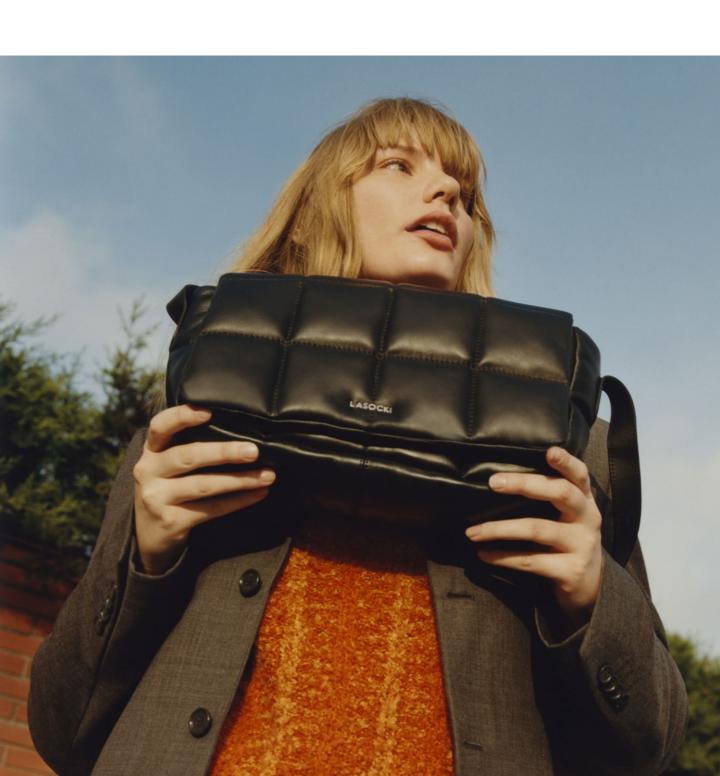


# **CCC GROUP**SUPPLIER CODE OF CONDUCT







### **SECTIONS**

- I. INTRODUCTION
- II. PRINCIPLES OF THE CODE
  - **MECHANISMS**
- III. FOR OVERSEEING COMPLIANCE WITH THE PROVISIONS OF THE CODE
- IV. MONITORING AND UPDATING MECHANISM
  - V. CODE OF CONDUCT IMPLEMENTATION
- VI. ATTACHMENTS







# Section I

# INTRODUCTION

| 1.1. | PURPOS | SE AND SCOPE OF APPLICATION                 | 5 |
|------|--------|---|---|
|      | 1.1.1. | Purpose                                     | 5 |
|      | 1.1.2. | Scope of application                        | 5 |
|      | 1.1.3. | Responsibility for the Code                 | 5 |
|      | 1.1.4. | Basis of the Code                           | 6 |
|      | 1.1.5. | Code of Ethics and Supplier Code of Conduct | 6 |





#### 1.1. PURPOSE AND SCOPE OF APPLICATION

#### 1.1.1. Purpose

The purpose of this CCC Group Supplier Code of Conduct, hereinafter referred to as the 'Code', is to establish high standards and practices across all ESG areas to be shared within the CCC Group's supply chain. At the CCC Group, we follow the best practices of due diligence with respect to business ethics. Our goal is to make sure that all actors within our value chain operate with due regard to the need to protect the environment, provide decent working conditions and foster ethical business conduct.

Suppliers play a pivotal role within the Group's value chain. We want to continually strengthen our Supplier relations to strive together for the highest standards of ethical business conduct.

At CCC, the fundamental internal policy on ethics is the CCC Group Code of Ethics. Our ambition is to ensure that every entity covered by this Code manages its ethics function in a manner consistent with the principles set forth in the CCC Group Code of Ethics.

We are aware of the Group's responsibility to support Suppliers in raising the bar on standards and capabilities; to that end, we want this Code to serve as a reference for our Suppliers. Should our Suppliers have any queries regarding this Code or need further guidance or support to ensure compliance, they are encouraged to contact us directly.

#### 1.1.2. Scope of application

The provisions of this Supplier Code of Conduct apply to all entities that are Suppliers of the CCC Group.

A Supplier is any entity that has entered into a written contract and/or signed a purchase order with CCC SA or any subsidiary of the CCC Group under which it supplies merchandise, non-commercial goods and/or services covered by such contract and/or order.

Suppliers undertake to comply with the provisions of this Supplier Code of Conduct by submitting a Declaration of Compliance with the Code (Schedule 6.2.). Key Suppliers undertake to comply with the provisions of this Supplier Code of Conduct and agree to undergo an Ethics Audit and submit to other mechanisms provided for herein by submitting a Key Supplier Statement of Compliance with the CCC Group Supplier Code of Conduct (Schedule 6.3.).

#### 1.1.3. Responsibility for the Code

The organisational units responsible for overseeing the content of this Code and for implementing procedures for communicating this Code are the CCC Group's units that evaluate and select Suppliers. The organisational unit responsible for overseeing the process of handling Code violation reports is the Compliance Officer.





The CCC Group business unit that works with a Supplier is responsible for receiving from that Supplier an acknowledgement to the effect that the Supplier has read and will comply with the provisions of this Code.

#### 1.1.4. Basis of the Code

The provisions of the CCC Group Supplier Code of Conduct are based on the legal standards and international guidelines recognised as a source of best practices for ethical business conduct:

- Universal Declaration of Human Rights;
- Charter of Fundamental Rights of the European Union;
- Ten Principles of the United Nations Global Compact;
- ILO (International Labour Organisation) Conventions, including (but not limited to): Forced Labour Convention No. 29, Minimum Age Convention No. 138;
- OECD Guidelines for Multinational Enterprises;
- UN Guiding Principles on Business and Human Rights.

The above guidelines and standards form the basis for ethical conduct in the CCC Group's own operations. We expect our Suppliers to be guided by the very same values in their respective business operations.

In addition, we expect our suppliers of goods (products) to comply with the regulations and guidelines contained in the Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals ("REACH Regulation").

#### 1.1.5. Code of Ethics and Supplier Code of Conduct

The CCC Group Code of Ethics is the document underlying ethics management across the CCC Group. Elements of the CCC Group Code of Ethics are an important reference point for other ethics-related Policies and Procedures. The Code of Ethics provides for:

- Responsibility for ethics management and the procedure for appointing the Ethics Officer:
- The CCC Group's mission, vision and values;
- Values and principles that the recipients of the CCC Group Code of Ethics have committed to respect;
- Procedure for reporting violations of adopted values;

The CCC Group's mission, vision and values form the basis underlying the provisions of this Supplier Code of Conduct. In the case of those principles of ethical conduct which, if violated, have a particular impact on workplace safety, the definitions presented in the Code of Ethics are followed by specific examples.



Click on the link below to access the content of the CCC Group Code of Ethics.





