **approved third-party testing lab for RSL testing**.

VI. Testing Matrix

The Testing Matrix is a prescriptive approach to help material suppliers and factories cost-effectively manage chemical risks by adopting a common testing approach for use and acceptance across different brands. Chemicals assigned a Level 1 in materials should be viewed as the minimum amount of testing required to satisfy requirements, and chemicals assigned a Level 2 are recommended for additional testing.



The Testing Matrix was developed by AFIRM utilizing multiple sources of information, including industry RSL testing information, a broad understanding of global supply chain operations, and from nearly two decades of managing restricted substances across a wide range of materials.

The Testing Matrix uses the following color codes:

1	Red = Higher risk. Testing Required.
2	Orange = Lower risk. Testing recommended and may be required at KEEN's discretion.
	Lowest risk. Not anticipated in material.

It is our goal to reduce the testing burden and streamline the RSL testing approach, while further reducing risk of restricted substances in materials and products.

The risk or likelihood of restricted substance being present in a material is given by color. **Red** color-coded restricted substances are required Routine Testing.

VII. General Testing Procedure

Various material types and finished products must be routinely tested for different restricted substances. The required test for a certain material or finished product is referred to as a "test package." Please refer to Table 3: Material Suppliers Testing Procedure, Table 4: Factories Testing Procedure, Table 5: Definitions of Ages, and Table 6: KEEN Testing Matrix.

Routine testing requirements by Material Type as outlined in Table 5 below describes which "test package" is required for different material types and for finished products as part of Routine Testing. These "test packages" are based on regulatory requirements and assessment of risk of presence of substances in various material types. KEEN may request additional tests at any time on any material for any RSL substance.

Table 3: Material Suppliers Testing Procedure

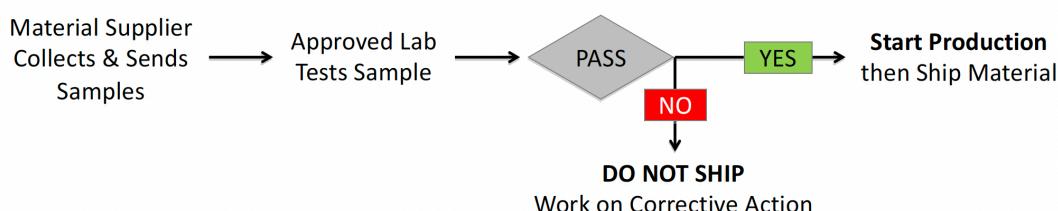


Table 4: Factory Testing Procedure

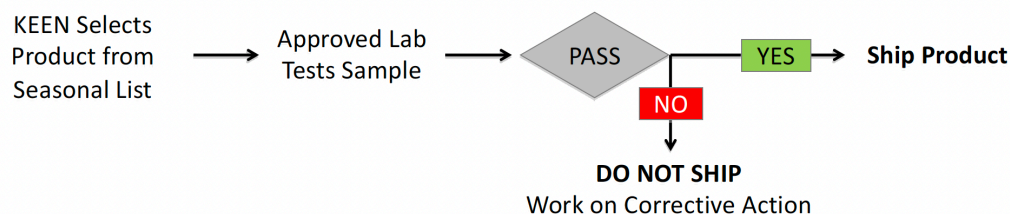


Table 5: Definition of Ages*

	Age Range
Babies	0 to 36 months
Children	36 months to 14 years
Adults	14 years and older

*Various countries define the terms "babies," "children," and "adults" differently. Based on legislation, the age ranges listed in Table 4 satisfy the most restrictive global requirements.



Table 6: KEEN Testing Matrix

All Items highlighted in **YELLOW** are KEEN-specific requirements above and beyond AFIRM. For Recycled materials, additional testing may be required at Level 1; check with KEEN on requirements.

