CHEMICAL POLICY & RESTRICTED SUBSTANCE LIST
VERSION 2023






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

WHY THIS POLICY?

ENABLE CONTINUOUS ADVANCEMENT OF CHEMICAL MANAGEMENT BEST PRACTICES

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

KEEN's Chemical Policy & Restricted Substances List ("Policy") integrates substances we voluntarily restrict in our product. These voluntary restrictions are clearly outlined in Section II and depicted in Testing Matrix (see Table 6). In addition to voluntary restrictions, the Policy is based on the strictest global regulations regarding 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 the continuous advancement of chemical management best practices. We are taking a proactive stance on specific classes of chemicals voluntarily restricted in our products and replacing them with safe, effective and affordable alternatives suitable for our sourcing requirements. These voluntary restrictions are clearly outlined in Section II below and depicted in the KEEN Testing Matrix.

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, KEEN

Table of Contents

I. Introduction

KEEN's Chemical Policy & Restricted Substances List ("Policy") is based on substances we voluntarily restrict in our product. These voluntary restrictions are clearly outlined below. In addition to voluntary restrictions, the Policy is in line with AFIRM RSL Version 8 v2023 (www.afirm-group.com/afirm-rsl/) and Packaging RSL Version 5 v2022 (https://afirm-group.com/packaging-restricted-substance-list/). In some cases, the Policy go further as depicted in the KEEN Testing Matrix (Table 6).

II. Voluntary Chemical Phase-Outs: Six Classes Chemicals and Fragrance allergens

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 DWR non-wicking treatments and PFAS-free water-proof bootie based on a rigorous 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. **Bisphenols + Phthalates:** Commitment to bisphenol-and-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 the use of mercury, arsenic, cadmium, and lead in production processes

In addition to the Six Class approach, KEEN has a commitment to eliminating **fragrance allergens** in our products. Please refer to Appendix F for a complete list of restricted fragrance allergens.

III. Regulatory Requirements

Specific 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 specific 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 REACH. 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 outlined in the Policy. Suppliers are defined by two major categories:

- **Material Suppliers (Tiers 2-3):** These suppliers provide materials, trims, adhesives, etc., for use in finished products and include textiles, zippers, plastic components, shoelaces & metal parts.

- **Factories (Tier 1):** 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 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:

a. **Standards set forth in the Policy**

b. **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 the 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
Synthetic Coated Fabrics	Textiles with: Polyurethane (PU) Coating, Polyvinyl Chloride (PVC) Coating, and other Polymeric Coatings
Natural Leather & Fur Skin	Leather, Fur Skin and bonded/recycled leather
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, and Shell (e.g. coconut or mother of pearl)
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 **(Factories and Material Suppliers)**
   1. Identify a contact person with 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 them 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 outlined 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 Tier 3-4 raw materials suppliers to ensure raw materials (fiber, dyestuff, chemicals, etc.) comply with the standards outlined 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 outlined 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 outlined in the Materials Supplier Requirements above.
   5. Review test reports from Materials Suppliers and **ensure materials and components comply with the Policy's limits before 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@lkeenfootwear.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 testing required to satisfy requirements, 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 and product categories.

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.

Our goal is to reduce the testing burden and streamline the RSL testing approach, while reducing the 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 for Routine Testing.

VII. General Testing Procedure

Various material types and finished products must be routinely tested for different RSL limits. 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 6 below describe 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 the presence of substances in various material types. KEEN may request additional tests at any time on any material for any RSL substance.

Regarding RSL limits, some restrictions require that substance limits not be exceeded while others require that substance concentrations be below designated limits (e.g., chromium VI must be below 3 ppm to be compliant with EU law). Test results should always be below designated limits to ensure compliance with all market requirements.