## Section II

# PRINCIPLES OF THE CODE

| 2.1. | EMPLO  | YMENT PRACTICES AND STANDARDS          | 9  |
|------|--------|--|----|
|      | 2.1.1. | Prohibition of child labour            | 9  |
|      | 2.1.2. | Prohibition of forced labour           | 9  |
|      | 2.1.3. | Non-discrimination and diversity       | 10 |
|      | 2.1.4. | Occupational health and safety         | 11 |
|      | 2.1.5. | Working conditions: fair working hours | 11 |
|      | 2.1.6  | Fair remuneration                      | 12 |
|      | 2.1.7  | Right of association                   | 12 |
| 2.2. | CORPC  | DRATE ETHICS                           | 13 |
|      | 2.2.1  | Anti-corruption                        | 13 |
|      | 2.2.2  | Personal data protection               | 13 |
|      | 2.2.3  | Information security                   | 13 |
| 2.3. | ENVIRO | DNMENTAL POLICY                        | 13 |
| 2.4. | PROHIE | BITED SUBSTANCES AND POLLUTANTS        | 15 |
| 2.5. | DEFO   | RESTATION                              | 17 |





This Section describes the principles of ethical conduct which require to be followed by all our Suppliers. The requirement to comply with these principles arises from the CCC Group's mission and vision, as well as from generally accepted standards and regulations.

Our Suppliers are required to become familiar with the principles described in this Section. If there is a requirement to implement a specific management method, Suppliers are obliged to meet that requirement. The recommendations given in this Section are a source of good ESG practices. A failure to comply with any of the principles listed in this Section may be reported through the violation reporting system described in Section 3 and result in taking corrective action or in terminating the relationship with the Supplier in question.

If the Code contains provisions applying to specific activities in which a particular Supplier does not engage, such provisions shall not apply to that Supplier.

#### 2.1. EMPLOYMENT PRACTICES AND STANDARDS

#### 2.1.1. Prohibition of child labour

# SUPPLIERS ARE EXPECTED NOT TO EMPLOY CHILDREN AND NOT TO TOLERATE CHILD LABOUR

In accordance with ILO Convention No. 138 on Minimum Age, the minimum age of a Supplier's employee must not be lower than the age at which a child leaves compulsory education, and in any case not lower than 15 years. The Charter of Fundamental Rights states that the employment of children is prohibited.

#### **JUVENILES ALLOWED TO WORK**

Suppliers are obliged to ensure that juveniles allowed to work have working conditions appropriate to their age and be protected against economic exploitation and from any work likely to harm their safety, health or physical, mental, moral or social development or to interfere with their education. Suppliers should carry out OHS risk assessments from the perspective of juvenile workers and adjust working time to the specific needs of that group.

#### 2.1.2. Prohibition of forced labour

#### WE DO NOT TOLERATE FORCED LABOUR

Every Supplier is obliged to ensure decent conditions of employment and comply with the following basic principles to prevent forced labour:

- each employee must be employed of their own free will, based on a contract governing the employment relationship in their country,
- a Supplier shall not use any form of threat or coercion against any employee,
- in the case of persons employed by an employment agency or outsourcing company, employees must not be indebted to such employment agency or outsourcing company,
- employees must have an option to terminate their employment relationship with a Supplier with a reasonable notice period,





- a Supplier shall not retain any identification documents of employees,
- a Supplier shall not control or restrict the free movement of employees outside of working hours,
- a Supplier shall not require any deposits from employees for the use of work equipment or production machinery, or any other deposits for the use of equipment necessary to perform their work.

#### WHAT IS FORCED LABOUR?

In accordance with ILO Convention No. 29, forced or compulsory labour means all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered herself or himself voluntarily. The following are examples of work or service that qualifies as forced labour: provision of work or services involving exploitation, or coerced by violence, threat, deprivation of freedom, demand to work off debt, retention of an identity document, travel document, or document authorising a foreigner to stay in the territory of the country where work is performed, non-payment of remuneration, or any other violation of employee rights.

#### 2.1.3. Non-discrimination and diversity

#### ABUSE PREVENTION

We require our Suppliers to create a work environment that is free from any discrimination, workplace bullying and sexual harassment. Discrimination on grounds of race, skin colour, language, nationality, social background and ethnic origin, religious denomination, political views, gender, marital status, disability, financial situation, age, sexual orientation, or trade union membership, is unacceptable. Suppliers should ensure:

- a non-discriminating recruitment process based solely on an objective assessment of the qualifications of candidates,
- an internal whistleblowing system supported by a dedicated unit,
- a whistleblower protection system so that an employee who reports a violation is not subject to any retaliatory action,
- suppliers shall not allow any of the above factors to affect an employee's chances of promotion, development and access to employee benefits.

#### **DIVERSITY INITIATIVES**

The CCC Group believes that team diversity is a source of competitive advantage and that confrontation of different views, opinions, work styles, skills and experiences produces new quality and creates conditions leading to stronger business performance.





Our Suppliers should strive to ensure an optimum degree of workforce diversity. We encourage our Suppliers to examine their workforce structure in terms of the proportions of male and female workers across all job grades and to consider implementing their own Diversity Management Policies.

#### 2.1.4. Occupational health and safety

Our Suppliers are obliged to provide a safe and comfortable work environment and to have in place an occupational health and safety management system.

At the workplace, Suppliers should provide:

- · Adequate lighting and ventilation;
- Personal protective equipment at each workstation where maximum admissible concentrations (MAC) or maximum admissible intensities (MAI) are exceeded;
- Access to running water;
- Adequate sanitary facilities:
  - o Restrooms with running water, ensuring privacy and separated into restrooms for men and women,
  - o Staff amenities where employees can eat meals in hygienic conditions,
- Adequate facilities and procedures to be followed in case of fire or other emergency events posing a danger to employees:
  - Appropriate training;
  - o Evacuation routes on the premises;
  - Access to first aid supplies;
- Protective clothing / equipment, if required at a given workstation;
- Occupational health and safety training suitable for a given workstation.

It is also a Supplier's responsibility to ensure compliance with the OHS requirements applicable under the laws of the country where the Supplier is located.

#### 2.1.5. Working conditions: fair working hours

Our Suppliers are required to have a fair approach to employee working time management. In determining the length of a workday and the number of workdays per week, Suppliers agree to comply with the local laws and provisions of collective bargaining agreements. Overtime must be regulated and awarded fairly depending on demand. Employees should receive adequate compensation for overtime work in accordance with the local laws.

Employees should have the right to refuse to work overtime without any repercussions. Each employee should be entitled to holiday and sick leave as per the applicable local laws.