Substance	Natural Fibers	Synthetic Fibers	Natural & Synthetic Blended Fibers	Artificial Leather With fiber backing	Natural Leather	Natural Materials	Metals	Feathers & Down	Polymers											
									EVA	PU Foam	All Other PU & TPU	Rubber (Excludes Latex and Silicone Rubbers)	Polycarbonate KEEN USAGE BAN	ABS	PVC KEEN USAGE BAN	All Other Foams, Plastics & Polymers	Coatings & Prints	Glue		
Acetophenone and 2-Phenyl-2-Propanol									1											
Acidic and Alkaline Substances (pH)	1	1	1	1	1															
Alkylphenol (AP) and Alkylphenol Ethoxylates (APEOs), incl. all isomers	1	1	1	1	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
Azo-amines and Arylamine salts	1	1	1	1A	1	1A		1A												1
Bisphenol-A	1	1	1	1		1			2	2	2	2	1	2	2	2	2	1	1	1
Butylhydroxytoluene (BHT)																	2			
Chlorinated Paraffins				2	1				2	2	1	1	2	2	1	2				
Chlorophenols	2	1	1		2															
Chlorinated Benzenes and Toluenes		2	2	2																
Dimethylfumarate (DMFu)					2															
Dyes, Forbidden and Disperse		1	1	1															2	
Dyes, Navy Blue		2	2																	
Flame Retardants	1B	1B	1B			1B		1B		1B										
Fluorinated Greenhouse Gases																				
Formaldehyde	1	1	1	2	1	1C						2							1	1
Heavy Metals, Chromium VI	2D	2E			1															
Heavy Metals, Extractable	1	1	1	2	1		2F		2	2	2	2	2	2	2	2	2	2	2	
Heavy Metals, Nickel Release							1													
Heavy Metals, Total	2G		2G	1	2		1		1	1	1	1	1	1	1	1	1	1	1	2
Packaging Heavy Metals - TPCH	1H																			
Monomers, Styrene & Vinyl Chloride				2J								2K		2	1				1	
N-Nitrosamines												2								
Organotin Compounds		2	2	1	2				1	1	1				1	1	1	1	1	1
Ortho-phenylphenol (OPP)	2	2	2	2	2														2	
Ozone-depleting Substances																				
Perfluorinated & Polyfluorinated Chemicals (PFCS)	1L																			
Pesticides, Agricultural																				
Phthalates				1					1	1	1	1	2	2	1	1	1	1	1	1
Polycyclic Aromatic Hydrocarbons (PAHs)				1M					1M	1M	1M	1			1M	1M	1	1M	1M	
Quinoline		2	2																	
Solvents/Residuals, DMFa				1						1	1								1N	1N
Solvents/Residuals, DMAC and NMP				1						2	2					2	2	2	2	
Solvents/Residuals, Formamide									2										2	
UV Stabilizers/ Inhibitors									2	2	2	2	2	2	2	2	2	2		
Volatile Organic Compounds (VOCs)				2					2	2	2	2	2	2	2	2	2	2	2	1

<p>A Level 1 for dyed/colored materials. B Level 1 if Flame Retardant use or contamination is suspected. C Level 1 for Wood, Paper, and Straw materials.</p>	<p>D Level 2 for Wool materials. E Level 2 if extractable Chrome above 1 ppm. F Copper is exempt from restricted limits in Metal parts.</p>	<p>H For Packaging material only. J Level 1 for PVC materials; KEEN components usage ban. K Level 2 for Styrene/Butadiene Rubbers (SBRs) only.</p>	<p>L Level 1 if a PFAS Fluorinated finish is applied; Level 1 for Wool; Level 1 for PU film with "hand feel" finishing. M Level 1 if Rubber or black Polymeric materials.</p>
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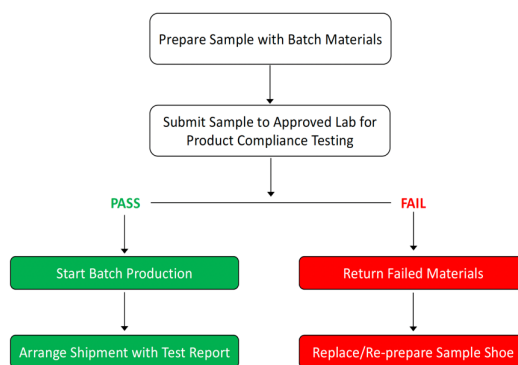
VIII. Product Compliance Testing Requirements for Factories

