

Superdry & Co

CHEMICAL MANAGEMENT POLICY

SUMMARY

At Superdry we are committed to ensuring our products are made with safe chemistry that protects the environment and human health. Chemical compliance is one of our key sustainability objectives and we have implemented a **Chemical Management Policy** at Superdry that requires supply chain compliance to global legislation, such as UK and EU REACH, and it also requires supply chain adherence to our **RSL (Restricted Substance List)** and supply chain engagement to ensure compliance to international standards, including the **ZDHC MRSL (Manufacturing Restricted Substances List)**.

All suppliers must be chemically compliant to global legal requirements and Superdry's Chemical Management Policy. It is a Superdry supplier responsibility to cascade Superdry's chemical compliance requirements to all supply chain partners and ensure they engage and conform to them.

Please take careful note that compliance to Superdry's Chemical Management Policy is a Superdry Supplier requirement, and the responsibility remains with you, the Supplier, to source responsibly in order to comply with chemical restrictions and Superdry's requirements.

Continual failures, lack of engagement, progress or required improvements, with regard to chemical non-compliance and our Chemical Compliance requirements, may result in Superdry exit from the supplier.

Superdry's Chemical Management Policy and the initiatives that suppliers must implement throughout Superdry's supply chain include:

1. Compliance to **global legal requirements**
2. The [Superdry RSL \(Restricted Substance LIST\)](#) – aligned to **AFIRM**
3. The **Superdry RSL Due Diligence Testing Programme**
4. **Banned Processes, Chemicals & Substances**
5. Superdry supply chain **ZDHC Requirements**

SUPERDRY RSL (RESTRICTED SUBSTANCE LIST) & AFIRM

We are a member of **AFIRM, The Apparel and Footwear International RSL Management Group**, who's mission it is to reduce the use and impact of harmful substance in the apparel and footwear supply chain and our RSL is globally aligned. The AFIRM RSL captures the most stringent regulations globally and in many cases includes additional chemicals or stricter limits to promote best practice. It's focus is the continuous advancement of chemicals management including phasing out or limiting restricted substances.

Our membership, and aligned RSL, allows us to manage chemicals in our supply chain, communicate information about these substances, and promote a common approach to chemical risk management, ultimately to improve safety and sustainability.

All suppliers must be chemically compliant to global legal requirements and Superdry's RSL limits.

[Superdry RSL 2025](#)

The Superdry RSL is aligned to AFIRM's with some requirements that go beyond AFIRM's due to our products and sustainability objectives.

Please also see direct link below to the AFIRM RSL, now available in 8 different languages.

<https://afirm-group.com/afirm-rsl/>

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Please download it and share with all key stakeholders in your organisation and supply chain partners along with Superdry's RSL. <https://www.afirm-group.com/afirm-rsl/>

All Suppliers must ensure that no banned materials or chemistry is used or present in Superdry products, these include the below and please also refer to the Banned Materials section in the Supplier Manual.

- 1) PVC
- 2) PFAs
- 3) Potassium Permanganate (with the exception of use in denims)

SUPERDRY CHEMICAL COMPLIANCE TESTING PROGRAMME

The Superdry RSL Due Diligence Testing Programme provides a framework to assess risk and requires all suppliers to test a range of finished products to ensure bulk compliance to specific chemical limits as specified in our RSL. This is biannual, seasonal, programme ensures styles across all suppliers globally are reviewed and a due diligence percentage tested. We will categorically not utilise product components that we find to be non-compliant to global legislative requirements and we work closely with our supply base to rectify any RSL non-compliance, identify the root cause and ensure corrective measures are implemented.

Superdry's due diligence Chemical Compliance Testing Programme, which started in May 2018, will continue, as per previous seasons, in accordance to our RSL, global legislative requirements, REACH (European law) and Cal Prop 65 (State of California regulations).

- The Superdry RSL will be updated as required, to remain aligned with any new global legislative requirements.
- The testing programme also reflects increases in legislation and wholesale customer requirements.
- Although we may not test each season for every chemical on the RSL, you must ensure you comply to all limits within it.

This is a supplier's responsibility to pay for any styles selected to be tested by Superdry and ensure testing is done from bulk components and tested in good time, so it does not impact required delivery dates.

Testing Failures

Any failures on chemical compliance must be escalated immediately to the Chemical Compliance Team for resolution.