#### 2.1.6. Fair remuneration

Our Suppliers are obliged pay to their employees remuneration that is consistent with the industry standard for the relevant position and is not lower than the local minimum wage. Suppliers must inform their employees in a clear and comprehensible manner about the amount of remuneration (if so permitted under the local laws), remuneration components, number of working hours, overtime pay rates, pay day, and employee benefits. Employers agree to pay remuneration in a timely manner, at least on a monthly basis. Employees should be able to exercise all employee rights and take advantage of all employee amenities provided for in the local laws, such as holiday or sick leave.

The minimum remuneration paid by a Supplier should be sufficient for an employee and their family to meet basic needs.

In many cases, a living wage is considered to be higher than the minimum wage set forth in local laws.

#### 2.1.7. Right of association

Our Suppliers are obliged to ensure freedom of communication on matters relating to the terms and conditions of employment by their employees. Suppliers shall respect the employees' right to form or join trade unions, refrain from influencing the election of trade union representatives, and actively engage in dialogue and communication with trade unions. As employers, our Suppliers are obliged to notify and consult with trade unions any significant organisational changes.

#### WHAT CONSTITUTES A VIOLATION OF FREEDOM OF ASSOCIATION?

Examples of violations in this area include:

- Discouraging workers from joining trade unions;
- · Intimidating employees and anti-union behaviour;
- Promoting employer-dominated structures and worker engagement mechanisms and unfair labour practices;
- Refusing to negotiate in good faith;
- Effect of short-term contracts and other forms of temporary contracts and informal employment on employees' ability to organise themselves into unions;
- Systematic or organised objection and hostility of the employer towards trade unions.





#### 2.2. CORPORATE ETHICS

#### 2.2.1. Anti-corruption

We shall not tolerate any form of corruption, and we require our Suppliers to have the same approach. Suppliers are advised to adopt an Anti-Corruption Policy outlining the rules of conduct to be followed by employees and instructions on how to proceed when a corruption incident is identified or suspected.

At the CCC Group, the relevant document is the CCC Group Anti-Corruption Code available at <a href="https://corporate.ccc.eu/en/policies-and-presentations">https://corporate.ccc.eu/en/policies-and-presentations</a>.



#### 2.2.2. Personal data protection

The protection of personal data is a fundamental obligation of the CCC Group and every Supplier covered by this Code.

We recommend that each Supplier adopt a Personal Data Protection Policy, which should meet all legal requirements of the local laws.

- Suppliers should ensure a maximum level of security for the storage of personal data.
   The Personal Data Protection Policy should include a procedure to be followed by employees.
- The Personal Data Protection Policy should include instructions on how to destroy collected personal data in a secure manner.
- Suppliers should use personal data in a manner governed by the relevant agreements with entities from whom such data was obtained.

#### 2.2.3. Information security

To ensure the security of confidential information, Suppliers are advised to investigate the risks associated with the handling of sensitive information and to implement appropriate data leak prevention measures. Suppliers addressing the area of information security in their own organisation are advised to focus specifically on cyber security and to implement due diligence procedures in that area.

#### 2.3. ENVIRONMENTAL POLICY

Care for the natural environment is one of the cornerstones of the CCC Group's responsible business. We expect our Suppliers to likewise comply with the principles of due diligence in this area. We recommend that our Suppliers adopt an Environmental Policy providing, as a minimum, for the following commitments:

#### **Environmental protection**

Suppliers shall comply with the applicable regulations on environmental protection, reasonable use of natural resources, and continual improvement of environmental protection measures.





#### Climate change prevention

Suppliers shall take action to reduce greenhouse gas emissions, in particular by improving energy efficiency of their production processes, eliminating the combustion of fuels generating greenhouse gas emissions, and using renewable energy sources, especially low- or zero-emission sources such as solar photovoltaic and wind power. As part of their adopted Environmental Policy, Suppliers shall measure their Scope 1 and Scope 2 carbon footprint according to the methodology set forth in the <u>GHG Protocol</u> standard.

#### Water and wastewater management

Suppliers shall minimise their water consumption and manage water resources efficiently. Suppliers shall identify sources of wastewater discharge and monitor their emissions in keeping with the applicable regulations. As wastewater generated during hide tanning, dyeing and finishing of textile products may contain substances that are potentially harmful to the environment and to human and animal health, Suppliers shall ensure that wastewater is properly treated before discharge.

#### Circular economy

Suppliers shall manage resources economically and rationally, minimise the volume of waste generated during production and assembly processes (including packaging waste), manage waste in accordance with the applicable regulations and, where possible, use secondary raw materials in production processes and use raw and other materials that can be recycled after the product life cycle ends.

CCC has introduced a ban on ordering natural fur, as defined under the Fur Free Retailer declaration, for the CCC Group's collections.

#### Chemicals management

Suppliers shall use chemicals efficiently and in compliance with the law. They shall identify and manage the risks associated with the use of hazardous chemicals, taking into account the health of employees, footwear and clothing users and local communities, and the environmental impacts. The CCC Group does not accept any products that contain restricted substances identified by the European Chemicals Agency and ZDHC.

Suppliers shall use, store and dispose of chemicals in an appropriate manner.

#### Management of air emissions of substances other than greenhouse gases

Suppliers shall manage their air emissions (aerosols, volatile organic compounds etc.). They shall take care to protect employees, their families and local communities from the negative impact of such emissions. The Policy should also assign responsibility for environmental and climate change matters within a Supplier's organisation.

The CCC Group expects its Suppliers to cooperate and engage in dialogue as part of a joint effort to manage environmental impacts. As part of this cooperation, the parties shall disclose to each other their respective environmental impacts to best meet the expectations of regulators and investors. For more information, see subsection 3.3 Disclosures.







#### 2.4. PROHIBITED SUBSTANCES AND POLLUTANTS

Harmful substances from consumer goods, such as footwear or clothing, might transfer to the user's body through his or her skin where they can trigger an undesirable reaction. That is why numerous substances have been banned in Europe or given a limit restricting their concentration in a product.

Suppliers of chemical substances, their preparations and articles (goods) made from them may be subject to obligations under the REACH Regulation. The supplier's obligations will depend on the volume of trade in the substance and the supplier's place and role in the supply chain. These may include, but are not limited to:



- Registration of individual substances with the European Chemicals Agency or the Bureau of Chemical Substances.
- Registration of on-site isolated intermediates with the European Chemicals Agency,
- Provision of a safety data sheet to the recipient,
- Information obligations arising from the presence in articles (goods) of substances on the list of dangerous substances or the candidate list of substances of very high concern (SVHC),
- Informing employees about the risks of working with dangerous substances or preparations,
- Compliance with instructions issued by the European Chemicals Agency and its subordinates.





Suppliers of merchandise are committed to guarantee and verify that none of the goods supplied contain any prohibited substances and pollutants or, in the case of statutory provisions, do not exceed the limiting values from the lists of restricted substances governed by the European Chemicals Agency on the basis of the REACH Regulation and ZDHC.