Factories are required to submit finished products for third-party testing to verify Product Compliance with regulatory requirements if the finished products are being shipped to the United States, Turkey, Japan or China. KEEN must verify Product Compliance for testing reports prior to approving the shipment. Please refer to Table 7: Standard Operating Procedure for Product Compliance.

Regulatory Requirements

1. **United States**
Consumer Product Safety Improvement Act (CPSIA) FOR Children’s products
2. **Japan**
Formaldehyde for Babies Footwear, Test at SAP level (see Table 5)
3. **Turkey**
Phthalates for all footwear
4. **China**
GB/T 15107 for footwear at the Model level

Table 7: Standard Operating Procedure



Note: Must comply with all applicable regulations, not just receive “Pass” report.

Report Validity

Test results are valid for one (1) year from the test date. Any changes made to the manufacturing process (including changes to materials, inputs, processing, finishes, machinery, facilities, etc.) invalidate previous test results. KEEN must be notified of any such changes and the product must be re-tested.

Cost Responsibility

KEEN will pay for finished product compliance testing for the United States, Turkey, Japan and China if all tests pass. If any tests fail, this testing cost will be charged to the factory.

Sample Submission Guideline

- 1) **Sample Size:** 2 Pairs of Finished Shoes and some small parts components

CPSIA	Total Lead Test request a minimal 0.5g for each Test items
Turkey	Phthalates Test request a minimal 1.0g for each Test items
Japan	Formaldehyde Test request a minimal 2g for each Test items
China	Physical and Chemical Test request 2 addition pairs’ components

2) **Submission Package:**

Same style name and colorway can be put into a one Submission Package. For example, Leather Boot includes Children, Youth and Adult; therefore, add 3 SAP# in Test Request Form and test in same Submission Package.

3) **Sample Send To:**

a) **Intertek – Guangzhou, China**

Address: E201, No.7-2, Caipin Road, Guangzhou Science City, GETDD Guangzhou 510663
Contact: Ms. Scarlett Wang
Tel: 86 20 8213 9275 **Fax:** 86 20 8208 9909
Email: scarlett.xq.wang@intertek.com
Note: For China GB/T 15107 testing, send sample to Intertek – Guangzhou



b) SGS – Guangzhou, China

Address: 198 Ke Zhu Road, Science Park, Economic and Technological Development Zone, Guangzhou, China 510663
Contact: Cassie Dai
Tel: 0086 (0)20 32136643 **Fax:** 0086 (0)20-82075169
Email: cassie.dai@sgs.com

c) SGS – Hong Kong

Address: 4/F, On Wui Centre, 25 Lok Yip Road, Fanling, New Territories, Hong Kong
Contact: WingYan Law
Tel: +852 2774 7151 **Fax:** +852 2330 4862
Email: WingYan.Law@sgs.com

d) SGS – Bangkok, Thailand

Address: 1025/1 Soi Rama III (61), Rama III Road, Chongnonsee, Yannawa, Bangkok, 10120 Thailand
Contact: Bhuwadon Samlam
Tel: +66 (0)2 481 5259 ext. 6413 **Fax:** +66 (0)2 481 5260
Email: Bhuwadon.Samlam@sgs.com

e) Intertek – Phnom Penh, Cambodia

Address: No. 13 AC. Street 337, Sangkat Boeung Kak I, Khan Tuol Kork, Phnom Penh, Cambodia, 12151
Contact: Sao Hean (Mr.)
Tel: (855) 23 885 421 **Mobile:** (855) 77 555 692
Email: sao.hean@intertek.com