Table 3: Material Suppliers Testing Procedure

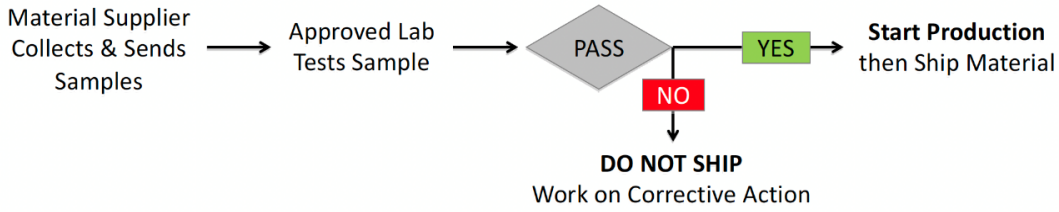


Table 4: Factory Testing Procedure

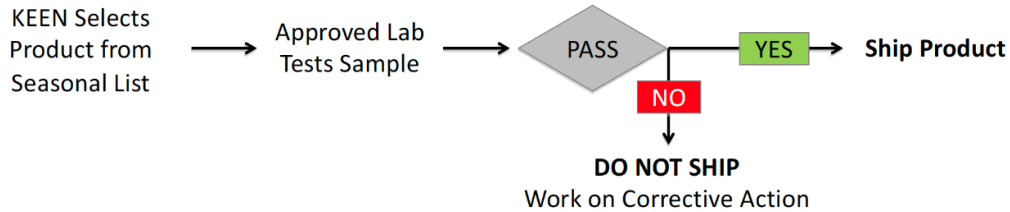


Table 5: Definition of Age*

	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.

Table 6: KEEN RSL Testing Matrix

NOTE: 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	Synthetic Coated Fabrics	Natural Leather & Fur Skin	Natural Materials	Metals	Feathers & Down	Polymers: EVA	PU Foam	All Other PU & TPU	Rubber (Excludes Latex and Silicone Rubbers)	Polycarbonate (Usage ban for KEEN components)	ABS	PVC (Usage ban for KEEN components)	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
Azo-amines and Arylamine salts	1A	1A	1A	1A	1A	1A		1A									1	
Bisphenols		1	1	1	1	1P			2	2	2	2	1	2	2	2		
Butylhydroxytoluene (BHT)																2H		
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		1A	1A	1A													2	
Dyes, Navy Blue		2	2															
Flame Retardants	1B																	
Fluorinated Greenhouse Gases																		
Formaldehyde	1	1	1	2	1	1C						2					1	1
Fragrance allergens	2Q																	
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	
Heavy Metals, Nickel Release							1											
Heavy Metals, Total	2G		2G	1	2		1		1	1	1	1	1	1	1	1	1	2
Package Heavy Metals	1H																	
Monomers, Styrene & Vinyl Chloride				2J								2K		2	1		1J	
N-Nitrosamines												2						
Organotin Compounds		2	2	1	2					1	1	1			1	1	1	1
Ortho-phenylphenol (OPP)	2	2	2	2	2												2	
Ozone-depleting Substances																		
Per- and Polyfluoroalkyl Substances (PFAS)	1L																	
Pesticides, Agricultural																		
Phthalates				1					1	1	1	1	2	2	1	1	1	1
Polycyclic Aromatic Hydrocarbons (PAHs)				1M					1M	1M	1M	1			1M	1M	1	1M
Quinoline		2	2															
Solvents/Residuals, DMFa				1						1	1						1N	1N
Solvents/Residuals, DMAC and NMP				1						2	2					2	2	2
Solvents/Residuals, Formamide									2								2	
UV Stabilizers/ Inhibitors									2	2	2	2	2	2	2	2		
Volatile Organic Compounds (VOCs)				2					2	2	2	2	2	2	2	2	2	1

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.
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.
G Level 2 for plant-based fibers; N/A animal-based fibers
H For Packaging material only
J Level 1 for PVC materials, KEEN banned PVC.

K Level 2 for Styrene/Butadiene Rubbers (SBRs) only.
L Level 1 if PFAS use or contamination suspected; Level 1 for Wool; Level 1 for PU film with "hand feel" finishing.
M Level 1 if Rubber or black Polymeric materials.

N Level 1 for PU-based materials.
P Level 1 for paper and cardboard.
Q Level 2 for material with Fragrance.