All goods that are supplied, including packaging and, if applicable, booklets and/or other parts, must adhere to all national and European laws, regulations, directives and guidelines that are in effect at the time of the delivery.

The Supplier undertakes to test all materials which are used in commercial goods by an accredited testing laboratory.

The Supplier must test every model per color of goods. Only accredited testing laboratories guarantee that the tests will be carried out in accordance with international standards. The test is carried out at the supplier's cost.

The examples of addresses of accredited laboratories is included in Appendix No. 6.4 of this Code.

The test results have to be made automatically accessible to CCC.

Only footwear and clothing with the test result "PASS" may be shipped. CCC will not pick up any batch without the "PASS" test received before date of shipment. https://echa.europa.eu/pl/substances-restricted-under-reach

https://www.roadmaptozero.com/input#msrl







#### 2.4. DEFORESTATION

#### **CCC Group Suppliers' Obligations Regarding Forest Conservation**

Suppliers of the CCC Group are required to take all necessary actions to prevent illegal deforestation and forest degradation in areas from which they source forest-based products (including soy, palm oil, timber, rubber, cocoa, coffee, and their derivatives). We require that products do not contribute to deforestation and are produced in compliance with the applicable laws of the relevant country.

#### **Origin of Raw Materials**

Suppliers must monitor the sourcing of forest-based raw materials within their supply chains in accordance with applicable laws and in a manner that does not contribute to deforestation after December 31, 2020.

#### **Due Diligence Assessments**

Suppliers shall identify and verify the origin of raw materials in their supply chains under this code, including through:

- identifying and locating the supplier, with special attention to high deforestation-risk areas and countries,
- determining the production plot number and location using navigation systems (where applicable),
- cooperating with local authorities and communities, and conducting audits of lower-tier suppliers.

#### Certification

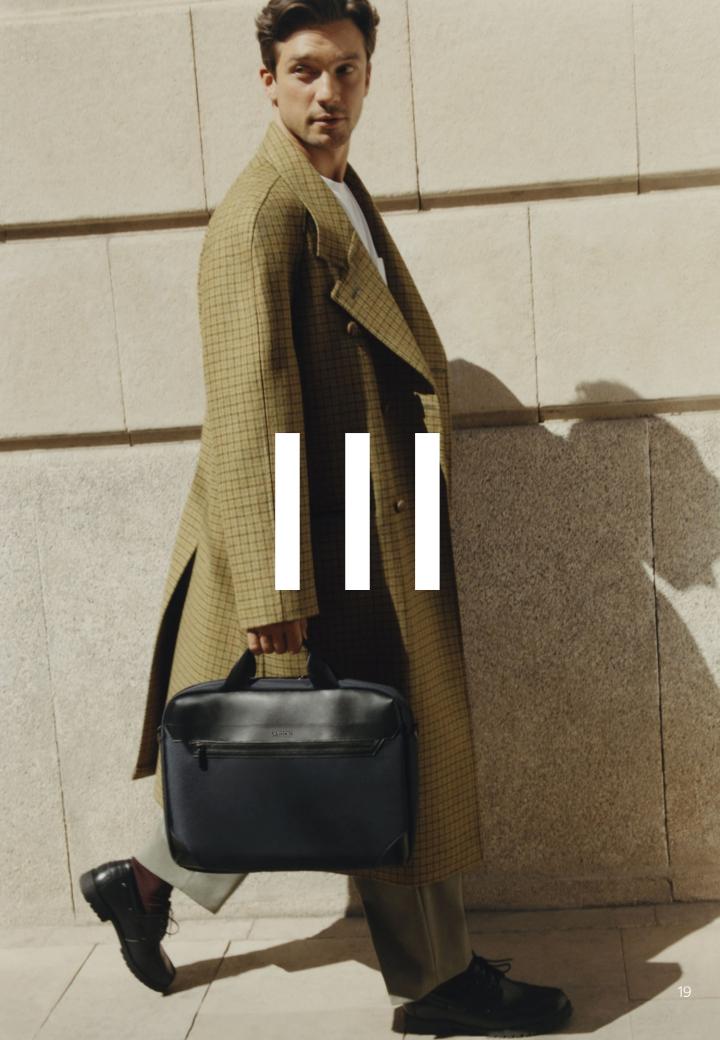
Suppliers shall document the origin of relevant goods by collecting appropriate permits and certificates (e.g., FSC, RSPO, Rainforest Alliance). However, possessing such documentation does not release the supplier from the obligation to exercise due diligence.

#### Reporting

Upon request from CCC, suppliers are required to provide certificates and information that enables verification of the accuracy of the provided data.









Section III

MECHANISMS

FOR OVERSEING

COMPLIANCE

WITH THE PROVISIONS OF THE CODE

| 3.1. | SUPPLIER EVALUATION                               | 21 |
|------|---|----|
| 3.2. | AUDIT   | 21 |
| 3.3. | DISCLOSURES                                       | 21 |
| 3.4. | CONTACT IN MATTERS RELATED TO THE CODE OF CONDUCT | 21 |





In order to ensure compliance with the provisions of this Code, the CCC Group introduces a number of mechanisms that constitute a system ensuring due diligence within the supply chain.

#### 3.1. Supplier evaluation

The CCC Group ensures an objective Supplier evaluation process based on the CCC Group's internal procedures. ESG criteria are integrated into the evaluation process.

#### 3.2. **Audit**

Together with our Suppliers we want to create a sustainable and responsible value creation system. Our ambition is to meet the best practices of due diligence in terms of compliance with the principles of ethics and other obligations under the Code within the supply chain.

Selected Key Suppliers are subject to an Ethics Audit, and a decision to carry out such Audit is based on the CCC Group's internal procedures. If selected, Key Suppliers will be duly notified and required to undergo an Ethics Audit.

#### 3.3. Disclosures

The CCC Group has the ambition to assess the environmental and social impacts along its value chain. Impact assessment is not possible without Key Suppliers, being a key link of the value chain. In order to measure our impact, we aim to establish indepth partnerships with Key Suppliers. Key Suppliers may be asked to make disclosures about their organisation through a dedicated system or, where justified by extraordinary circumstances, directly to the CCC Group.

#### 3.4. Contact in matters related to the Code of Conduct

The CCC Group wants to provide Suppliers with an option to report violations of this Code of Conduct.

#### We have set up a separate email inbox for this purpose: etyka@ccceu

Any violations of this Code of Conduct should be reported to this address.

We will take all reports seriously, guaranteeing full discretion.









### Section IV

# MONITORING AND UPDATING MECHANISM





This Supplier Code of Conduct is subject to the review mechanism described in the CCC Group Code of Ethics under Monitoring and Updating Mechanism.