f) SGS – Ho Chi Minh, Vietnam

Address: Lot III/21, 19/5A Street, Industrial Group III, Tan Binh Industrial Zone, Tay Thanh Ward, Ho Chi Minh, Vietnam
Contact: Nga Bui
Tel: +84 8 3816 0999 (ext. 655) **Mobile:** +84 8 3816 0996
Email: Nga.Bui@sgs.com

g) SGS – Chennai, India

Address: 28 B1 (SP)/28 B2 (SP), 2nd Main Rd, Ambattur Industrial Estate, Ambattur, Chennai 600 058, Tamilnadu, India
Contact: Mr. U.S. Asmathullah
Tel: +91 8939822235
Email: Asmathullah.US@sgs.com

h) Other Locations—ROFU

Contact: Smalling Luo
Mobile: +86 13416 138355
Email: smalling.luo@rofucn.com

IX. Re-testing Guidelines

Materials

If a material fails testing, it must be reprocessed, remanufactured, or substituted before being retested. KEEN must approve in advance in writing the material supplier's plan to correct failed materials. A supplier may not re-test a material without making the appropriate changes.



Finished Products

If a finished product fails testing, it must be remade with reprocessed, remanufactured, or substituted materials before being retested. KEEN must approve in advance in writing the material supplier's plan to correct a failed finished product.

Finished products submitted for re-testing must be submitted with a note on the Test Request Form saying:

- *“Only retest for failed materials. All other materials are the same as on test report [insert test report number which had RSL failure] which was issued on [DD/MM/YYYY].”*
- *“Lab should transfer passing test results from previous test report and combine with re-test result for previously failed materials/component.”*

All re-testing results must be sent to KEEN's RSL point of contact.

X. Non-compliance and Corrective Action

A failure to comply with the terms of the Policy, including providing materials or finished products that contain restricted substances beyond the limits set forth the Policy, is considered a breach of contract and may, at KEEN's sole discretion, result in suspension or termination of their relationship with a material supplier or factory. Any costs incurred by KEEN as a result of a violation of the Policy will be the sole responsibility of the material supplier or factory (up to the amount paid by KEEN to the material supplier or factory during the twelve (12) month period prior to any such violation).

If KEEN determine, in its sole discretion, that a material supplier or factory has violated the terms of the Policy, the material supplier or factory agrees to:

1. Investigate the cause and extent of the violation and document this work by completing the **RSL Failure Resolution Form (FRF)** (Appendix C) or other documentation as requested. The FRF is to be completed by the responsible party whenever a failed restricted substance test result is received.
2. Undertake Corrective Action, which action must be approved in advance in writing.

KEEN will respond to violations of the Policy as follows:

1. Review and approve the **RSL Failure Resolution Form (FRF)** (Appendix C), any other documents, and the supplier's corrective action plan.
2. Conduct an audit to check whether the corrective action successfully addressed the violation.
3. Take further actions to be determined by KEEN, which may include suspending or terminating their relationship with the material supplier or factory.

XI. Auditing Process

General Auditing (Material Suppliers and Factories):

Material Suppliers and factories may be audited prior to doing business with KEEN, during product sourcing and manufacturing, when quality issues arise, or when otherwise determined by KEEN. See Appendix D for annual Audit Document.

Factory Auditing

Factory audits will be conducted by KEEN annually or more frequently, if necessary, to ensure compliance with the Policy. Factories should be able to demonstrate that KEEN products are made only with materials accompanied by valid, passing tests and that these test results are in-hand prior to the start of bulk production.



APPENDIX A

MATERIAL SUPPLIER ACKNOWLEDGEMENT OF COMPLIANCE WITH POLICY

To be completed by any supplier classified as a Materials Supplier (a supplier that provide materials, trims, adhesives, etc. for use in finished products). A supplier may be a Materials Supplier and a Factory.