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

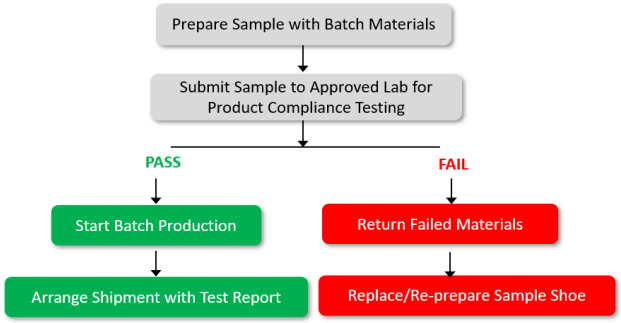
1. **United States**
   Consumer Product Safety Improvement Act (CPSIA) for Children's products

2. **Japan**
   Formaldehyde for Babies (see Table 5) Footwear, Test at SAP level

3. **Turkey**
   Phthalates for all footwear

4. **China**
   GB/T 15107 for footwear at the Model level

Table 7: Standard Operating Procedure for Product Compliance



Note: Must comply with all applicable regulations, not just receive a "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, Tukey, 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 item
   - Turkey: Phthalates Test request a minimal 1.0g for each Test item
   - Japan: Formaldehyde Test request a minimal 2g for each Test item
   - China: Physical and Chemical Test request 2 additional pairs' components

2) Submission Package:

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

3) Sample Send To:

a) **Intertek – Guangzhou, China**

Address: Room 601(Footwear), No.8, East BaoYing Road, Huangpu District, Guangzhou (510730), China
Contact: Ms. Scarlett Wang
Tel: +86 20 28209275
Email: scarlett.xq.wang@intertek.com
Note: For China GB 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) **Intertek – Ho Chi Minh, Vietnam**
Address: 8th and 9th Floor of Lobby D, S.O.H.O Building, No. 38 Huynh Lan Khanh Street, Ward 2, Tan Binh District, Ho Chi Minh City, Vietnam
Contact: Ha Thi Hang (Ms.)
Tel: +84 28 7305 1088 (ext. 154) **Mobile:** +84 909 509 534
Email: hang.ha@intertek.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 by 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 determines, 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. Further actions to be determined by KEEN 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 the 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 provides 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,
- Hold us, as Material Supplier, responsible for any damage caused by the material if it does not follow the chemical policy, and
- 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,
- Hold us, as Factory, responsible for any damage caused by the product if it does not follow the chemical policy, and
- 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 C

RSL FAILURE RESOLUTION FORM (FRF)

PRODUCT TYPE:			**RSL SUBMISSION ID (Failed Report #):**	
☐Footwear ☐Apparel ☐Other:				
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 2023.

Signature Date:

APPENDIX D

RSL AUDITING DOCUMENT

				Supplier Name:	
Supplier RSL Audit				**Total Score:**	
	Supplier RSL Statement (10 Score)	**Yes**	**No**	**Partial (As %)**	**Comments**
1	Supplier has signed and returned KEEN RSL Policy 'Acknowledgement of Compliance with Policy' 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: '_____'			Behalf of KEEN/ROFU: '_____'	
	Title: '_____'			Title: '_____'	
	Date: '_____'			Date: '_____'	