Every Code review initiative provides the grounds for initiating an Unscheduled Revision of the CCC Group Code of Ethics due to the high degree of overlap between these two Policies.

A Supplier agrees to observe this Code in a Declaration or Statement drawn up in the form set out as schedules to this Code of Conduct.

Such statement is signed on behalf of the Supplier by its authorised representative.

The authorised representative should be the signatory of the contract with CCC or a person with equivalent powers and position.

# $\mathsf{PL}$

The Code in **Polish** is publicly available at:

CORPORATE.CCC.EU/POLITYKI-I-PREZENTACJE



# EN

The Code in **English** is publicly available at:

HTTPS://CORPORATE.CCC.EU/EN/ POLICIES-AND-PRESENTATIONS











## Section **V**

# CODE OF CONDUCT IMPLEMENTATION





This Code will be provided once to each selected Supplier during the process of establishing a business relationship with the Supplier. Each Supplier is required to sign once a Declaration of Compliance with the Supplier Code of Conduct. Entities classified as Key Suppliers are required to sign once a Key Supplier Statement of Compliance with the CCC Group Supplier Code of Conduct. The signing of a Declaration of Compliance or a Key Supplier Statement constitutes an obligation to perform the contract in accordance with the provisions of this Code.

Detailed provisions concerning the requirements and principles of collaboration with a Supplier are set out in each relevant contract.

CCC requires its Suppliers to:

- implement the standards set forth in this Code in their own business activities and those of their sub-suppliers;
- identify and manage risks with respect to the issues covered by this Code;
- continuously improve and implement potential corrective measures;
- immediately report to CCC any events resulting in violations of this Code.

CCC reserves the right to evaluate Suppliers' compliance with this Code and to monitor contract performance for such conformity. Where justified, CCC reserves the right to suspend the collaboration until non-compliance is remedied or corrective actions are implemented. CCC reserves the right to terminate the contract on the terms and in the manner specified therein if a Supplier finds it impossible to comply with the provisions of this Code.

The Supplier shall make its sub-suppliers aware of the Code and shall be liable for breaches of the Code by the sub-suppliers.









# Section VI

# ATTACHMENTS

| 6.1. | GLOSSARY  | 33 |
|------|---|----|
| 6.2. | DECLARATION OF COMPLIANCE WITH THE CCC GROUP<br>SUPPLIER CODE OF CONDUCT            | 35 |
| 6.3. | KEY SUPPLIER STATEMENT OF COMPLIANCE WITH THE CCC<br>GROUP SUPPLIER CODE OF CONDUCT | 36 |
| 6.4. | EXAMPLES OF ACCREDITED LABORATORIES   | 37 |
| 6.5. | RESTRICTED SUBSTANCES LIST  | 39 |





#### 6.1. GLOSSARY

| SUPPLIER   | <ul> <li>any entity that has entered into a written contract and/or signed a purchase order with<br/>CCC SA or any subsidiary of the CCC Group under which it supplies merchandise, non-<br/>commercial goods, and/or services covered by such contract and/or order.</li> </ul>  |
|--|---|
| KEY SUPPLIER   | <ul> <li>a Supplier whose business relationship with CCC SA or a subsidiary of the CCC Group is<br/>material in terms of turnover value, contract term, or proper operation of strategic<br/>processes at the CCC Group.</li> </ul>   |
| DISCRIMINATION   | <ul> <li>occurs when a person is treated less favorably than someone else would be treated in a<br/>comparable situation because of characteristics such as sex, race, ethnic origin,<br/>nationality, religion, religious denomination, worldview, disability, age, or sexual<br/>orientation.</li> </ul>  |
| NATURAL FUR  | - an animal hide or its part covered with hair, in a raw or processed state, or the hide of any animal killed solely for its pelt, including, without limitation, minks, foxes, rabbits, karakul lambs, and raccoon dogs.   |
| GHG PROTOCOL   | - a global standard for companies and organizations to measure and manage greenhouse gas emissions.   |
| CCC GROUP CODE<br>OF ETHICS  | - the principal document governing ethical conduct at the CCC Group. Also referred to herein as the Code of Ethics.   |
| CORRUPTION   | <ul> <li>means promising, offering, giving, soliciting, demanding, or accepting by any person,<br/>directly or indirectly, any benefit, whether financial, personal, or otherwise, for that or any<br/>other person, or accepting an offer or promise of any of the foregoing in return for an act<br/>or omission to act in the exercise of a public function or in the course of business.</li> </ul> |
| JUVENILE<br>ALLOWED TO<br>WORK   | - the rules for hiring juveniles in Poland are set out in the Labour Code. A juvenile is a person who has turned 16 but has not yet turned 18 years of age (Art. 190.1). An unskilled juvenile may be employed only for the purposes of vocational training (Art. 191.2).   |
| WORKPLACE<br>BULLYING  | <ul> <li>a pattern of conduct or behavior against an employee involving persistent and long-term<br/>harassment or intimidation, resulting in the employee doubting their professional worth<br/>and/or with the purpose or effect of humiliating, ridiculing, ostracizing, or excluding the<br/>employee from the team.</li> </ul>   |
| SEXUAL<br>HARASSMENT   | <ul> <li>any unwanted behavior of a sexual nature, whether verbal, non-verbal, or physical, which has the purpose or effect of violating a person's dignity, particularly where it creates an atmosphere of intimidation, hostility, degradation, humiliation, or offense. Key characteristics of sexual harassment are its unwanted and unwelcome nature.</li> </ul>                                   |
| MAXIMUM ADMISSIBLE CONCENTRATIONS (MAC) AND MAXIMUM ADMISSIBLE INTENSITIES (MAI) | - the maximum admissible intensity of a physical agent harmful to health, established as the level of exposure to which workers may be exposed during their entire working life without adverse effects on their health or that of future generations.  |





| EMPLOYEES               | - all persons providing work for an entity regardless of the legal form of the employment relationship, position and functions performed.   |
|-------------------------|---|
| UNSCHEDULED<br>REVISION | <ul> <li>a revision of the CCC Group Code of Ethics not conducted on a regular basis but on an as<br/>needed basis to reflect the introduction of new regulations or identification of new best<br/>practices.</li> </ul> |
| SCOPE 1                 | <ul> <li>direct emissions from fuel combustion in stationary or mobile sources owned or controlled<br/>by a company, or from industrial processes and refrigerant leaks.</li> </ul>                                       |
| SCOPE 2                 | - indirect emissions from the consumption of imported (purchased or externally supplied) electricity, heat, process steam, and cooling (GHG emissions physically occur at the point of energy generation).                |
| JOB GRADE               | - a component of the system for classifying employees according to their job roles.   |
| WHISTLEBLOWER           | <ul> <li>a person who is in possession of information that such person deems important, providing<br/>evidence of misconduct related to the operation of a company.</li> </ul>  |