To: KEEN, Inc. (“KEEN”)

The undersigned, a duly appointed Officer of the company set forth below (the “Company”), hereby acknowledges receipt of, understanding of, and agreement with the **Chemical Policy and Restricted Substances List**. On behalf of the Company, the undersigned certifies that all products (and every component thereof) produced and shipped on behalf of KEEN by the Company will comply with the **Chemical Policy and Restricted Substances List**. The undersigned acknowledges and agrees that the Company shall be responsible for any costs incurred by KEEN as a result of any violations of the **Chemical Policy and Restricted Substances List** (up to the amount paid by KEEN to the Company during the twelve (12) month period prior to any such violation).

By signing this agreement, we also agree that KEEN has the right to:

- Inspect and test any product and production process,
- Cancel an order or return the materials if it does not comply with the **Chemical Policy and Restricted Substances List**,
- Receive the material safety data sheets (SDS) for all substances and preparations used in the production process,
- In the event of any violations of the **Chemical Policy and Restricted Substances List**, KEEN has the right to be fully compensated for any costs incurred.

Signature:	
Name & Title	
Company:	
Address:	
Date:	

Complete the above fields and send signed copy to:

Smalling Luo
RSL Compliance Senior Manager
smalling.luo@rofucn.com



APPENDIX B

FACTORY ACKNOWLEDGEMENT OF COMPLIANCE WITH POLICY

To be completed by any supplier classified as a Factory (a supplier that ships finished products). A supplier may be a Materials Supplier and a Factory.

To: KEEN, Inc. (“KEEN”)

The undersigned, a duly appointed Officer of the company set forth below (the “Company”), hereby acknowledges receipt of, understanding of, and agreement with the **Chemical Policy and Restricted Substances List**. On behalf of the Company, the undersigned certifies that all products (and every component thereof) produced and shipped on behalf of KEEN by the Company will comply with the **Chemical Policy and Restricted Substances List**. The undersigned acknowledges and agrees that the Company shall be responsible for any costs incurred by KEEN as a result of any violations of the **Chemical Policy and Restricted Substances List** (up to the amount paid by KEEN to the Company during the twelve (12) month period prior to any such violation).

By signing this agreement, we also agree that KEEN has the right to:

- Inspect and test any product and production process,
- Cancel an order or return the materials and/or products if it does not comply with the **Chemical Policy and Restricted Substances List**,
- In the event of any violations of the **Chemical Policy and Restricted Substances List** KEEN has the right to be fully compensated for any costs incurred.

Signature:	
Name & Title	
Company:	
Address:	
Date:	

Complete the above fields and send signed copy to:

Smalling Luo
RSL Compliance Senior Manager
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APPENDIX C

RSL FAILURE RESOLUTION FORM (FRF)

PRODUCT TYPE: Footwear Apparel Other:		RSL SUBMISSION ID (Failed Report #):	
LAB WHERE SAMPLE WAS TESTED: INTERTEK BV SGS Name of Lab:			
VENDOR INFORMATION:			
Submitter Company:		Vendor Name	Vendor Code
		Factory Name	Factory Code
INVOICE TO:		TEL:	
ADDRESS:		FAX:	
CONTACT PERSON:		EMAIL:	
SAMPLE DESCRIPTION:			
Product or Style Number (SAP)	Material Name	Material Type	Date Material Made
			Date Sample Submitted
Sample Type: Production Quality Material R&D Material Finished Product Retest Sample			
TESTING INFORMATION:			
Name of Failed Substance			
Lab Test Report # (attach test report)			
Lab Test Result (from test report)			
Restricted Substance Limit for Failed Substance			
Trade name and CAS# of chemical causing failure			
Why is this chemical being used?			
Provide an Action Plan and Timeline to show when and how the Corrective Action will be completed to address:			
1. Existing failed material/product: immediate action			
2. Future material/products: develop a prevention plan			
3. Timeline			
I WILL ENSURE THE COMPANY I REPRESENT IMPLEMENTS THE CORRECTIVE ACTION LISTED ABOVE SO THAT ALL FUTURE PRODUCTION OF THIS FAILED MATERIAL WILL MEET THE REQUIREMENTS OF THE KEEN CHEMICAL POLICY AND RESTRICTED SUBSTANCE LIST VERSION 2022.			
Signature		Date:	