APPENDIX E

PFAS LIST OF RESTRICTED SUBSTANCES

No.	Substances	CAS#	Reporting Limit		Remark
			$\mu g/m^2$	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	1	10	AFIRM Requirement
4	1H,1H,2H,2H-Perfluorodecyl acrylate (8:2 FTA)	27905-45-9	1	10	AFIRM Requirement
5	Methyl perfluorooctanoate (Me-PFOA)	376-27-2	0.4(SGS0.5)	2(SGS2.5)	AFIRM Requirement
6	1H,1H,2H,2H-Heptadecafluorodecyl methacrylate (8:2 FTMA)	1996-88-9	1	10	AFIRM Requirement
7	Ethyl perfluorooctanoate (Et-PFOA)	3108-24-5	0.4(SGS0.5)	2(SGS2.5)	AFIRM Requirement
8	1H,1H,2H,2H-Perfluorodecanesulfonic acid (8:2 FTS)	39108-34-4	0.4	2	AFIRM Requirement
9	Perfluorooctane Sulfonamide (PFOSA)	754-91-6	0.4	2	AFIRM Requirement
10	2-(N-methylperfluoro- 1-octanesulfonamido) - ethanol (MeFOSE)	24448-09-7	0.4	2	AFIRM Requirement
11	2-(N-ethylperfluoro-1-octanesulfonamido)-ethanol (EtFOSE)	1691-99-2	0.4	2	AFIRM Requirement
12	N-methylperfluoro-1-octanesulfonamide (MeFOSA)	31506-32-8	0.4	2	AFIRM Requirement
13	N-ethylperfluoro-1-octanesulfonamide (EtFOSA)	4151-50-2	0.4	2	AFIRM Requirement
14	Perfluorohexane Acid (PFHxA)	307-24-4	0.4	2	AFIRM Requirement
15	Perfluorohexane Sulfonate (PFHxS)	355-46-4	0.4	2	AFIRM Requirement
16	Perfluorohexane Sulfonic acid, potassium salt (PFHxS-K)	3871-99-6	0.4	2	AFIRM Requirement
17	Perfluorohexane Sulfonic acid, lithium salt (PFHxS-Li)	55120-77-9	0.4	2	AFIRM Requirement
18	Perfluorohexane Sulfonic acid, ammonium salt (PFHxS-NH4)	68259-08-5	0.4	2	AFIRM Requirement
19	Perfluorohexane Sulfonic acid, sodium salt (PFHxS-Na)	82382-12-5	0.4	2	AFIRM Requirement
20	N-Methylperfluoro-1-hexanesulfonamide (N-Me-FHxSA)	68259-15-4	0.4	2	AFIRM Requirement
21	Perfluorohexane sulfonamide (PFHxSA)	41997-13-1	0.4	2	AFIRM Requirement
22	Perfluorononane Acid (PFNA)	375-95-1	0.4	2	AFIRM Requirement
23	Perfluorodecane Acid (PFDA)	335-76-2	0.4	2	AFIRM Requirement
24	Perfluoroundecanoic Acid (PFUnA)	2058-94-8	0.4	2	AFIRM Requirement
25	Perfluorododecanoic Acid (PFDoA)	307-55-1	0.4	2	AFIRM Requirement
26	Perfluorotridecanoic Acid (PFTrA)	72629-94-8	0.4	2	AFIRM Requirement
27	Perfluorotetradecanoic Acid (PFTeA)	376-06-7	0.4	2	AFIRM Requirement
28	Perfluoro-3,7-dimethyloctanoic Acid (PF-3,7-DMOA)	172155-07-6	0.4	2	AFIRM Requirement
29	2H,2H-Perfluorodecane Acid (H2PFDA)	27854-31-5	0.4	2	AFIRM Requirement
30	2H,2H,3H,3H-Perfluoroundecanoic Acid (H4PFUnA)	34598-33-9	0.4	2	AFIRM Requirement