# 6.2. DECLARATION OF COMPLIANCE WITH THE CCC GROUP SUPPLIER CODE OF CONDUCT

| (NAME OF ORGANISATI  | IONAL UNIT OF THE CCC GROUP)  |
|--|---|
| DECL   | ARATION   |
| (ORGAI   | NISATION NAME)  |
| comply with the principles set out therein. with all Polish and EU standards, including Regulation (EC) No 1907/2006 of the Europe | Group Supplier Code of Conduct. We undertake to We also confirm that the goods we supply complying the limits for dangerous substances set under opean Parliament and of the Council of 18 December ation, Authorisation and Restriction of Chemicals |
| products within the meaning of the Polish C<br>Kodeks cywilny, Dz. U. z 2024 r. poz. 100   | ducts) supplied by us do not constitute hazardous fivil Code (pol. Ustawa z dnia 23 kwietnia 1964 r. 61 z późn. zm.) or the Council Directive of 25 July lations and administrative provisions of the Member lucts (85/374/EEC).                      |
| We are aware that violations of the Code or  | this Declaration by us or our subsuppliers may have   |
| legal consequences, including in particular t  | ·   |
| First and last   | name of the person submitting the declaration   |
| Position of the  | ne person submitting the declaration  |
| Name of the  | entity to which the declaration relates   |
| Address of th  | ne entity to which the declaration relates  |
| Handwritten  | signature   |
| Date and pla   | ce  |



### CCC

# WITH THE CCC GROUP SUPPLIER CODE OF CONDUCT

| (NAME OF ORGANISATIONAL UNIT OF THE CCC GROUP)  |
|---|
| D   |
| STATEMENT   |
| (NAME OF ENTITY)  |
| epresent on behalf of, at we have read the CCC Group Supplier Code of Conduct and that we undertake to emply with the principles set out therein.   |
| lso confirm that the goods we supply comply with all Polish and EU standards, including the nits for dangerous substances set under Regulation (EC) No 1907/2006 of the European Irliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, uthorisation and Restriction of Chemicals ('REACH').   |
| oreover, I confirm that the goods (articles) supplied by us do not constitute hazardous products thin the meaning of the Polish Civil Code (pol. Ustawa z dnia 23 kwietnia 1964 r. Kodeks wilny, Dz. U. z 2024 r. poz. 1061 z późn. zm.) or the Council Directive of 25 July 1985 on the proximation of the laws, regulations and administrative provisions of the Member States oncerning liability for defective products (85/374/EEC). |
| m aware that violations of the Code or this Declaration by us or our sub-suppliers may have legal<br>ensequences, including in particular termination of the contract by CCC.   |
| urther declare that we consent to being covered by the mechanisms of monitoring   |
| ompliance with the Code:  |
| Audit   |
| Disclosure of information through a dedicated system or individual enquiries  |
| First and last name of the person submitting the statement  |
| Position of the person submitting the statement   |
| Name of the entity to which the statement relates   |
| Address of the entity to which the statement relates  |
|   |
| Handwritten signature   |
| Date and place  |





#### 6.4. EXAMPLES OF ACCREDITED LABORATORIES

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#### 6.5. RESTRICTED SUBSTANCES LIST

|  | METHOD  |                               |          |               |                 |                                      | MAT                   | ERIAL      |          |         |       |       |           | CCC<br>ORDE   | ŔS  | HR GROUP<br>ORDERS   | WHOLESALE<br>ORDERS |
|--|---|-------------------------------|----------|---------------|-----------------|--------------------------------------|-----------------------|------------|----------|---------|-------|-------|-----------|---|---|--|---------------------|
| RESTRICTED<br>SUBSTANCE                                    |   | COATING (VARNISH,<br>POLYMER) | PRINTING | NATURAL FIBER | SYNTHETIC FIBER | FUNCTIONAL FINISHINGS / IMPREGNATION | RUBBER AND ELASTOMERS | WOOD       | PLASTICS | LEATHER | METAL | FOAMS | PACKAGING | Children  | Adults  |  |                     |
| Alkylphenol (AP) and<br>Alkylphenol<br>Ethoxylates (APEO)  | Textile: DIN EN<br>ISO 18254-1<br>Leather: DIN EN<br>ISO 18218-1<br>Polymer: In house<br>method with reference<br>to CADS method                                    | •                             |          | •             | •               |                                      |                       |            | •        | (APEO)  |       | (AP)  |           | Nonylphenol &<br>Nonylphenoletoxyl<br>ate: 1000 mg/Kg | Nonylpheno<br>I &<br>Nonylphenol<br>etoxylate:<br>1000<br>mg/Kg | AP: 30<br>mg/kg (Each)<br>APEO: 100<br>mg/kg (Each)                    |                     |
|  | Textile: ISO14362-1:2017<br>Leather: ISO17234-<br>1:2015<br>4-<br>aminoazobenzene<br>confirmation:<br>Textile: ISO 14362-<br>3:2017<br>Leather: ISO17234-<br>2:2011 | ,                             |          | •             | •               |                                      |                       | • (+paper) |          | •       |       |       |           | 30 mg/kg (Each)                                       | 30 mg/kg<br>(Each)  | 20 mg/kg<br>(Each)   |                     |
| Short Chain<br>Chloroparaffins<br>(SCCP) (C10 - C13)       | DIN EN ISO 18219  |                               |          |               |                 |                                      |                       |            |          |         |       |       |           | 1500 mg/kg  | 1500 mg/kg  | 1000<br>mg/kg  | 500 mg/Kg           |
| Medium Chain<br>Chloroparaffins<br>(MCCP) (C14 - C17)      | DINI EN ISO 19210   |                               |          |               |                 | •                                    | •                     |            | •        | •       |       | •     |           | /   | /   | 1000<br>mg/kg  |                     |
| Chlorinated phenols<br>(PCP / TeCP / TriCP /<br>DCP / MCP) | Textile: Modified §<br>64 LFGB BVL<br>B82.02.8 with<br>alkaline digestion<br>Leather: ISO<br>17070  |                               | •        | •             | •               | •                                    |                       | (+paper)   |          | •       |       |       |           | PCP 5 mg/kg   | PCP: 5 mg/kg  | MCP / DCP<br>/ TriCP /<br>TeCP:<br>2 mg/kg<br>(Each)<br>PCP:1<br>mg/kg |                     |
| Chromium (VI)  | ISO 17075-1<br>(without<br>ageing) ISO<br>17075-1 (After<br>ageing)   |                               |          |               |                 |                                      |                       |            |          | •       |       |       |           | without ageing: 3<br>mg/kg                            | without ageing:<br>3 mg/kg                                      | After<br>ageing: 3<br>mg/kg  |                     |
| Dimethyl Fumarate  | CEN ISO/TS 16186  | •                             | •        |               | •               | •                                    | •                     |            | •        | •       |       | •     |           | 0.1 mg/kg   | 0.1 mg/kg   | 0,1 mg/kg  |                     |
| Allergenous Disperse<br>Dyes                               | DIN 54231   |                               |          |               | •               |                                      |                       |            |          |         |       |       |           | 5 mg/L  | 5 mg/L  | 3,3 mg/L 50<br>mg/kg<br>(each)   |                     |
| Carcinogenic Dyes  | DIN 54231   |                               |          |               | •               |                                      |                       |            |          |         |       |       |           | /   | /   | 3,3 mg/L 50<br>mg/kg<br>(each)   |                     |