APPENDIX D

RSL AUDITING DOCUMENT

Supplier Name:
 Total Score:

20	Supplier RSL Statement (10 Score)	Yes	No	Partial (As %)	Comments
1	Supplier has signed and returned KEEN RSL Policy 'Certificate of Compliance with KEEN Restricted Substance' Statement ? (10 Score)				
	Supplier RSL Point of Contact (15 Score)	Yes	No	Partial (As %)	Comments
2	Supplier has an internal named point of contact for KEEN RSL? (5 Score)				
3	RSL point of contact can ensure RSL activities are effectively executed? (5 Score)				
4	Supplier RSL knowledge review. (5 Score)				
	Supplier RSL Work Process (25 Score)	Yes	No	Partial (As %)	Comments
5	Supplier has a work process for KEEN RSL compliance? (5 Score)				
6	Work process is able to verify production compliance with KEEN's RSL? (5 Score)				
7	Supplier documents the RSL work process? (5 Score)				
8	Supplier documents its RSL Policy? (2 Score)				
9	Supplier documents the RSL named point of contact for their supply chain partners? (3 Score)				
10	Performance review of supplier RSL work process. (5 Score)				
	Supplier RSL Record Keeping (20 Score)	Yes	No	Partial (As %)	Comments
11	Supplier provides Routine Testing Report? (5 Score)				
12	Supplier conducts self-check testing on its product? (5 Score)				
13	Supplier documents RSL test reports for KEEN products? (5 Score)				
14	Testing records are able to verify products compliance with KEEN's RSL? (5 Score)				
	Non-Compliance and Corrective Action (20 Score)	Yes	No	Partial (As %)	Comments
15	Supplier passes all routine testing and random testing? (20 Score, if "yes" not need to answer 16-19)				
16	Supplier provides Corrective Action Plan to KEEN/ROFU? (5 Score)				
17	Corrective Action approved by KEEN/ROFU? (3 Score)				
18	Corrective Action record is complete? (5 Score)				
19	Performance review of Corrective Action. (5 Score)				
	Communication and Cooperation (10 Score)	Yes	No	Partial (As %)	Comments
20	RSL Communication E-mail Respond (within 1 day = 5; 1-2 days = 2; 2-3 days = 0; >3 days = -2)				
21	RSL Random Testing Project cooperation (Good = 5, Medium = 3, Poor = 0)				

Behalf of Supplier: Title: Date:	Behalf of KEEN/ROFU: Title: Date:
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APPENDIX E