31	1H,1H,2H,2H-Perfluorododecylacrylate (10:2 FTA)	17741-60-5	1	10	AFIRM Requirement
32	1H,1H,2H,2H-Perfluorododecyl methacrylate (10:2 FTMA)	2144-54-9	1	10	AFIRM Requirement
33	1H,1H,2H,2H-Perfluoro -1-dodecanol (10:2 FTOH)	865-86-1	1	10	AFIRM Requirement
34	1H,1H,2H,2H-perfluorotetradecan-1-ol (12:2 FTOH)	39239-77-5	1	10	AFIRM Requirement
35	1H,1H,2H,2H-Perfluorododecanesulphonic acid (10:2 FTS)	120226-60-0	1	10	AFIRM Requirement
36	1H,1H,2H,2H-Perfluorododecyl iodide (10:2 FTI)	2043-54-1	1	10	AFIRM Requirement
37	1H,1H,2H,2H-Perfluorotetradecyl iodide (12:2 FTI)	30046-31-2	1	10	AFIRM Requirement
38	1H,1H,2H,2H-Perfluorodecyl iodide (8:2 FTI)	2043-53-0	1	10	KEEN Requirement
39	Perfluorooctylethene	21652-58-4	1	10	KEEN Requirement
40	2,3,3,3-tetrafluoro-2-(heptafluoropropoxy) propionic acid, its salts and its acyl halides	13252-13-6	0.4	2	KEEN Requirement
41	1H, 1H, 2H, 2H-Perfluorohexanesulfonic Acid (H4-PFGxS(4:2 FTS))	757124-72-4	0.4	2	KEEN Requirement
42	N-(Perfluoro-1-octanesulfonyl) Glycine	2806-24-8	0.4	2	KEEN Requirement
43	N-Methylperfluoro-1-octanesulfonamidoacetic Acid	2355-31-9	0.4	2	KEEN Requirement
44	N-Ethyl-N-(perfluoro-1-octanesulfonyl) Glycine	2991-50-6	0.4	2	KEEN Requirement
45	Perfluorooctyl iodide (PFOI)	507-63-1	1	10	KEEN Requirement
46	Perfluorobutane Acid (PFBA)	375-22-4	0.4	2	KEEN Requirement
47	Perfluorobutane Sulfonate (PFBS)	375-73-5	0.4	2	KEEN Requirement
48	Perfluoropentane Acid (PFPA)	2706-90-3	0.4	2	KEEN Requirement
49	Perfluoroheptane Acid (PFHpA)	375-85-9	0.4	2	KEEN Requirement
50	Perfluoroheptane Sulfonate (PFHpS)	375-92-8	0.4	2	KEEN Requirement
51	Perfluorodecane Sulfonate (PFDS)	126105-34-8	0.4	2	KEEN Requirement
52	7H-Dodecanefluoroheptane Acid (HPFHpA)	1546-95-8	0.4	2	KEEN Requirement
53	Perfluorooctanesulphonic acid 1H,1H,2H,2H (H4PFOS; 6:2)	27619-97-2	0.4	2	KEEN Requirement
54	1H,1H,2H,2H-Perfluorooctylacrylate (6:2 FTA)	17527-29-6	1	10	KEEN Requirement
55	1H,1H,2H,2H-Perfluoro-1-hexanol (4:2 FTOH)	2043-47-2	1	10	KEEN Requirement
56	1H,1H,2H,2H-Perfluoro-1-octanol (6:2 FTOH)	647-42-7	1	10	KEEN Requirement
57	All PFAS as measured by Total Fluorine	/	/	50,000	AFIRM 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, CAS#1763-23-1), 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), Didecyldimethylammonium perfluorooctane sulfonate (PFOS(CH3)2), CAS#251099-16-8) and Perfluoro-1-octanesulfonyl fluoride (POSF, CAS#307-35-7)