- You must quarantine the failed goods and notify us of the failure within 24 hrs. We will then discuss and identify with you the root cause and corrective actions required. You may find the AFIRM training module on Failure Resolutions helpful as it clearly outlines the most important points.
- Continual failures on chemical compliance may result in Superdry exit from the supplier.
- Sustained success in RSL testing, accompanied by progress in achieving ZDHC goals, will result in a proportional reduction in requested due diligence tests in subsequent seasons. Conversely, chemical testing failures will result in a proportional increase in requested due diligence tests.
- Superdry takes chemical compliance failures with the utmost seriousness. In the first instance we will work with you to find a compliant solution within the delivery timeframe; however, if this is not possible, and as a last resort, we reserve the right to cancel the affected order. In extreme cases, where the non-compliant component is used on other styles, these may also be cancelled.

AFIRM's Training Committee have published five new explainer videos available on the AFIRM website. Please ensure that the person in your organisation responsible for chemical management goes through these training modules.

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Please access them through this link and note they are now also available in 6 languages.
<https://afirm-group.com/start-here/>

- Introduction to AFIRM
- Understanding the AFIRM RSL
- How to Select Materials/Products for RSL Testing
- How to Read a Test Report
- Failure Resolutions

Please take careful note that compliance to Superdry's RSL is a Superdry Supplier requirement, and the responsibility remains with you, the Supplier, to source responsibly in order to comply with the chemical restrictions.

SUPERDRY ZDHC POLICY

Superdry is also an active member of **ZDHC, the Zero Discharge of Hazardous Chemicals** organisation. In 2024 we graduated from being a Friend to a **Signatory Brand of ZDHC**. As a Signatory Brand we are now part of the **ZDHC BtZ (Brands to Zero) programme** which assists us in achieving sustainable chemical management in our supply chains by providing guidelines, tools, and a framework for third-party assessment and improvement. All Superdry Suppliers and their in-scope supply chain partners, processing or making Superdry products, must implement Superdry's Chemical Compliance requirements and be part of the **ZDHC StZ programme**.

All suppliers must agree to work towards achieving MRSL ZDHC compliance and actively contributing to our ZDHC objectives. Providing full visibility of your supply chain partners is required.

It is your responsibility to ensure your supply base, Tier 2 and Tier 3 suppliers, such as your wash houses, printers and fabric mills, engage with us on the Superdry ZDHC Roadmap and the requirements set within it.

This will include both yourselves and your supply base following the ZDHC requirements which include participating in ZDHC training, signing up to the ZDHC Gateway and Supplier to Zero Programmes, working through the certification levels, utilising a chemical management tool such as BVE3, uploading monthly In-Check reports and providing ClearStream waste water testing reports where required.

All results to be shared with Superdry's Chemical Compliance Team through ZDHC platform connection.

Superdry supply chain **ZDHC Requirements**:

- Commit to implementation [**ZDHC MRS** \(Manufacturing Restricted Substance list\)](#)
- Register to [**ZDHC Gateway**](#)
- Be part of the [**ZDHC StZ \(Supplier to Zero\) Programme**](#)
- Implement a [**CMS \(Chemical Management System\)**](#)
- Comply with [**Superdry Wastewater Policy**](#)
- Commit to implementation of [**ZDHC Wastewater Guidelines**](#)
- Provide **ZDHC Performance InCheck** reports
- Progress to **ZDHC Verified InCheck**
- Provide **ZDHC Clearstream Wastewater** reports
- Progress in **MRSL and WWG conformance**
- Progress through the [**StZ Levels**](#)
- Action **Capacity Building (e.g. ZDHC Academy)**
- Commit to implementation of [**MMCF ZDHC Guidelines**](#), complete **MMCF module** where applicable
- **Cascade requirements to your supply chain partners** and bring them onto the same ZDHC Roadmap to Zero programme where applicable

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Chemical Compliance Documents & Links

- [Superdry RSL \(Restricted Substance List\)](#)
- [Superdry Wastewater Policy](#)
- [AFIRM RSL](#)

Please note all ZDHC Publications can be assessed from the ZDHC platform link as below:

<https://www.roadmaptozero.com/>

This includes the:

- [ZDHC MRSL](#)
- [ZDHC Wastewater Guidelines](#)
- [ZDHC MMCF Guidelines](#)

Please note there is further documentation relating to ZDHC requirements which suppliers are fully responsible for accessing, understanding and implementing.

ROADMAP TO ZERO OBJECTIVES

We have established a **Superdry ZDHC Roadmap to 2030** to eliminate hazardous chemicals throughout our supply chain by promoting sustainable chemistry and our chemical compliance requirements. Our goal is to achieve ZDHC Champion status by 2030 with the objective that all supply chain Tiers, 1-3, are engaged with the ZDHC StZ, Supplier to Zero programme, and compliant to the ZDHC requirements.

We will continue to provide leadership and promote sustainable chemical management in our global supply chain to ensure the safer and more sustainable manufacture of our products.