PFSA LIST OF RESTRICTED SUBSTANCES

No.	Substances	CAS#	Reporting Limit		Remark
			µg/m ²	µg/kg	
1	Perfluorooctanoic acid(PFOA) and its Salts #1	Various, see remark #1	0.4	2	AFIRM Requirement
2	Perfluorooctane sulfonate(PFOS) and its Salts #2	Various, see remark #2	0.4	2	AFIRM Requirement
3	1H,1H,2H,2H-Perfluorodecanol (8:2 FTOH)	678-39-7	10	100	KEEN Requirement
4	1H,1H,2H,2H-Perfluorodecyl acrylate (8:2 FTA)	27905-45-9	1	10	KEEN Requirement
5	Methyl perfluorooctanoate (Me-PFOA)	376-27-2	0.4	2 (SGS 10)	KEEN Requirement
6	1H,1H,2H,2H-Heptadecafluorodecyl methacrylate (8:2 FTMA)	1996-88-9	1	10	KEEN Requirement
7	Ethyl perfluorooctanoate (Et-PFOA)	3108-24-5	0.4	2 (SGS 10)	KEEN Requirement
8	1H,1H,2H,2H-Perfluorodecanesulfonic acid (8:2 FTS)	39108-34-4	0.4	2	KEEN Requirement
9	Perfluorooctyl iodide (PFOI)	507-63-1	1	10	KEEN Requirement
10	Perfluorooctane Sulfonamide (PFOSA)	754-91-6	0.4	2	KEEN Requirement
11	2-(N-methylperfluoro-1-octanesulfonamido) - ethanol (MeFOSE)	24448-09-7	0.4	2	KEEN Requirement
12	2-(N-ethylperfluoro-1-octanesulfonamido)-ethanol (EtFOSE)	1691-99-2	0.4	2	KEEN Requirement
13	N-methylperfluoro-1-octanesulfonamide (MeFOSA)	31506-32-8	0.4	2	KEEN Requirement
14	N-ethylperfluoro-1-octanesulfonamide (EtFOSA)	4151-50-2	0.4	2	KEEN Requirement
15	Perfluorobutane Acid (PFBA)	375-22-4	0.4	2	KEEN Requirement
16	Perfluorobutane Sulfonate (PFBS)	375-73-5	0.4	2	KEEN Requirement
17	Perfluoropentane Acid (PFPA)	2706-90-3	0.4	2	KEEN Requirement
18	Perfluorohexane Acid (PFHxA)	307-24-4	0.4	2	KEEN Requirement
19	Perfluorohexane Sulfonate (PFHxS)	355-46-4	0.4	2	KEEN Requirement
20	Perfluoroheptane Acid (PFHpA)	375-85-9	0.4	2	KEEN Requirement
21	Perfluoroheptane Sulfonate (PFHpS)	375-92-8	0.4	2	KEEN Requirement
22	Perfluorodecane Sulfonate (PFDS)	126105-34-8	0.4	2	KEEN Requirement
23	Perfluorononane Acid (PFNA)	375-95-1	0.4	2	KEEN Requirement
24	Perfluorodecane Acid (PFDA)	335-76-2	0.4	2	KEEN Requirement
25	Perfluoroundecanoic Acid (PFUnA)	2058-94-8	0.4	2	KEEN Requirement
26	Perfluorododecanoic Acid (PFDoA)	307-55-1	0.4	2	KEEN Requirement
27	Perfluorotridecanoic Acid (PFTrA)	72629-94-8	0.4	2	KEEN Requirement
28	Perfluorotetradecanoic Acid (PFTeA)	376-06-7	0.4	2	KEEN Requirement
29	Perfluoro-3,7-dimethyloctanoic Acid (PF-3,7-DMOA)	172155-07-6	0.4	2	KEEN Requirement
30	7H-Dodecanefluoroheptane Acid (HPFHpA)	1546-95-8	0.4	2	KEEN Requirement
31	2H,2H-Perfluorodecane Acid (H2PFDA)	882489-14-7	0.4	2	KEEN Requirement
32	2H,2H,3H,3H-Perfluoroundecanoic Acid (H4PFUnA)	34598-33-9	0.4	2	KEEN Requirement
33	Perfluorooctanesulphonic acid 1H,1H,2H,2H (H4PFOS; 6:2)	27619-97-2	0.4	2	KEEN Requirement
34	1H,1H,2H,2H-Perfluorooctylacrylate (6:2 FTA)	17527-29-6	1	10	KEEN Requirement
35	1H,1H,2H,2H-Perfluorododecylacrylate (10:2 FTA)	17741-60-5	1	10	KEEN Requirement
36	1H,1H,2H,2H-Perfluoro-1-hexanol (4:2 FTOH)	2043-47-2	10	100	KEEN Requirement
37	1H,1H,2H,2H-Perfluoro-1-octanol (6:2 FTOH)	647-42-7	10	100	KEEN Requirement
38	1H,1H,2H,2H-Perfluoro-1-dodecanol (10:2 FTOH)	865-86-1	10	100	KEEN Requirement
39	1H,1H,2H,2H-Perfluorodecyl iodide (8:2 FTI)	2043-53-0	1	10	KEEN Requirement
40	Perfluorooctylethene	21652-58-4	1	10	KEEN Requirement
41	2,3,3,3-tetrafluoro-2-(heptafluoropropoxy) propionic acid, its salts and its acyl halides	13252-13-6	0.4	2	KEEN Requirement
42	1H, 1H, 2H, 2H-Perfluorohexanesulfonic Acid (H4-PFGxS(4:2 FTS))	757124-72-4	0.4	2	KEEN Requirement
43	N-(Perfluoro-1-octanesulfonyl) Glycine	2806-24-8	0.4	2	KEEN Requirement
44	N-Methylperfluoro-1-octanesulfonamidoacetic Acid	2355-31-9	0.4	2	KEEN Requirement
45	N-Ethyl-N-(perfluoro-1-octanesulfonyl) Glycine	2991-50-6	0.4	2	KEEN Requirement