|  |  | IV | $\vee$ | VI |
|--|--|----|--------|----|



|                          |   |                            |          |               |                 |                                      | MAT                   | ERIAL |          |         |       |       |           | CCC<br>ORDERS |           |  |   |              |         |  |
|--------------------------|---|----------------------------|----------|---------------|-----------------|--------------------------------------|-----------------------|-------|----------|---------|-------|-------|-----------|---------------|-----------|--|---|--------------|---------|--|
| RESTRICTED<br>SUBSTANCE  | METHOD  | LYMER)                     |          |               |                 | /83                                  | ERS                   |       |          |         |       |       |           |               |           | HR GROUP<br>ORDERS                           | WHOLESALE<br>ORDERS   |              |         |  |
| COSTANCE                 |   | COATING (VARNISH, POLYMER) | PRINTING | NATURAL FIBER | SYNTHETIC FIBER | FUNCTIONAL FINISHINGS / IMPREGNATION | RUBBER AND ELASTOMERS | WOOD  | PLASTICS | LEATHER | METAL | FOAMS | PACKAGING | Children      | Adults    |  |   |              |         |  |
| Formaldehyde             | Textiles: DIN EN<br>ISO 14184-1<br>Leather: DIN EN<br>ISO 17226-2<br>Wood: EN 717-3 |                            | •        | •             |                 | •                                    |                       | •     |          | •       |       |       |           |               |           | Children: 20<br>mg/kg<br>Adults: 75<br>mg/kg | Age<36months: 16 mg/kg Age>36 months: 75 mg/kg (direct skin contact); 150 mg/kg (without direct skin contact) |              |         |  |
| Mercaptobenzothiazo<br>e | In house method with<br>reference to CADS<br>method                                 |                            |          |               |                 |                                      | •                     |       |          |         |       |       |           | ,             | /         | 100 mg/kg                                    |   |              |         |  |
| Extractable Heavy Met    | al Content  |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           |  |   |              |         |  |
| Antimony (Sb)            | )   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 30 mg/kg                                     |   |              |         |  |
| Arsenic (As)             |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 0.2/kg                                       |   |              |         |  |
| Barium (Ba)              |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 1000<br>mg/kg                                |   |              |         |  |
| Lead (Pb)                |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           |  |   |              | 1 mg/kg |  |
| Cadmium (Cd)             |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           |  |   | 0.1<br>mg/kg |         |  |
| Chromium (Cr)            | Textile: DIN EN 16711-2<br>Leather: DIN EN ISO                                      |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 2 mg/kg                                      |   |              |         |  |
| Chromium V               | 17072-1<br>Cr (VI) for leather<br>material: ISO 17075-1                             |                            |          |               | •               |                                      |                       |       |          |         |       |       |           |               |           | 3 mg/kg                                      |   |              |         |  |
| Cobalt (Co)              |   |                            |          |               | •               |                                      |                       |       |          |         |       |       |           |               |           | 4 mg/kg                                      |   |              |         |  |
| Copper (Cu)              |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 50 mg/kg                                     | 25 mg/Kg  |              |         |  |
| Nickel (Ni               |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 4 mg/kg                                      |   |              |         |  |
| Selenium (Se)            |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 500 mg/Kg                                    |   |              |         |  |
| Mercury (Hg)             |   |                            |          |               |                 |                                      |                       |       |          |         |       |       |           |               |           | 0.02 mg/kg                                   |   |              |         |  |
| Total Lead               | DIN EN 16711-1  | •                          |          |               |                 |                                      | •                     |       | •        |         |       | •     |           | /             | 90 mg/Kg  | 90 / 100<br>mg/kg                            |   |              |         |  |
| Total Cadmium            | Plastic, coating:<br>EN 1122; Metal:<br>Total digestion<br>method                   | •                          | •        |               |                 |                                      | •                     |       | •        |         |       | •     |           | 100 mg/kg     | 100 mg/kg | 100 mg/kg                                    |   |              |         |  |