APPENDIX F

FRAGRANCE ALLERGENS LIST OF RESTRICTED SUBSTANCES

No.	Substances	CAS#	KEEN Limit (mg/kg)	Reporting Limit (mg/kg)	Remark
1	Benzyl alcohol	100-51-6	100	10	Test Requested
2	Limonene (d-Limonene)	5989-27-5	100	10	Test Requested
3	Linalool	78-70-6	100	10	Test Requested
4	Methyl 2-octynoate (Methyl heptine carbonate)	111-12-6	100	10	Test Requested
5	Citronellol	106-22-9	100	10	Test Requested
6	Citral	5392-40-5	100	10	Test Requested
7	Geraniol	106-24-1	100	10	Test Requested
8	Cinnamal	104-55-2	100	10	Test Requested
9	Anisyl alcohol	105-13-5	100	10	Test Requested
10	Hydroxy-citronellal	107-75-5	100	10	Test Requested
11	Cinnamyl alcohol	104-54-1	100	10	Test Requested
12	Eugenol	97-53-0	100	10	Test Requested
13	Isoeugenol	97-54-1	100	10	Test Requested
14	Coumarin	91-64-5	100	10	Test Requested
15	Alpha-isomethyl lonone (3-methyl-4-(2.6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one)	127-51-5	100	10	Test Requested
16	Butylphenyl methylpropional (Lilial)	80-54-6	100	10	Test Requested
17	Amyl cinnamal	122-40-7	100	10	Test Requested
18	Hydroxy-methylpentylcyclohexene carboxaldehyde	31906-04-4	100	10	Test Requested
19	Amylcinnamyl alcohol	101-85-9	100	10	Test Requested
20	Farnesol	4602-84-0	100	10	Test Requested
21	Hexyl cinnamaldehyde	101-86-0	100	10	Test Requested
22	Benzyl benzoate	120-51-4	100	10	Test Requested
23	Benzyl salicylate	118-58-1	100	10	Test Requested
24	Benzyl cinnamate	103-41-3	100	10	Test Requested
25	Alanroot oil (Inula helenium)	97676-35-2	100	NA	Document Review
26	Allylisothiocyanate	57-06-7	100	NA	Document Review
27	Benzyl cyanide	140-29-4	100	NA	Document Review
28	4 tert-Butylphenol	98-54-4	100	NA	Document Review
29	Chenopodium oil	8006-99-3	100	NA	Document Review
30	Cyclamen alcohol	4756-19-8	100	NA	Document Review
31	Diethyl maleate	141-05-9	100	NA	Document Review
32	Dihydrocoumarin	119-84-6	100	NA	Document Review
33	2,4-Dihydroxy-3-methylbenzaldehyde	6248-20-0	100	NA	Document Review
34	3,7-Dimethyl-2-octen-1-ol (6,7-Dihydrogeraniol)	40607-48-5	100	NA	Document Review
35	4,6-Dimethyl-8-tert-butylcoumarin	17874-34-9	100	NA	Document Review
36	Dimethyl citraconate	617-54-9	100	NA	Document Review
37	7,11-Dimethyl-4.6,10-dodecatrien-3-one	26651-96-7	100	NA	Document Review
38	6,10-Dimethyl-3.5,9-undecatrien-2-one	141-10-6	100	NA	Document Review
39	Diphenylamine	122-39-4	100	NA	Document Review
40	Ethyl acrylate	140-88-5	100	NA	Document Review
41	Fig leaf, fresh and preparations	68916-52-9	100	NA	Document Review
42	Trans-2-Heptenal	18829-55-5	100	NA	Document Review
43	Trans-2-Hexenal diethyl acetal	67746-30-9	100	NA	Document Review
44	Trans-2-Hexenal dimethyl acetal	18318-83-7	100	NA	Document Review
45	Hydroabietyl alcohol	13393-93-6	100	NA	Document Review
46	4-Ethoxy-phenol	622-62-8	100	NA	Document Review
47	6-Isopropyl-2-decahydronaphthalenol	34131-99-2	100	NA	Document Review
48	7-Methoxycoumarin	531-59-9	100	NA	Document Review
49	4-Methoxyphenol	150-76-5	100	NA	Document Review
50	4-(p-Methoxyphenyl)-3-butene-2-one	943-88-4	100	NA	Document Review
51	1-(p-Methoxyphenyl)-1-penten-3-one	104-27-8	100	NA	Document Review
52	Methyl trans-2-butenoate	623-43-8	100	NA	Document Review
53	6-Methylcoumarin	92-48-8	100	NA	Document Review
54	7-Methylcoumarin	2445-83-2	100	NA	Document Review
55	5-Methyl-2,3-hexanedione	13706-86-0	100	NA	Document Review
56	Costus root oil (Saussurea lappa Clarke)	8023-88-9	100	NA	Document Review
57	7-Ethoxy-4-methylcoumarin	87-05-8	100	NA	Document Review
58	Hexahydrocoumarin	700-82-3	100	NA	Document Review
59	Peru balsam, crude (Exudation of Myroxylon pereirae (Royle) Klotzsch)	8007-00-9	100	NA	Document Review
60	2-Pentylidene-cyclohexanone	25677-40-1	100	NA	Document Review
61	3.6,10-Trimethyl-3.5,9-undecatrien-2-one	1117-41-5	100	NA	Document Review
62	Verbena oil (Lippia citriodora Kunth)	8024-12-2	100	NA	Document Review
63	Musk ambrette (4-tert-Butyl-3-methoxy-2,6-dinitrotoluene)	83-66-9	100	NA	Document Review
64	4-Phenyl-3-buten-2-one	122-57-6	100	NA	Document Review
65	Oakmoss extracts	90028-68-5	100	NA	Document Review
66	Treemoss extracts	90028-67-4	100	NA	Document Review

Notes:
1. "NA" means not applicable.
2. "Test Requested" means if material with fragrance/scents treatment, material will be requested to conduct test.
3. "Document Review" means if material with fragrance/scents treatment, supplier should provide MSDS/TDS of fragrance/scents to KEEN RSL Team for review.

APPENDIX G

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 v2022 to v2023
I. Introduction	Updated AFIRM RSL version and Links
II. Voluntary Chemical Phase-Outs	Added Fragrance allergens in Voluntary Chemical Phase-Outs
VII. General Testing Procedure	Table 6 technical updates include the following: - Revised risk level for Bisphenols to align with AFIRM RSL; added remark "P" to clarify paper and cardboard, which in Natural Materials will be considered as level 1 material. Effective from SS24 - Revised risk level for Flame Retardants, all materials with flame resistance treatment, will be considered as level 1. Effective from SS24 - Added Fragrance allergens requirement for those materials with fragrance treatment due to consumer human health concerns. Effective from SS24
VIII. Product Compliance	Updated Approved Third Party Testing Lab contact information
Appendices	- APPENDIX E, updated PFAS List and Reporting Limit - Added APPENDIX F - Fragrance allergens List of Restricted Substance