Remarks

#1

The Reported Value Was Calculated By Summation Of The Values Of Perfluorooctanoic acid (PFOA, CAS#335-67-1), Sodium perfluorooctanoate (PFOA-Na, CAS#335-95-5), Potassium perfluorooctanoate (PFOA-K, CAS#2395-00-8), Silver perfluorooctanoate (PFOA-Ag, CSA#335-93-3), Perfluorooctanoyl fluoride (PFOA-F, CAS#335-66-0), Ammonium pentadecafluorooctanoate (APFO, CAS#3825-26-1)

#2

The Reported Value Was Calculated By Summation Of The Values Of Perfluorooctanesulfonic Acid (PFOS), Perfluorooctanesulfonic acid, potassium salt (PFOS-K, CAS#2795-39-3), Perfluorooctanesulfonic acid, lithium salt (PFOS-Li, CAS#29457-72-5), Perfluorooctanesulfonic acid, ammonium salt (PFOS-NH₄, CAS#29081-56-9), Perfluorooctane sulfonate diethanolamine salt (PFOS-NH(OH)₂, CAS#70225-14-8), Perfluorooctanesulfonic acid, tetraethylammonium salt (PFOS-N(C₂H₅)₄, CAS#56773-42-3), Didecyltrimethylammonium perfluorooctane sulfonate (PFOS(CH₃)₂), CAS#251099-16-8) and Perfluoro-1-octanesulfonyl fluoride (POSF, CAS#307-35-7)



APPENDIX F

MAJOR CHANGES FROM PREVIOUS VERSION

The following summary of main changes is only guidance to help suppliers identify recent updates to the Policy. The Restricted Substances Policy and its Appendices are the standard to which KEEN suppliers must comply.

SECTION	CHANGES
General	Updated letter from CEO to place emphasis on voluntary restrictions
	Changed document title from v2021 to v2022
	Added AFIRM Packaging RSL in KEEN Chemical Management Policy
I. Introduction	Added AFIRM Packaging RSL in KEEN Chemical Management Policy, update AFIRM RSL version and Links
VII. General Testing Procedure	Table 5 technical updates include the following: <ul style="list-style-type: none">i. Added remark "Usage ban for KEEN components" for Polycarbonate material due to strict BPA contamination restrictions and concernsii. Increased risk level for Bisphenols. All materials including fibers, artificial leather, natural material, polycarbonate, coatings and glues are considered a Level 1 risk due to high incidence of contaminationiii. Added Butylhydroxytoluene (BHT) requirement for all other plastic and polymers as Level 2 due to high incidence of contamination and known health risksiv. Increased risk level for Chlorophenols, synthetic fiber and blended fiber will be considered as level 1 due to high incidence of contamination from the dyeing process of textilesv. Increased risk level for Flame Retardant, material using Flame Retardant and wool considered as level 1 due to high incidence of contaminationvi. Packaging has been added for Heavy Metals and revised remark "H" in Test Matrixvii. Revised PAHs test requirements on Coatings & Prints to include all colors in scope due to high incidence of contamination
VIII. Product Compliance	Updated Approved Third Party Testing Lab contact information
Appendices	Added APPENDIX E - PFAS List of Restricted Substance