|   |   |                               |          |               |                 |                                     | MAT                   | ERIAL | -        |         |       |       |           | CCC<br>ORDE   | ŔS  | HR GROUP<br>ORDERS   | WHOLESALE<br>ORDERS        |
|---|---|-------------------------------|----------|---------------|-----------------|-------------------------------------|-----------------------|-------|----------|---------|-------|-------|-----------|---|---|--|----------------------------|
| RESTRICTED<br>SUBSTANCE   | METHOD  | COATING (VARNISH,<br>POLYMER) | PRINTING | NATURAL FIBER | SYNTHETIC FIBER | FUNCTIONAL FINISHINGS / MPREGNATION | RUBBER AND ELASTOMERS | WOOD  | PLASTICS | LEATHER | METAL | FOAMS | PACKAGING | Children  | Adults  |  |                            |
| Nickel Release  | PD CR 12471: 2002 / DIN<br>13093:2017-09<br>/ DIN EN 1811:2015-10 |                               |          |               |                 |                                     |                       |       |          |         | •     |       |           | Direct and prolong<br>contact with skin:<br>0.5µg/cm2/ week | Direct and<br>prolong contact<br>with skin:<br>0.5µg/cm2/<br>week | Direct and prolong<br>contact with skin:<br>0.5µg/cm2/<br>week | 0,28<br>µg/cm2/week        |
| Nitrosamines  | EN 71-12  |                               |          |               |                 |                                     | •                     |       |          |         |       |       |           | /   | /   | 0.5mg/kg<br>(Each)   |                            |
| Organotin Compounds   | CEN ISO/TS 16179  |                               |          |               |                 |                                     |                       |       |          |         |       | •     |           | DBT / DOT / TBT /<br>TPhT:<br>1000 mg/kg (each)             | DBT / DOT / TBT<br>/ TPhT:<br>1000 mg/kg<br>(each)                | TRTO / TRT / TRNT-   |                            |
| Perflurooctane<br>sulfonates (PFOS)<br>(requiredifsample<br>declaredwithstain and<br>water repellant finishing) | DIN CEN/TS 15968  |                               |          |               |                 | •                                   |                       |       |          |         |       |       |           | 1 µg/m²   | 1μg/m²  | 1 μg/m²  |                            |
| Perflurooctanoic acid<br>(PFOA) (required if<br>sampledeclared with<br>stain and water repellant<br>finishing)  | DIN CEN/TS 15968  |                               |          |               |                 | •                                   |                       |       |          |         |       |       |           |   |   | 0,025mg/Kg   |                            |
| Phenylmercury   | DIN EN 16711-1  | •                             | •        |               |                 |                                     | •                     |       | •        |         |       | •     |           | 100 mg/kg   | 100 mg/kg<br>BBP DBP DEHF   | /  |                            |
|   | DIN EN ISO 14389  | •                             | •        |               |                 |                                     | •                     |       | •        |         |       | •     |           | BBP DBP DEHP DIBP<br>0,1 % for each and<br>sum              | DIBP:<br>0,1 % for each   | 0,1% each  | 0,05%                      |
| pH value  | Textile: DIN<br>EN ISO 3071<br>Leather: DIN<br>EN ISO 4045        |                               |          | •             | •               |                                     |                       |       |          |         |       |       |           |   | /   | Textile:4.0-7.5<br>Leather:3.5-<br>7.0                         |                            |
| Polycyclic aromatic<br>hydrocarbons<br>(PAHs)   |   | •                             |          |               |                 |                                     | •                     |       | •        |         |       | •     |           | 8 PAH: 0.5 mg/kg<br>(each)                                  | 8 PAH: 1 mg/kg<br>(each)  | 8 PAH:   | 8 PAK: 0,5<br>mg/Kg (each) |
| Naphthalen  | AfPS GS 2014:01 PAK   | •                             |          |               |                 |                                     | •                     |       | •        |         |       | •     |           |   |   | 10 mg/kg   |                            |
| Sum 17 PAH  |   |                               |          |               |                 |                                     | •                     |       | •        |         |       | •     |           |   |   | 10 mg/kg   |                            |
| Odoui   | 'SNV 195 651  | •                             | •        | •             | •               | •                                   | •                     | •     | •        | •       | •     | •     |           | /   | /   | Grade 3  |                            |
| Packaging - Cobalt<br>dichloride in<br>dessiccation bags  | In house method   |                               |          |               |                 |                                     |                       |       |          |         |       |       |           | Prohibited  | Prohibited  | Prohibited   |                            |
| Packaging-<br>Dimethylfumarate in<br>dessiccation bags  |   |                               |          |               |                 |                                     |                       |       |          |         |       |       |           | 0.1 mg/kg   | 0.1 mg/kg   | 0.1 mg/kg  |                            |
| Packaging - Sum of<br>Lead, Cadmium,<br>Chromium VI and<br>Mercury  |   |                               |          |               |                 |                                     |                       |       |          |         |       |       | •         | 100 mg/kg   | 100 mg/kg   | 100 mg/kg  |                            |



| RESTRICTED<br>SUBSTANCE                                  | METHOD                        | MATERIAL                      |          |               |                 |                                     |                       |      |          |         |       |       | OCCC<br>ORDERS |          |        |                    |                               |
|--|-------------------------------|-------------------------------|----------|---------------|-----------------|-------------------------------------|-----------------------|------|----------|---------|-------|-------|----------------|----------|--------|--------------------|-------------------------------|
|  |                               | COATING (VARNISH,<br>POLYMER) | PRINTING | NATURAL FIBER | SYNTHETIC FIBER | FUNCTIONAL FINISHINGS / MPREGNATION | RUBBER AND ELASTOMERS | WOOD | PLASTICS | LEATHER | WETAL | FOAMS | PACKAGING      | Children | Adults | HR GROUP<br>ORDERS | WHOLESALE<br>ORDERS           |
| Alkylphenol (AP) and<br>Alkylpheno<br>Ethoxylates (APEO) |                               |                               |          |               |                 |                                     |                       |      |          |         |       |       |                |          |        |                    |                               |
| Dimethy<br>Formamide<br>(DMFa)                           | DMFa: DIN CEN ISO/TS<br>16189 | ·s ·                          |          |               |                 |                                     |                       |      |          |         |       |       |                |          |        | 500 mg/kg          | Age < 36 months:<br>100 mg/Kg |
| 2-phenyl-2-<br>propano                                   |                               |                               | •        | •             |                 |                                     |                       |      | •        | •       |       | •     |                | /        | /      | 10 mg/kg           |                               |
| Acetophenone   |                               | -                             | •        |               | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | /      | 10 mg/kg           |                               |
| Benzene  |                               |                               | •        | •             | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | ,      | 1 mg/kg            |                               |
| Bis (2-<br>methoxyethyl)<br>ethei                        |                               |                               |          |               |                 |                                     | •                     | •    | •        | •       |       | •     |                | /        | ,      | 1000               |                               |
| Cyclohexanon   |                               |                               | •        | •             | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | /      | mg/kg<br>50 mg/kg  |                               |
| Ethylbenzene   |                               |                               | •        | •             | •               |                                     |                       |      | •        |         |       | •     |                | /        | /      | 50 mg/kg           |                               |
| Formamide  |                               |                               | •        | •             | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | /      | 100 mg/kg          |                               |
| Methyl ethyl<br>ketone (MEK)                             |                               |                               | •        | •             | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | ,      | 100 mg/kg          |                               |
| (DMFa)   |                               |                               | •        | •             | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | /      | t. b. a.           |                               |
| N-Methyl-2-<br>pyrrolidone<br>(NMP)                      |                               |                               | •        | •             | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | ,      | 500 mg/kg          |                               |
| Styrene  |                               |                               | •        | •             | •               |                                     | •                     | •    | •        | •       |       | •     |                | /        | /      | 10 mg/kg           |                               |
| Tetrachloroeth<br>ylene                                  |                               |                               | •        |               |                 |                                     |                       |      | •        |         |       | •     |                | /        | /      | 20 mg/kg           |                               |
| Toluene  |                               |                               | ,        | •             |                 |                                     |                       |      | •        |         |       | •     |                | /        | /      | 50 mg/kg           |                               |
| Trichlorethyler<br>e                                     |                               | -                             | •        | •             | •               |                                     |                       |      | •        |         |       | •     |                | /        | /      | 50 mg/kg           |                               |
| Xylenes  |                               |                               | •        | •             | •               |                                     | •                     |      | •        |         |       | •     |                | /        | /      | 50 mg/kg           |                               |
| PVC  | Beilstein / FT-IR             |                               | •        |               |                 |                                     |                       |      |          |         |       |       |                | 1        | ı      |                    | Not detected                  |



